



The National  
**Mathematics  
and Science**  
College

## Safeguarding Policy

### KEY INTERNAL CONTACT DETAILS



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The Governors' Nominated  
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Principal

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*Next Review June 2024*

## KEY EXTERNAL CONTACT DETAILS:

If you think a child is in immediate danger always call the emergency services on 999.

- To discuss a non-emergency matter with the Police call 101.
- If you are concerned that a child or young person is being harmed or is at risk of harm, but there is no immediate danger, or you need advice or information, please call **Coventry Children's Social Care at the Multi Agency Safeguarding Hub (MASH) on 024 7678 8555.**
- **Out of office hours please call the Emergency Duty Social Worker on 024 7683 2222. LADO Jan Fossick: 024 7697 5483**
- Online referral form
- Email: [lado@coventry.gov.uk](mailto:lado@coventry.gov.uk)
- Website: Coventry Safeguarding Children Partnership

If there is a **risk of immediate harm to a child**, staff should act immediately.

**Anyone may make a referral to children's services or the police.**

Depending on the situation, staff should call the relevant local authority number above or call 999 straight away and/or contact the DSL who may call other relevant agencies where appropriate. Following local authority and/or police guidance, the DSL will inform parents of this contact/referral: staff should **never** inform parents themselves.

**Staff should not assume that another colleague or professional will take action. Whistleblowing:**

Members of staff may use the College's whistleblowing policy to draw attention in good faith to any perceived failing with regard to safeguarding practice either in individual cases or concerning more general circumstances.

For allegations against staff or other adults within the College community the guidance on allegations within this policy should be followed.

### Inspectorates:

- ISI: 0207 600 0100 or email [concerns@isi.net](mailto:concerns@isi.net)
- Ofsted: 0300 123 466 or email [CIE@ofsted.gov.uk](mailto:CIE@ofsted.gov.uk)

### Other contacts

- Help with reporting child abuse: [Report child abuse to a local council - GOV.UK \(www.gov.uk\)](https://www.gov.uk/report-child-abuse-to-a-local-council)
- NSPCC Child Protection Helpline: 0808 800 5000
- NSPCC Sexual Abuse Helpline: 0800 136 663 The NSPCC helpline providing both children and adults who are victims of sexual abuse in schools with the appropriate support and advice. This includes how to contact the police and report crimes if they wish. The helpline will also provide support to parents and professionals too.
- NSPCC Whistleblowing Helpline: 0800 028 0285
- NSPCC FGM helpline: 0800 028 3550 [fgmhelp@NSPCC.org](mailto:fgmhelp@NSPCC.org)
- Police Prevent team: 101 and ask for the Prevent Team or 0345 113 5000 [prevent@coventry.gov.uk](mailto:prevent@coventry.gov.uk)
- Coventry Safeguarding Children Partnership:

<http://www.coventry.gov.uk/safeguardingchildren>

- Warwickshire Safeguarding Children Partnership: 01926 410410 or out of hours 01926 886922  
<http://www.safeguardingwarwickshire.co.uk/safeguarding-children>
- RISE (emotional well-being and mental health services for young people in Coventry and Warwickshire) 0800 200 2121 or Rise Crisis Team 0808 196 6798

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## **1. Summary Guidance**

### **Disclosures**

If a child discloses to you or you suspect abuse including online:

- Report any disclosure immediately to a DSL or, in their absence, a DDSL.
- Do not question a child should you suspect abuse, but refer your suspicion to the DSL or DDSL immediately.
- Make a clear record of what the child has said to you and give this to the DSL or DDSL.
- Do not ask leading questions and do not promise confidentiality to the child.
- Ensure that the child is safe.
- Do tell the child that you must speak to a DSL or a DDSL.
- Be guided by the DSL or DDSL as to what you should do next: do not investigate yourself
- Do not discuss the issue with colleagues, friends, family or anyone else unless otherwise directed by the DSL or DDSL

Remember: It is important for all staff to understand that some children may find it hard to tell someone they are being abused: they may not be ready or know how to do so. Hence, we provide a wide range of avenues for children to speak out with confidence that support will be available and action will be taken, including: tutors, boarding staff, trusted adults for LGBTQIA+ pupils, counsellors, independent listeners, senior pastoral staff, learning support staff, and medical practitioners.

### **Child-on-child including sexual harassment or violence**

If a child discloses to you or you suspect abuse report this immediately to the DSL or in their absence a DDSL and make a clear record of what the child has said or of the information given.

- Be guided by the DSL or DDSL as to next steps: do not investigate yourself. In all cases of disclosure:
- Reassure victims that they are being taken seriously and that they will be 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; no victim should ever be made to feel ashamed for making a report.

### **Allegations against and low-level safeguarding concerns regarding staff other than the Principal**

- Report an allegation immediately to the Principal or in his absence the Governors' Nominated Person without informing the person against whom the allegation has been made.
- Report a low-level concern (using if appropriate the protocols for Neutral Notification as set down in the Code of Conduct) to the Principal or in his absence to the DSL without informing the person relating to whom the concern applies.
- Should you believe that there may be a conflict of interest on the part of the Principal, refer the matter to the Governors' Nominated Person and/or the local children's services.

### **Allegations against and low-level safeguarding concerns regarding to the Principal**

- Report this immediately to the Governors' Nominated Person without informing the Principal.

**Be aware in all cases that you may contact local children's services and/or the Police directly.**

## 2. Rationale

- 2.1 The National Science and Mathematics College (hereafter College) recognises the responsibility it has under Section 175 of the Education Act 2002, the Education (Independent Schools Standards) (England) Regulations 2003 and the statutory guidance of 'Keeping Children Safe in Education' (2023) issued under section 175 of the Education Act 2002 to have arrangements in place to safeguard and promote the welfare of children who are students at the College.
- 2.2 Safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. 'Keeping Children Safe in Education' (KCSIE) (DfE 2023). The College recognises that safeguarding and promoting the welfare of students is of upmost importance and is everyone's responsibility.
- 2.3 Our approach to safeguarding is informed not just by KCSIE but also by the guidance given in Working together (2023): in particular we have taken note and acted upon the needs of children as articulated in Working Together:
- **vigilance:** to have adults notice when things are troubling them
  - **understanding and action:** to understand what is happening; to be heard and understood; and to have that understanding acted upon
  - **stability:** to be able to develop an ongoing stable relationship of trust with those helping them
  - **respect:** to be treated with the expectation that they are competent rather than not
  - **information and engagement:** to be informed about, and involved in procedures, decisions, concerns and plans
  - **explanation:** to be informed of the outcome of assessments, and decisions and reasons when their views have not met with a positive response
  - **support:** to be provided with support in their own right as well as a member of their family
  - **advocacy:** to be provided with advocacy to assist them in putting forward their views
  - **protection:** to be protected against all forms of abuse, exploitation, and discrimination, and the right to special protection and help if a refugee.
- 2.4 At the heart of statutory guidance to schools and others dealing with children is a child-centred approach with emphasis being placed upon working with parents and carers whilst ensuring that the wishes of the child are central to decision-making.
- 2.5 There is a mandatory duty upon teachers to report to the police where they discover that Female Genital Mutilation (FGM) appears to have been carried out on a girl under 18. Section 5B 'Female Genital Mutilation Act' (2003) and 'Keeping Children Safe in Education' (DfE 2023).

- 2.6 The Counter-Terrorism and Security Act 2015, section 26, requires the College to 'have due regard, in the exercise of their functions, to prevent people from being drawn into terrorism.' This 'Prevent Duty' is covered within the safeguarding procedures of the College.
- 2.7 The College is committed to safeguarding and promoting the welfare of young people and expects all staff and volunteers to share this commitment. 'Staff' refers to all those working in or on behalf of the College (including teaching, support, boarding, contract staff as well as governors, board members and volunteers).
- 2.8 References made to 'child' and 'children' in this policy refer to children and young people under the age of 18 years. However, the principles apply to professional behaviour towards all students, including those over the age of 18 years. The College is committed to promoting and safeguarding the welfare of those of its students who are young adults and internal safeguarding practices, procedures and culture will apply to all students regardless of age. Where necessary in situations involving young adults, the College will work with relevant external agencies as appropriate. The College's code of conduct makes clear to all staff that they are in a position of trust. It sets out the implications of that responsibility, including specific requirements regarding conduct towards our young adult students.
- 2.9 Through their day-to-day contact with students and direct work with families, staff at the College have a crucial role to play in noticing indicators of possible abuse, neglect or risk of being vulnerable to radicalisation and referring them to the appropriate agency, normally through the Designated Safeguarding Lead, to the appropriate Children's Team (Social Care) or Early Help provider.
- 2.10 Staff should be aware of their local early help process and understand their role in it and they should be particularly alert to the potential need for Early Help for a child who:
- is disabled or has certain health conditions and has specific additional needs;
  - has special educational needs (whether they have an Education, Health and Care (EHC) plan or not);
  - has a mental health need;
  - is a young carer;
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
  - is frequently missing/goes missing from care or from home;
  - is at risk of modern slavery, trafficking, sexual or criminal exploitation;
  - is at risk of being radicalised or exploited;
  - has a family member in prison, or is affected by parental offending;
  - is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
  - is misusing drugs or alcohol themselves;
  - has returned home to their family from care;
  - is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced

Marriage;

- is a privately fostered child; and
- is persistently absent from education, included persistent absences for part of the College day.

2.11 Staff should be aware of indicators which may signal that children are at risk from criminal and sexual exploitation (CCE and CSE) including county lines or with serious violent crime. These indicators include:

- frequent or prolonged absence from College, going missing for periods of time or regularly arriving to the residence/home/homestay late;
- change in friendship groups or friendships with older individuals or groups;
- associations with other individuals involved in exploitation;
- changes in emotional well-being;
- significant decline in performance;
- signs of self-harm, assault, unexplained injuries or a significant change in wellbeing; and
- misuse of drugs and/or alcohol; and
- unexplained gifts, money or new possessions.

2.12 Staff are well placed to identify young people whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff should 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.

2.13 Staff should understand the importance of challenging inappropriate behaviours between peers and be aware that child-on-child abuse can happen both inside and outside College and online.

2.14 Staff should be aware of the need to ensure that students are at risk when online. Hence they should be familiar with the College's approach to and policies regarding online safety:

- the need for the College to provide effective filtering and monitoring of the access to the Internet;
- the expectations and applicable roles and responsibilities in relation to filtering and monitoring;
- in particular they should be aware that the DSL has the lead responsibility for online safety, supported by the DDSL with responsibility for online safety;
- understanding the risks associated with online safety in general and Prevent in particular, with those related to the latter being set out in the College's risk assessment for Prevent.

2.15 Staff should be aware of the need to ensure that the College remains free from the dangers of online e-security threats and therefore should comply with the College's protocols relating to downloading files and following links provided when online, including in emails and other communications.



### 3 Key Principles

#### 3.1 There are five main elements to this Safeguarding and Child Protection Policy

**Prevention:** through the teaching and pastoral support offered to students and the creation and maintenance of a whole College protective ethos which provides a safe environment. Indeed we use a programme of preventative education including for sexual harassment and sexual violence.

**Preventing unsuitable people working with children:** through following safer recruitment practices, maintaining an accurate record of appropriate pre-employment checks made and ensuring suitable checks are made on all visitors to the College site. See the College's Safer Recruitment Policy.

**Training:** All staff members receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff receive safeguarding updates (via email and staff meetings) as required, but at least annually to provide them with relevant skills and knowledge to safeguard children effectively.

**Procedures:** for identifying and reporting cases, or suspected cases, of abuse including FGM, risk of radicalisation, child-on-child abuse, risk of criminal and sexual exploitation and risk of involvement in serious violent crime.

**Support:** for students who may have been abused; for students involved in child-on-child abuse; and for staff in their safeguarding role.

#### 3.2 The College has appointed a Designated Safeguarding Team, co-ordinated and managed by the Designated Safeguarding Lead (DSL) and monitored by a Safeguarding and Prevent Duty member of the board nominated for this purpose by the proprietors. The DSL is a member of the senior leadership of the College. There are two Deputy Designated Safeguarding Leads in the College.

#### 3.3 The College liaises closely with and follows the guidance provided by the Coventry Safeguarding Children Partnership. The College recognises that working with other agencies is essential to promote safeguarding and protect students from harm.

#### 3.4 Schools, colleges, early years and childcare settings, and other educational providers (including alternative provision) all have a pivotal role to play in safeguarding children and promoting their welfare. Their insight and co-operation are vital to the successful delivery of multi-agency safeguarding arrangements. People working in education settings play an important role in building relationships, identifying concerns and providing direct support to children. They may be the first trusted adult to whom children report safeguarding concerns.

#### 3.5 All members of the College staff accept their individual responsibilities for protecting children from harm and promoting welfare and are aware that anyone may make a referral to local children's services and/or the police.

#### 3.6 Our policy applies to all staff, non-teaching and teaching, governors and volunteers working in the College. Parents may also contact the DSL if they have concerns about a child.

## 4 Boarding Principles

- 4.1 We acknowledge that as a boarding school, there are additional factors that may affect safeguarding, in particular opportunities and vulnerabilities for child-on-child abuse, inappropriate staff/pupil relationships and online abuse. The College has due regard to the safeguarding requirements of the revised National Minimum Standards for Boarding (September 2022) and to the recommendations of the Independent Inquiry into Child Sex Abuse (IICSA) (March 2022).

IICSA noted that sexual abuse can and does occur:

- in all types of schools;
- to all ages of children.

And so, it recommended that schools must go beyond the acceptance that 'it could happen here' to the belief that 'it probably is happening here'.

- 4.2 The boarding environment is regarded by IICSA as a high risk for grooming and abuse by adults working at the school as well as providing opportunities for child-on-child sex abuse. Day pupils at boarding schools are also judged to be vulnerable to these risks. Overseas boarders may be especially vulnerable not just at College but when staying with their educational guardians for whom there is no convincing system of checks. The current statutory guidance and independent school standards are judged to be inadequate in these regards.

- 4.3 The Inquiry maintained that there is no simple general solution to the problem of child sexual abuse (CSA) in schools. Instead a series of incremental changes are proposed most of which require government action. However, several specific actions for individual schools are recommended, which the College fully embraces: accordingly we shall:

1. report any allegation of child sexual abuse to the inspectorate as well as to the DBS and TRA;
2. ensure that the Head, DSL, and members of the DS team (and DSG) are trained to the highest level;
3. ensure that RSE for all pupils including those with SEND is as effective as possible; and
4. ensure that pre-appointment checks and supervision of volunteers are as effective as possible.

- 4.4 We support and embrace the key substantive changes made to the National Minimum Standards for boarding:

1. the focus upon good rather than suitable or adequate provision (e.g. accommodation, facilities, food); how inspectors will decide between 'good' and suitable/adequate' is yet to be seen;
2. the central importance of the welfare and wellbeing of boarders;
3. the need to ensure that our policies reflect the interests and needs of boarders;
4. the need to monitor any lodgings, host families and guardians rigorously.

- 4.5 The College shall carry out an annual audit of boarding which shall be submitted to the proprietors: boarding pupils will be invited to provide feedback to proprietors on the experiences of boarding especially as it relates to their welfare and wellbeing.

4.6 Accordingly, the following guidelines amongst others will be followed:

- The **wellbeing of boarders** will be a primary concern.
- The risks associated with the **potential impact of sexual violence and sexual harassment** in the boarding environment will be considered including those involving online contact
- Any incidents of bullying or misconduct or sexual harassment and sexual violence within the boarding environment will be **recorded as boarding incidents**.
- Staff and boarders of all kinds and needs should know **what to do in an emergency including at night**.
- We shall ensure that there are **clear arrangements for arrival at and departure** from school.
- We shall ensure that **boarders know how to raise concerns** and staff must know how to respond when this happens.
- **Our behaviour and bullying policies** reference behaviour and bullying in boarding accommodation.
- Online safety is a priority and to that end we monitor and filter access via the College's IT systems to the Internet.
- In accordance with our **RSE policy** we promote good relationships amongst boarders.
- We take appropriate steps to ensure that **guardians are suitable and promote the welfare of boarders**.
- We do not appoint College staff as educational guardians for **boarders**.
- There will be termly checks in place for any **lodgings and host families** and DBS checks on all over 16s residing in such accommodation which will be good not merely suitable.

## 5 Additional Documentation and Guidance

- 5.1 Staff Code of Conduct:** all staff should be role models for children, dress appropriately and ensure they do not promote their own beliefs. They should make acceptable use of technologies including the use of social media. They should also ensure they treat everyone with respect, children and adults alike.
- 5.2** All staff should ensure that they have read and understood part one of '**Keeping Children Safe in Education**' (2023). College leaders and those staff who work directly with children (teachers and support staff) should also read and make sure they have understood Annex A. Pastoral staff and College leaders should read the new Part five of KCSIE (2023), "Part 5: Child on child sexual violence and sexual harassment". This document is discussed at INSET sessions on Safeguarding and a record kept of staff who have signed to acknowledge they have read and understood the document(s). A copy of the guidance kept in the Staff drive online and a hardcopy is available on request. New staff are given introductory safeguarding training as part of their induction.
- 5.3 Working Together** (2023)m which sets out inter alia the parameters for multi-agency work
- 5.4 Whistleblowing Policy:** all staff working in College (voluntary or paid) have a responsibility to report anything they deem to be untoward with regard to any general or specific failing of the College with regard to safeguarding, in line with the whistleblowing policy in Staff policies and procedures. The NSPCC website has a [whistleblowing helpline](#) of which staff are made aware during training.
- 5.5 Managing Allegations Against Staff:** The Board of Governors have adopted part 4 of '**Keeping Children Safe in Education**' (2023) DfE document 'Allegations of Abuse made against Teachers and Other Staff'.
- 5.6 Curriculum Policy:** the curriculum is designed to ensure students receive appropriate guidance regarding safeguarding, including online, and how to act responsibly through programmes such as PSHE and assemblies e.g. fundamental British values, alcohol, drugs, e-safety, Relationships and Sex Education, terrorism and racism. The curriculum also promotes equality of opportunity and helps students understand how they can influence and participate in decision making, recognise and manage risk and make safer choices. The PSHE (including RSE) Curriculum is evaluated and reviewed annually as part of the College assurance quality process.
- 5.7** Safeguarding throughout the curriculum is monitored and reviewed by the Designated Safeguarding Lead and team.

### Additional considerations:

- 5.8 Building Design:** this should take account of areas where students can congregate unsupervised leading to possibilities of bullying, substance use, abuse etc. Staff also need to be aware of areas where students could be unsafe (pond, gates, trees, building works).
- 5.9 Safeguarding and Health and Safety** are standing agenda item at the weekly SLT meetings.
- 5.10 Safer Recruitment and Selection:** The statutory guidance for Colleges in '**Keeping Children Safe in Education**' (2023) and '**Working Together to Safeguard Children**' (2023) are adhered to stringently. This ensures all adverts and job descriptions include a

commitment to safeguarding, relevant checks are completed and references taken prior to any appointment being made. The Principal and members of the Senior Leadership Team receive training in safer recruitment. See Safer Recruitment Policy.

**5.11 Behaviour Management:** a Behaviour Policy is in place and procedures for dealing with poor behaviour are clear to staff and students. See Behaviour Policy.

**5.12 Attendance:** attendance is monitored closely by the Senior Leadership Team. The Attendance, Compliance and Enforcement Service at the Local authority is informed if attendance becomes an issue – i.e. persistent absence.

The College will notify the relevant Local Authority if a child goes **missing from education** (defined to be absent from College without permission for a continuous period of 10 College days or more, at such intervals as are agreed between the College and the local authority) or if they are removed from the register under particular circumstances or if they are absent without reasonable explanation repeatedly or for two or more periods fewer than 10 days. See Attendance Policy.

**5.13 Anti-Bullying:** An Anti-bullying Policy is in place. This College operates zero tolerance of bullying, including cyber-bullying. Frequent use is made of assemblies throughout the year to ensure the anti-bullying message is put across. To allow or condone bullying may lead to consideration under child protection procedures. See Anti-bullying Policy.

**5.14 eSafety:** is essential in order to monitor websites children are using and to prevent 'grooming' and radicalisation. Filters are in place in College to prevent children accessing certain sites. All internet traffic over the College network is monitored by London Grid for Learning, which provides a specialised filter and firewalled internet connection, and monitors all traffic into and out of the College. Although monitoring systems are in place, care is taken to ensure that 'over-blocking' does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching of safeguarding. The DSL will liaise with technical and other staff to ensure that online safety within the College is sufficient to safeguard students as far as possible.

**5.15 Sexting or 'youth produced sexual imaging'** will be dealt with following the latest guidance and staff will be 'guided by the principle of proportionality and the primary concern at all times should be the welfare and protection of the young people involved. (Sexting in schools and Colleges: Responding to incidents and safeguarding young people, UK council for Child Internet Safety, January 2017.

When an incident involving youth produced sexual imagery comes to the College's attention, the incident will be referred to the DSL as soon as possible. The DSL will meet with the member of staff who was made aware of the incident and subsequently talk to the young people involved (if appropriate). Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

If at any point in the process there is a concern a young person has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately

**5.16** Students are made aware that any instance of the use of camera technology for the purpose of '**upskirting**' is a criminal offence and will be referred to the police

**5.17 Physical Intervention:** We acknowledge that staff must only ever use physical

intervention as a last resort, and that at all times it must be the minimum force necessary to prevent injury to the student, another person or property. See Physical Restraint Policy.

- 5.18 **Special Educational Needs (SEN):** We recognise that statistically children with behaviour difficulties and disabilities are most vulnerable to abuse and additional barriers can exist when recognising abuse and neglect in this group of children. Furthermore, children with SEND can be more prone to peer group isolation and may require extra pastoral support. College staff that deal with children with profound and multiple disabilities, ASD, SHD, cerebral palsy, sensory impairment and/or emotional and behavioural problems are particularly sensitive to signs of abuse. See SEN Policy.
- 5.19 **Race Equality:** We acknowledge that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. See equal opportunities policy.
- 5.20 Any reports of **child-on-child sexual violence or sexual harassment** will be managed on a case-by- case basis with stringent adherence to Part 5 of KCSIE 2023. The local authority and the NSPCC dedicated helpline will be consulted when any allegation of this nature is made and the police will always be contacted if a crime is alleged.

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe.

**Risk assessments** with regard to the victim/s, alleged perpetrator/s as well as other students involved or impacted must be carried out as an immediate priority following a child-on-child sexual violence or sexual harassment disclosure.

- 5.21 **Multi-agency information sharing** with regard to child-on-child sexual violence or sexual harassment is key.
- 5.22 Education providers have a responsibility to play their full part in local safeguarding arrangements, including where their footprint extends across several local authority areas. This includes, but should not be limited to, responding to safeguarding audits of quality and compliance, as requested by the local authority and/or local safeguarding partners.

This is to ensure that policies are consistent with the local multi-agency safeguarding arrangements and relevant legislation and/or regulations.

They should also provide staff and governor training that meets local and national safeguarding requirements.

**KCSIE (2023) Annex B makes specific reference to a number of specific forms of abuse: these are set down in Appendix 3.**

## 6 Implementation and the DSL

- 6.1 The College will ensure it has a whole-College Designated Safeguarding Lead (DSL) to take lead responsibility for safeguarding and child protection, who is a member of the Senior Leadership Team. **For the academic year 2023-24 the DSL is the Vice Principal (Pastoral & Boarding), Charlie Turner.**
- 6.2 The DSL's training is updated every two years in accordance with Government guidance. In addition to their formal training, their knowledge and skills will be updated (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments) at regular intervals, but at least annually, to keep up with any developments relevant to their role.
- 6.3 The College recognises the importance of the role of the DSL and ensures they have the time and training to undertake their duties.
- 6.4 There are contingency arrangements should the DSL not be available. Deputy DSLs are: Tunde Warren and Martyn Colliver. The deputies are trained to the same standard as the DSL.
- 6.5 Whilst the activities of the DSL can be delegated to the appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the Designated Safeguarding Lead.
- 6.6 During term time the DSL and/or a deputy will always be available to discuss any safeguarding concerns.
- 6.7 The DSL will take advice from a child protection specialist when managing complex cases (e.g. Local Authority Designated Officer LADO).
- 6.8 The DSL is responsible for coordinating action where it is suspected that a child is in need, has been harmed, or is at risk of significant harm.
- 6.9 The DSL is familiar with Coventry Safeguarding Children Partnership procedures and DFE guidance.
- 6.10 The DSL is additionally the Designated Person for Children Looked After and will attend regular review meetings involving multi-agencies, when required.
- 6.11 The DSL will liaise with the Principal and the designated safeguarding person appointed by the governors as appropriate.
- 6.12 Training for designated safeguarding leads includes understanding about different levels of need and how these need to be responded to. The College acknowledges that it plays a vital role in sharing and contributing to key information about children, including attendance data, exclusions, concerns about abuse, neglect, exploitation, and wider social and environmental factors including extra-familial contexts, which are a key aspect of keeping children safe.

## **7 Record Keeping:**

- 7.1 Single Central Register: is maintained by the Principal and the HR Manager and adheres to the statutory guidance in 'Keeping Children Safe in Education' (2023).
- 7.2 The College ensures that other organisations who provide staff to the College operate appropriate child protection checks and procedures.
- 7.3 The College also ensures that, when students attend off-site activities, effective child protection arrangements are in place.
- 7.4 All child protection concerns are recorded on 'green forms' following procedures recommended by Coventry Safeguarding Children Partnership. Staff should ensure records are factual accounts of what has been reported or observed taking place. Child protection concerns should be made to the safeguarding team as soon as possible and on the same working day as the concern was noticed. Written accounts should be completed as soon as possible. All concerns, discussions and decisions made and the reasons for those decisions are recorded in writing.
- 7.5 The green forms are filed and monitored by the Designated Safeguarding Lead. The forms are kept in a locked cabinet in the DSL's office. The green forms will result in one of the following actions, noting the thresholds for action if any laid down by the Coventry Safeguarding Children Partnership.
  - No action taken at this time.
  - Student spoken to by a member of the pastoral team and monitored in College.
  - Student spoken to by a member of the Safeguarding team and monitored in College.
  - MASH consultation or referral made to appropriate external agency, a member of the safeguarding team will take advice on appropriate communication with the student and their family from the relevant agency.
- 7.6 The member of staff making a referral to an external agency (usually a member of the safeguarding team, but ANY person can make a referral) will contact the agency based on where the student lives and complete the required agency paperwork or online form. A copy of the referral will be kept in the child protection file.
- 7.7 If a member of staff discovers that FGM appears to have been carried out on a girl under 18, they will discuss the case immediately with the DSL or a member of the safeguarding team. It is the responsibility of that member of staff to report the matter immediately to the police.
- 7.8 Child protection information is not stored in the student's main College file nor on iSAMS. All Child Protection information is stored in locked filing cabinets in the DSL's office.
- 7.9 When a student with a child protection folder moves school/college within the UK, the DSL will ensure that all relevant child protection records are sent to the receiving college or establishment. For transfers to a school or college outside the UK, guidance will be sought from the Coventry partnership.
- 7.10 Rather than a referral to children's social care, it may be appropriate to refer to Early Help services or to start the Early Help Single Assessment process. This is an early intervention process that encourages multi-agencies to work together to support children and families.



7.11 Liaison with Other Agencies: The College will work to develop effective links with relevant agencies and cooperate as required with their enquiries regarding child protection, early help and 'Prevent' matters including attendance and written reports at initial case conferences, core groups, child protection review conferences and inter-agency early help meetings.

7.12 The College will notify the local Children's Team (Social Care) if:

- it should have to exclude a student with a Child Protection Plan (whether fixed term or permanently);
- there is an unexplained absence of a student with a Child Protection Plan of more than two days duration from College (or one day following a weekend); or as agreed as part of any child protection or core group plan;
- they are concerned about the welfare of any child with a Child Protection Plan.

## **8 The Safeguarding Training of College Staff and Governors**

- 8.1 The College will provide training for all staff (including the Principal) from the point of their induction, and updated regularly, so that they know:
- a) their personal responsibilities within the College and that safeguarding is everyone's responsibility; staff should never assume that someone else will take action;
  - b) the identity and role of the Designated Safeguarding Lead together with the identities and roles of any deputy DSLs and the nominated member of the Board;
  - c) the details of the student behaviour policy including measures to prevent bullying, including cyberbullying, and prejudice-based and discriminatory bullying;
  - d) the details of the staff behaviour policy (sometimes called a code of conduct) should amongst other things, include low-level concerns, allegations against staff and whistleblowing;
  - e) the need to be vigilant in identifying cases of abuse and risk of radicalisation, the Independent Inquiry into Child Sexual Abuse (IICSA) suggests that the view that "it may well be happening here" is the appropriate attitude to adopt;
  - f) the signs of possible abuse including those online;
  - g) the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods;
  - h) their responsibilities under the Prevent Duty;
  - i) understanding of the expectations, and applicable roles and responsibilities in relation to filtering and monitoring access to the Internet;
  - j) the local and College reporting procedures;
  - k) that anyone may make a referral;
  - l) how to support and to respond to a child who tells of abuse.
- 8.2 The College will provide induction training for all new members of staff (including the Principal) which will include as well as the elements listed immediately above: the College's policies for Safeguarding including the response to be taken for children missing education (CME), Whistleblowing, Student Behaviour, and Online Safety; together with the Code of Conduct for staff and guidance on the acceptable uses of ICT and of Social Media; and also the latest edition of KCSIE Part 1.
- 8.3 All members of the designated safeguarding team will undergo full DSL training and/or refresher training as required by the local authority at least every two years, with additional training on a more regular basis, following guidance from the local authority.
- 8.4 The Board of Governors will receive training from time to time to ensure that they may fulfil their responsibilities effectively and understand the safeguarding pressures upon staff and students.
- 8.5 Teachers understand how the experiences of students can impact on their mental health, behaviour, attendance and progress at the College. Where children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout adolescence and into adulthood.

## **9 Confidentiality and Information Sharing**

- 9.1 Information sharing is critical in keeping children safe.
- 9.2 Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the DSL, member of the safeguarding team or outside agency as required (e.g. LADO or Education Safeguarding Manager).
- 9.3 All staff must be aware that they cannot promise confidentiality to a child or a parent or any other person reporting or disclosing abuse.
- 9.4 The Principal or DSL will disclose information about a student to staff only on a need-to-know basis.
- 9.5 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- 9.6 Whilst the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 place duties on organisations and individuals to process personal information fairly and lawfully, these legislations are not barriers to sharing information where the failure to do so would result in a child being placed at risk of harm.

## **10 Communication with Parents**

- 10.1 The College will undertake appropriate discussion with parents prior to involvement of another agency unless the circumstances preclude this or the relevant agency advises against communication with parents.
- 10.2 The College will ensure that parents have an understanding of the responsibility placed on the College and staff for child protection by setting out its obligations on the College website.
- 10.3 The College will ensure that parents understand that many online dangers are faced by students when at home.

## **11 Supporting the Student at Risk**

- 11.1 The College will endeavour to support the student through:
- 11.2 The approach of the curriculum will seek to encourage self-esteem and self-motivation.
- 11.3 The College ethos which promotes a positive, supportive and secure environment, and gives students a sense of being valued.
- 11.4 The College curriculum which helps students recognise and manage risks and make safer choices, including those measures to prevent bullying, including cyberbullying, and prejudice-based and discriminatory bullying
- 11.5 The College's Behaviour Policy is aimed at supporting vulnerable students at the College. All staff will agree on a consistent approach, which focuses on the behaviour of the offence committed by the child but does not damage the student's sense of self-worth. The College will ensure that the student knows that some behaviour is unacceptable but she/he is valued and not to be blamed for any abuse which has occurred.
- 11.6 The College also recognises that children may be harmed by other children. A bullying incident will be treated as a child-on-child abuse concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. There may be occasions when a student's behaviour warrants a response under this Safeguarding and Child Protection Policy rather than the College's Behaviour Policy. The College will take advice from Social Services as to the appropriate action to take and how best to support a victim of child-on-child abuse. If the nature of this child-on-child abuse is sexual violence or harassment, the College will take appropriate action as outlined in Part 5 of KCSIE (2023) and set down as section 11 within this policy. Parents will be informed as soon as possible, unless it is not in the best interests of the child to do so.
- 11.7 Liaison is vital with other agencies which support the student such as Coventry Safeguarding Children Partnership, Social Care, Child and Adolescent Mental Health Services, the Educational Psychology Service, Behaviour Support Service and the Education Social Work Service.
- 11.8 The College is committed to developing productive and supportive relationships with parents whenever it is in a student's best interest to do so.
- 11.9 The College recognises that children living in a home environment where there is a domestic violence, drug or alcohol abuse are vulnerable and in need of support and protection.
- 11.10 The College will vigilantly monitor children's welfare, keeping records and notifying Social Care as soon as there is a recurrence of a concern.
- 11.11 The College recognises that 'upskirting' is a criminal offence and may constitute sexual harassment. The College will take appropriate action if we believe this to have taken place.
- 11.12 Early help means providing support as soon as a problem emerges at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later.

- 11.13 Effective early help relies upon staff being aware of the procedures involved and also upon local agencies working together to identify children and families who would benefit from early help, to undertake an assessment of the need for early help, such as the Common Assessment Framework (CAF) or Early Help Assessment (EHA), and to provide targeted early help services to improve the outcomes for the child and prevent needs escalating to a point where intervention from children's services would be needed.
- 11.14 Inter-agency assessments should take place when a child and family would benefit from coordinated support from more than one agency (e.g. education, health, housing, police). The assessment should be undertaken by a lead professional who should provide support to the child and family and coordinate the delivery of support services. The lead professional could be a teacher, family support worker, health visitor or GP and the decision about who should be the lead professional should be informed by the child and their family. Examples of support services include family and parenting programmes, assistance with health issues and help for problems relating to drugs and alcohol.
- 11.15 For Early Help assessment to be effective:: the assessment should be undertaken with the agreement of the child and their parents and should involve the child and the family as well as the professionals working with them.; and professionals should be able to discuss concerns they may have about a child and family with a social worker in the local authority.
- 11.16 If consent is not given for an early help assessment, the designated safeguarding team should consider how the needs of the child might be met. If at any time it is considered that the child may be a child in need or that the child has suffered significant harm or is likely to do so, a referral to the local authority's children's service should be made immediately.
- 11.17 Staff should discuss emerging problems and early help requirements with the designated safeguarding team. If early help is appropriate, the designated safeguarding team will generally lead on liaising with other agencies and setting up an inter-agency assessment. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional as appropriate.
- 11.18 Any such cases should be kept under constant review and consideration given to a referral to local authority's children's service for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.
- 11.19 The designated safeguarding team is responsible for maintaining effective records of all such cases.
- 11.20 Students with special educational needs and/or disabilities (SEND):
- a) We recognise that, statistically, children with emotional and behavioural difficulties and disabilities are most vulnerable to abuse. College staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse.
  - b) The College has students with emotional and behavioural difficulties and/or challenging behaviours. The College will support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self-esteem as part of an overall behaviour support plan agreed with parents/carers.

- c) The College has students who may have learning difficulties and we are aware that they are vulnerable to abuse because they may be unable to express themselves to others. Instead such students may exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the child. Where necessary, the College will provide additional training to staff in the use of alternate communication systems. Supervision by senior managers will be vigilant to create a protective ethos around the student.
  - d) We promote high standards of practice, including ensuring that children with disabilities know how to raise concerns, and have access to a range of adults with whom they can communicate.
- 11.21 Children Missing Education (CME): All children of College age, regardless of their circumstances, are entitled to full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have.
- 11.22 Children may go missing from education in a variety of ways and in each case the College will take remedial action:
- i) They may have high rates of absenteeism
  - ii) They may go missing during the day or night whilst at College
  - iii) They may leave the College and fail to register at another place of education.
- 11.23 As indicated in Keeping Children Safe in Education, ‘a child going missing from education is a potential indicator of abuse or neglect’. Equally, a child frequently absent or absent for prolonged periods is also a potential indicator of abuse. All staff should be aware that children going missing, particularly repeatedly, may act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect (potentially sexual abuse or child criminal exploitation). It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or forced marriage. Early intervention is necessary to identify any underlying safeguarding risk and to help prevent the risks of the child going missing in future.
- 11.24 Staff working within the College know and implement the College’s policy on Missing Children, actively search for children who are missing, including working with the police where appropriate. Any child subject to a Multi-Agency Child Protection Plan who is missing without satisfactory explanation will be reported to their Key Social Worker as soon as possible and within two days in any case.
- 11.25 Staff will monitor students’ attendance through their daily register and will inform senior staff who in turn will be in touch with the local children’s services for students who are regularly absent from College or have missed 10 College days or more without permission.
- 11.26 The College will notify the local authority when a student of College age is to be deleted from the admission register.
- 11.27 Where reasonably possible, the College will hold more than one emergency contact number for each student.
- 11.28 Young people aged 16 and 17, including those with special and educational needs and disabilities, are required to participate in education or training until

they reach their 18th birthday. They are entitled to an offer of a suitable place in education or training under the September guarantee. This College will co-operate with local authorities who have a duty to identify and pay particular attention to young people who are not in education, employment or training or whose current activity is not known.

- 11.29 Where a student and their family would benefit from co-ordinated support from more than one organisation or agency (for example, education, health, housing) there should be a multi-agency assessment as set down in paragraph 131 of Working Together to Safeguard Children (WT 2023).



## **12 Drug Use and Child Protection**

12.1 The discovery that a young person is using illegal drugs or reported evidence of their drug use is not necessarily sufficient in itself to initiate child protection proceedings but the College will consider such action in the following situations:

- a) When there is evidence or reasonable cause to believe the young person's drug misuse may cause him or her to be vulnerable to other abuse such as sexual abuse.
- b) When there is evidence or reasonable cause to believe the student's drug related behaviour is a result of abusing or endangering pressure or incentives from others, particularly adults;
- c) Where the misuse is suspected of being prompted by serious parent/carer drug misuse.

12.2 Children of Drug Using Parents: further enquiries and/or further action will be taken when the College receives reliable information about drug and alcohol abuse by a child's parents/carers in the following circumstances:

- 1) a chaotic and unpredictable home environment exists which can be attributed to drug or alcohol misuse;
- 2) children are not being provided with acceptable or consistent levels of social and health care;
- 3) children are exposed to criminal behaviour.

### 13 Child-on-child abuse

Note: English law determines that anyone under the age of 18 is a child.

- 13.1 All staff should be aware that safeguarding issues can manifest themselves via child-on-child (previously referred to as peer-on peer) abuse and that such abuse frequently has a gendered nature.
- 13.2 A child-on-child concern will be treated as a child protection concern when there is reasonable cause to believe that a child is suffering or likely to suffer significant harm which may warrant referral to an external agency. In cases of any doubt at all, the local authority and the dedicated NSPCC helpline will be contacted. Where a crime is alleged the police will be contacted.
- 13.1 Child-on-child abuse includes, but may not be limited to:
- a) bullying (including cyber-bullying) noting that bullying which causes or threatens serious harm is potentially a child protection matter;
  - b) physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
  - c) sexual violence and sexual harassment;
  - d) sexting (also known as youth produced sexual imagery);
  - e) initiation/hazing type violence and rituals; and
  - f) the intimate and often covert photographing or filming of others without their consent including the criminal offence of upskirting (of students and/or staff)
  - g) harmful online challenges
- 13.2 The College will take all reasonable measures to minimise the risk of child-on-child abuse, including through personal and social development programmes, relationship and sex education, and specific actions promoted through the College's student behaviour and anti-bullying programmes.
- 13.3 Members of staff are required to report as soon as possible and certainly within one working day instances or suspected instances of child-on-child abuse to the pastoral team and/or designated safeguarding team.
- 13.4 Alleged instances of child-on-child abuse will be investigated by either the designated safeguarding team or by a member of the College's pastoral staff. If there is any doubt at all about the seriousness of the alleged abuse, especially but not only where this involves sexual violence or abuse, the designated safeguarding team will contact the relevant local authority for guidance before proceeding. Records of the investigation, including any actions taken as a result of the investigation, will be maintained by the designated safeguarding team. Disciplinary action against any student will be in accordance with the College's student behaviour policy. Appropriate support will be provided for the perpetrator as well as the victim.
- 13.5 The College policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g. cyber, racist, homophobic and gender-related bullying. A record of known and alleged bullying incidents.
- 13.6 All staff are made aware that children with SEND and/or differences or perceived differences are more susceptible to being bullied and victims of child abuse.

- 13.7 The College's anti-bullying policy promotes a climate with zero tolerance to bullying and emphasises the fact that any reliance on a defence by the bully of "banter, just a part of growing up, or just a laugh or a bit of fun" is unacceptable.
- 13.8 The College will provide through the pastoral team appropriate support for both the victims and perpetrators of child-on-child abuse. Support may include referral to the College's student counsellor or to children's services for early help. The College may also devise a student welfare risk assessment. The DSL will also listen to the student's wishes and where possible may move their classes or House if required, away from the perpetrator.

#### **14 Board of Governors Child Protection Responsibilities**

- 14.1 The Board of Governors fully recognises its responsibilities with regard to child protection and to safeguarding and promoting the welfare of children.
- 14.2 It will designate a Member of the Board for safeguarding and child protection who will ensure that there is an effective Safeguarding and child protection policy and Staff Behaviour Policy (Staff Code of Conduct) in place. The designated Member of the Board will meet with the DSL regularly and champion safeguarding and child protection issues.
- 14.3 The Board will commission external consultants to conduct reviews of safeguarding as required.
- 14.4 **The current Nominated Person for Safeguarding and Prevent Duty is Dr Mark Fenton.**
- 14.5 The Board of Governors will ensure that the College has appropriate filtering and monitoring systems in place and will regularly and at least annually review their effectiveness. They will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified so that those at risk of harm may be protected.
- 14.6 The Board of Governors will ensure that there is an appropriate level of security protection in place in order to safeguard the College's systems, staff and learners; the Board will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.
- 14.7 It will ensure an annual report is made to the Board of Governors on safeguarding matters to include changes affecting policy and procedures, the number of incidents/cases (no names) and safeguarding in the curriculum.
- 14.8 It will ensure any deficiencies in this Policy and the College's safeguarding and child protection procedures are remedied without delay.
- 14.9 If the Board of Governors provides extended College facilities or before or after College activities directly under the supervision or management of College staff, the College's arrangements for safeguarding as written in this policy shall apply.
- 14.10 The proprietor is responsible for ensuring that the Board fulfils its safeguarding responsibilities.
- 14.11 Safeguarding audits are reported to the governing body and proprietors to be shared as requested by the Lead Safeguarding Partners (LSPs).

## 15 DISCLOSES OF ABUSE OR NEGLECT

*The following strict guidance relates to any disclosures involving events within or outside the College or concerning adults or other children.*

### **Create a safe environment**

by offering the child a private and safe place if possible. Stay calm and reassure the child and stress that they are not to blame. Tell the child that you know how difficult it must have been to confide in you. If there is a need for medical attention seek assistance without delay. If there is a requirement for immediate medical intervention, assistance should be called.

### **Listen**

to what the child has to say and take them seriously. Stay calm, reassuring the child but advising that you cannot promise to keep a secret or assure confidentiality (as this may ultimately not be in the best interest of the child).

A suggested form of words that may help when talking to children are as follows: *"I will keep our conversation confidential and agree with you what information I can share, unless you tell me something that will affect your personal safety or that is illegal, but I will tell you if I am going to pass information on and who to."*

Tell the child what you are going to do next after the disclosure.

### **When talking to the child,**

do not interview the child and keep questions to a minimum. Encourage the child to use his/her own words and do not ask leading questions, interrupt their dialogue or make assumptions, which might give particular answers.

Do not repeat the disclosure or ask the child to repeat his or her disclosure other than to clarify what is being said. Do not display shock or disbelief.

Seek consent from the child to share any information disclosed but should consent not be given, an explanation can be given as to why the DSL must be told.

### **Record**

in detail the circumstances and timings of the disclosure including the nature and extent of any injuries, explanations given by the child (as much as possible in the child's own words) and the action taken (which may be used in any subsequent court proceedings), within 24 hours of the disclosure.

After the disclosure **record in writing** the child's name, address and date of birth along with the child's behaviour and emotional state, who else was present at the time of the disclosure. Sign (with time and date) all notes made and give them to the DSL. When the child has finished speaking, if appropriate do not leave the child alone but speak to someone who can help keep the child safe.

Call for immediate assistance from the DSL or Deputy DSL or follow the procedures for allegations against staff, volunteers, and Proprietors.

The DSL (or other responsible person within the scope of this policy) will then deal with the matter.

Do not ask the child to repeat what they have said to the DSL. The child has chosen to tell you as a member of staff. It will be for the DSL and others to determine what should happen next.

The official College safeguarding form should also be completed by the person who receives the allegation and forwarded to the DSL.

***Do not take responsibility***

for investigating the allegation yourself as investigation is the sole statutory responsibility of Children's Services and/or the police. Do not attempt to contact in any way any person mentioned in the disclosure. Reassure the child that you will ensure the matter will be dealt with.

***Immediately consult the DSL***

so that any appropriate action can be taken to protect the student if necessary. Only tell those people that it is necessary to inform; the DSL will consider the information and decide on the next steps.

Until otherwise directed by the DSL, do not speak to anyone about the fact or content of the disclosure.

Every complaint or suspicion of abuse from within or outside the College will be taken seriously and action taken in accordance with this policy.

In all cases, no investigation will take place without receiving explicit guidance from the local authority and/or police.

***Never***

take photographs of injuries or examine marks and injuries solely to assess whether they may have been caused by abuse or investigate or probe, aiming to prove or disprove possible abuse. Do not view any part of the body normally covered by clothing.

***Do not assume***

that someone else will take the necessary action. Do not speculate or accuse anybody, confront another person (adult or child) allegedly involved, offer opinions about what is being said or about people allegedly involved or forget to record what you have been told.

***Never***

fail to pass the information on to the correct person.

**Remember: anyone may make a referral to the local children's services and/or police.**

## 16 ALLEGATIONS AGAINST STAFF, SUPPLY STAFF, VOLUNTEERS, DSLS AND THE PROPRIETOR

This applies where an adult within the College community has allegedly behaved in a way that has harmed, may have harmed or poses a risk of harm to a child or have possibly committed a criminal offence against or related to a child.

**Even if the concern might be regarded as low-level or a niggling doubt about conduct, this guidance must be followed:**

**Allegations concerning all other than the Principal including supply staff** are to be reported straight away to the Principal who will immediately contact the LADO to discuss the allegation and act on the advice provided. The individual against whom the allegation is made is not to be informed.

**Allegations concerning the Principal** are to be reported straight away to the Chair of Governors, Michael O'Sullivan who will immediately contact the LADO to discuss the allegation and act on the advice provided. The Principal is not to be informed.

**Allegations concerning a member of the Board of Governors** are to be reported straight away to the Principal who will immediately contact the LADO to discuss the allegation and act on the advice provided. The individual against whom the allegation is made is not to be informed.

In all cases, no investigation will take place without receiving explicit guidance from the LADO and/or police.

All concerns however low-level will be recorded in order that any patterns may be discerned; and the College will endeavour to learn lessons from both unsubstantiated as well as substantiated allegations and concerns.

### **Definition of low-level concerns**

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the College may have acted in a way that:

Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- 1) Being overly friendly with students
- 2) Having favourites
- 3) Taking photographs of students on mobile phones or other devices
- 4) Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- 5) Using inappropriate sexualised, intimidating or offensive language

## **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust and transparency where the College's values and expected behaviour are set out in the staff code of conduct and are constantly lived, monitored and reinforced by all staff and where all staff are encouraged to share low-level concerns so that they can be addressed appropriately. Low level concerns should be reported using the Neutral Notification Form found in the self-service app or via this link <https://forms.office.com/e/NDHeRQVude>

We will create this culture by:

Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

- a) Empowering staff to share any low-level concerns they may have about other staff
- b) Empowering staff to self-refer
- c) Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- d) Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- e) Helping to identify any weakness in the College's safeguarding system

The College actively encourages all members of its community, staff, pupils and parents to participate in discussions about College life and actions that can be taken to improve life in College for all. Students are encouraged to talk openly and to discuss any worries they may have.

## **Responding to low-level concerns**

If the concern is raised via a third party, the Principal will collect evidence where necessary by speaking:

- 1) Directly to the person who raised the concern, unless it has been raised anonymously
- 2) To the individual involved and any witnesses

The Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the College staff code of conduct.

Staff are encouraged to come forward with any concern they may have, no matter how small it may seem. They may choose to discuss this with the DSL in the first instance or in situations where the Principal is not immediately available. All low-level concerns raised in this way will be passed on to the Principal at the earliest possible opportunity.

Reports of low level concerns should be recorded in writing, with details taken of the concern, the context in which it arose and action taken. The name of the person reporting should be noted, respecting wishes to remain anonymous as far as reasonably possible. Records of low level concerns should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to.

Where a pattern of behaviour is identified, the College will decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met. The College must consider if there are any wider cultural issues in College that enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence. The rationale for all decisions and actions taken must be recorded.



**All unnecessary delays should be eradicated and inaction at any level can and should be challenged.**

In each case above, the LADO will be given enough detail to allow consideration of the nature, content and context of the allegation and to agree a course of action including any involvement of the police.

The Police will be informed if a criminal offence is alleged.

Guidance will also be sought from the LADO and/or police to enable the College to decide about whether the person against whom an allegation has been made should be allowed to remain on College premises and if so what, if any, conditions should apply.

If the College were given information that suggested that a member of staff was abusing a student who is not a student at the College, the DSL would immediately report to the LADO and follow the procedure as if it were one of our own students.

In borderline cases, where there is room for doubt as to whether a referral should be made, the DSL will consult with the LADO on a no names basis without identifying the individuals. T

he College will not investigate allegations without first gaining the agreement of the LADO. In the case of serious harm, the police will be informed from the outset.

Discussions will be recorded in writing, with any communication with both the individual and the parents of the child/children agreed.

Arrangements for alternative accommodation, away from children, would be applied in cases where a member of the boarding staff is suspended pending an investigation of a child protection nature.

The College will make every effort to maintain confidentiality and guard against publicity if there are allegations against teachers or staff up to the point where the accused person is charged with an offence.

Anyone may make a referral to the local children's services and/or police.

## APPENDIX 1 - Types of Abuse and Neglect Including Specific Safeguarding Issues

We are aware that abuse, neglect 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 and could include:

*Abuse and neglect; Neglect (physical or emotional); Physical abuse; Emotional abuse; Peer abuse; Extremism/radicalisation; Domestic violence; Drug/alcohol abuse; Emotional abuse; Abuse of trust; Sexual abuse; Children who sexually abuse; Witnessing domestic abuse or violence; Child sexual exploitation (CSE); Child exploitation and e-safety; Student sexual exploitation; Student exploitation and e-safety; Female genital mutilation (FGM); Forced marriages; Fabricated or induced illness; Faith abuse; Safeguarding disabled children; Disability and vulnerability; Honour-based violence vulnerable groups; Bullying including cyberbullying; Vulnerable students; Children in need; Child missing education (Children who run away or go missing); Child missing from home or care; Missing children and adults strategy; Young carers; Cared for children and significant harm; Gangs and youth violence; Gender-based violence/violence against women and girls (VAWG); Hate; Mental health; Private fostering; Preventing radicalisation; Teenage relationship abuse; Sexting; Trafficking.*

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

### The nature of physical abuse:

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* (e.g. shins). Injuries on the *soft* areas of the body are more likely to be inflicted intentionally. If a body map is to be used to record physical abuse, they should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the College.

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

- a) Multiple bruising or bruises and scratches/bi-lateral injuries (especially on the head and face including around the mouth); clusters of bruises—e.g. fingertip bruising (caused by being grasped); bruises around the neck and behind the ears—the most common abusive injuries are to the head.
- b) Marks indicating injury by an instrument—e.g. linear bruising (stick), parallel bruising (belt), marks of a buckle;
- c) Bite marks; deliberate burning may also be indicated by the pattern of an instrument or object—e.g., electric fire, cooker, cigarette; scalds with upward splash marks or *tide marks*; untreated injuries; injuries to genital areas;
- d) Recurrent injuries, burns or bald patches; having broken bones or unexplained bruising, burns or welts in different stages of healing; being unable to explain an injury, or providing explanations that are inconsistent, vague or unbelievable.

**Emotional abuse:**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

It may involve conveying to a child that they are worthless or valued only insofar as they meet the needs of another person.

It may include not giving the child opportunities to express their own views, deliberately silencing them or 'making fun' of what they say, or they communicate. These may include interactions or expectations which are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

This can also occur when a child is a young carer for a parent who is disabled, has mental health problems, or misuses alcohol or drugs.

It may involve seeing or hearing the ill treatment of another, for example where there is fighting or violence in the home.

It may involve serious bullying (including cyber 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, although it may occur alone.

**The nature of emotional abuse:**

Most harm is produced in *low warmth, high criticism* homes, not from single incidents. Emotional abuse is chronic and cumulative and has a long-term impact.

All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.

Witnessing someone harming another person—as in domestic violence, can harm children. It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children.

An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later.

**Indicators of emotional abuse:**

Developmental issues include delays in physical, mental and emotional development; poor College performance and speech disorders, particularly sudden disorders or changes.

**Neglect****Behavioural indicators of neglect include:**

Constant tiredness; frequent absence from College/lateness or arriving early at College/leaving late; missing medical appointments; being frequently unsupervised; compulsive stealing or scavenging, especially food and having destructive tendencies; running away.

acceptance of punishment which appears excessive; over-reaction to mistakes; continual self-deprecation (I'm stupid, ugly, worthless etc); self-mutilation; suicide attempts; drug/solvent abuse; running away; acting out; poor trust in significant adults; regressive behaviour – e.g. wetting; eating disorders; destructive tendencies; neurotic behaviour (such as rick, hair-

twisting, thumb sucking).

**Social issues:**

withdrawal from physical contact or from social interaction; over-compliant behaviour or insecure, clinging behaviour; poor social relationships.

**Emotional responses:**

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

**The nature of sexual abuse:**

Sexual abuse is often perpetrated by people who are known and trusted by the child—e.g., relatives, family friends, neighbours, babysitters, and people working with the child in College, faith settings, clubs or activities.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the Internet). Sexual abuse can be committed by anybody, including women and children as well as adult males. Where it comes to our notice that a student under the age of 13 is, or may be, sexually active, this will result in an immediate referral to Children’s Services and advice being given to the DSL. This will determine how and when information will be shared with parents/guardians/carers and the investigating agencies.

**Child sexual exploitation**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur using technology.

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

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

from certain people or avoiding being alone with someone; displaying sexual behaviour that is inappropriate for their age.

- d) Inappropriate masturbation or self-harm (including eating disorders) and an unwillingness to remove clothes when changing for PE etc.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including Cyber Bullying and grooming. It is also important to recognise that some young people who are being sexually exploited or abused do not exhibit any external signs of this abuse.

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

#### **Indicators of sexual abuse: Physical observations include**

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

#### **Youth produced sexual imagery (Sexting)**

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. The DfE provides searching screening and confiscation advice for Colleges. The UK Council for Child Internet Safety (UKCCIS) Education Group has recently published sexting advice for schools and Colleges.

However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal. Youth produced sexual imagery refers to both images and videos where a person under the age of 18:

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

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance 'Sexting in schools and Colleges: responding to incidents and safeguarding young people'.

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.

If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if

this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery.

The DSL should hold an initial review meeting with appropriate College staff and subsequent interviews with the children involved (if appropriate).

Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm.

At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to Children's Social Care or the Police as appropriate.

Immediate referral at the initial review stage should be made to Children's Social Care/Police if:

- i) The incident involves an adult;
- ii) There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs);
- iii) What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent;
- iv) The imagery involves sexual acts;
- v) The imagery involves anyone aged 12 or under;
- vi) There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above applies then the DSL will use their professional judgement to assess the risk to students involved and may decide, with input from the Principal, to respond to the incident without escalation to Children's Social Care or the police. The following should be noted:

## **UPSKIRTING**

typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause the victim humiliation, distress or alarm. It is now a criminal offence and may constitute sexual harassment.

## **NEGLECT**

is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Far more children are registered to the category of neglect on Child Protection Plans than to the other categories.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more

slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children would suggest that an appropriate intervention or conversation at this early stage could address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns College staff have should at least be discussed with the DSL.

#### **Indicators of neglect:**

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused.

Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons.

What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself.

#### **Physical indicators of neglect include:**

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

#### **Specific safeguarding issues:**

Our staff are informed of safeguarding issues, some of which are listed below. They are aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger. Our staff are aware safeguarding issues manifest themselves via child-on-child abuse.

This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults and sexting. Our staff are clear as to the College's policy and procedures with regards to child-on-child abuse.

### **CHILD-ON-CHILD ABUSE**

Our staff are clear as to the College's policy and procedures with regards to child-on child abuse and we follow KCSIE and WT. See the main text of this policy.

#### **Sexual Assault:**

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

#### **Causing someone to engage in sexual activity without consent:**

A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch

themselves sexually, or to engage in sexual activity with a third party.)

### **What is consent?**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom.

Consent can be withdrawn at any time during sexual activity and each time activity occurs.

Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

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

### **SEXUAL HARASSMENT**

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include: consensual and non-consensual sharing of nude and semi-nude images and/or videos. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;

- upskirting (is a criminal offence);
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats.

Part 5 of KCSIE contains valuable advice of how to deal with situations where the victim and alleged perpetrator remain in the same school together.



## **FEMALE GENITAL MUTILATION (FGM)**

This comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

**Circumstances / symptoms that may point to FGM happening include:**

- A child talking about getting ready for a special ceremony; a child's family taking a long trip abroad
- A child's family being one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan);
- Knowledge that a sibling has undergone FGM; a child talking about going abroad to be 'cut' or to prepare for marriage; difficulty in walking, sitting or standing; spending lengthier time in the bathroom/toilet than usual;
- Unusual behaviour after a College absence/reluctance to undertake usual medical examinations; and
- Asking for help, but not detailing the problem in full due to fear or embarrassment.

**Mandatory reporting duty:** Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Teachers **must** personally report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, he or she should also still consider and discuss any such case with the College DSL and involve Children's Services as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

**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 Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBA are clear examples of abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

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

forced marriage.

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

**FORCED MARRIAGE:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered 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 a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where he or she cannot consent (if the child has learning disabilities, for example). Nevertheless, some communities use religion and culture to coerce a person into marriage. Colleges and Colleges can play an important role in safeguarding children from forced marriage. The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of Colleges and Colleges. College and College staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: [fmfco.gov.uk](mailto:fmfco.gov.uk).

#### **PRIVATE FOSTERING ARRANGEMENTS:**

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential Colleges, children's homes or hospitals are not considered to be privately fostered. Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

The College recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes aware that a student may be in a private fostering arrangement they will raise this with the DSL and the DSL will notify Coventry Children's Services of the circumstances.

#### **DOMESTIC ABUSE:**

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

Significant harm from domestic abuse can include: physical violence, emotional abuse, sexual abuse, and financial abuse.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long- lasting emotional and psychological impact on children. Child safeguarding procedures will be followed and support will be offered in school. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Children will sometimes blame themselves when they hear or see violent words or actions in the home; just hearing a violent quarrel will seriously unsettle many children.

Staff training will include guidance on the impact of domestic violence on children.

If a member of staff is concerned that domestic abuse is occurring within a family or relationship, they should inform the DSL who will consider a referral to Coventry MASH and/or the Police as necessary.

If a student has disclosed witnessing domestic violence or it is suspected that the student may be living in a household that is affected by family violence, this will be referred to the DSL as a safeguarding issue. In circumstances where there have been 3 known incidents of domestic abuse, a referral must be made to Coventry MASH. In December 2015 a new criminal offence of coercive and controlling behaviour came into force in England and Wales.

This means that repeated patterns of non-physical behaviour (emotional abuse and control) within relationships are now considered a criminal offence capable of prosecution. For the offence to apply, criteria must be met.

**Operation Encompass:** Operation Encompass is a national system operating in the majority of police forces across England. When the police have been called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (the DSL) at the College. This ensure that the school has up to date information about the child's circumstances and can offer support to the child according to their needs.

## **BULLYING:**

Please also refer to our Anti-Bullying Policy that sets out our procedures to prevent bullying and to deal with it if it occurs within the College. This may be defined as deliberate, repeated (systematic) aggressive verbal, psychological or physical conduct by an individual or group against another person or persons. However, bullying may also occur without repetition. Very often bullying is the act of oppressing or dominating by threat or force where the aggressor may persecute or tease physically or morally to frighten into action or inaction.

Bullying can include:

- Physical: pushing, hitting, kicking, pinching etc.;
- Verbal: name-calling, spreading rumours, constant teasing and sarcasm;
- Emotional: tormenting, ridiculing, humiliating, ignoring;
- Racial: taunts, graffiti and gestures; Religious / cultural;
- Sexual, sexist or homophobic: unwanted physical contact or abusive comments;

Cyber-bullying: through social networking websites, mobile phones and text messages, photographs and email, harmful online challenges.

Signs that may indicate bullying:

- Behavioural changes such as reduced concentration, becoming withdrawn, depressed, tearful, emotionally up and down, reluctance to go to College etc.; a marked drop off in performance at College;
- Physical signs such as stomach aches, headaches, difficulties in sleeping, bingeing on food, cigarettes or alcohol and a shortage of money or frequent loss of possessions.

### **SELF-HARM AND SUICIDAL BEHAVIOUR:**

Self-harm can be deliberate with the aim of a child just causing him or herself an injury, attempted suicide that does not result in end of life or a successful attempt to end life resulting in death.

Most self-harmers keep it a secret that goes undiscovered, finding it is the only way to express their feelings.

Children self-harm for many reasons including: being bullied both at College or online, mental health issues, eating disorders, domestic abuse, any type of child abuse, parental conflict and bereavement.

**The signs of the distress** the child may be under can take many forms and can include:

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

During a disclosure of self-harm, staff should check whether the student has ingested anything or has anything on his or her person that could cause damage or harm.

Any concerns from staff members should be referred to the DSL, as an early help assessment may need to be completed to involve services that can help, or in the case of significant harm a referral can be made to Children's Services.

### **RADICALISATION:**

KCSIE define radicalisation as 'the process by which a person comes to support terrorism and forms of extremism.

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.'

There is no single way of identifying an individual who is likely to be susceptible to an

extremist ideology. It can happen in many different ways and settings.

Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer.

The Internet and the use of social media in particular has become a major factor in the radicalisation of young people.

## **APPENDIX 2 - THE ROLE OF THE LOCAL AUTHORITY DESIGNATED OFFICER (LADO)**

The role of the LADO is set out in *Working Together to Safeguard Children (2023)* and is governed by the Authorities duties under section 11 of the Children Act 2004 and LSCB Inter-Agency Policy and Procedures. This guidance outlines procedures for managing allegations against people who work with children who are paid, unpaid, volunteers, casual, agency or anyone self-employed.

The LADO must be contacted within one working day in respect of all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

There may be up to three strands in the consideration of an allegation:

- a police investigation of a possible criminal offence;
- enquiries and assessment by children's social care about whether a child is in need of protection or in need of services;
- consideration by an employer of disciplinary action in respect of the individual.

The LADO is responsible for:

- Providing advice, information and guidance to employers and voluntary organisations around allegations and concerns regarding paid and unpaid workers.
- Managing and overseeing individual cases from all partner agencies.
- Ensuring the child's voice is heard and that they are safeguarded.
- Ensuring there is a consistent, fair and thorough process for all adults working with children and young people against whom an allegation is made.
- Monitoring the progress of cases to ensure they are dealt with as quickly as possible.
- Recommending a referral and chairing the strategy meeting in cases where the allegation requires investigation by police and/or social care.

The LADO is involved from the initial phase of the allegation through to the conclusion of the case. The LADO is available to discuss any concerns and to assist the College in deciding whether there is a need to make a referral and/or take any immediate management action to protect a child.

## **APPENDIX 3 – Additional concerns and forms of abuse specified by KCSIE**

### **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 or college can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

### **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. There are two age-appropriate guides to support children 5-11-year olds and 12-17 year olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### **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. Independent Child Trafficking Guardians (ICTG) are an independent source of advice for children who have been trafficked and somebody who can speak up on their behalf.

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 ([www.gov.uk](http://www.gov.uk))

## **Cybercrime**

Children with particular skills 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 designated safeguarding lead (or a deputy), should 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. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

### **Child Criminal Exploitation (CCE):**

Child Criminal Exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator, and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can occur through the use of technology. Examples of CCE include: being coerced into moving drugs across the country (county lines), being forced to shoplift or being forced to threaten other young people.

Again, as with CSE, this imbalance may arise from a range of factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic and other resources.

### **The criminal exploitation of children: COUNTY LINES**

Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Signs which may indicate criminal exploitation: persistently going missing from school or home or regularly coming home late and / or being found out-of-area; unexplained acquisition of money, clothes, or mobile phones; access to or carrying an unusual number of mobile phones; excessive receipt of texts /phone calls; relationships with controlling /older individuals or groups; associating with other young people involved in exploitation; leaving home / care without explanation; suspicion of physical assault /unexplained injuries; parental concerns; carrying weapons; misusing drugs or alcohol; significant decline in school results / performance; gang association or isolation from peers or social networks and self-harm or significant changes in emotional well-being

Criminal exploitation of children is a Safeguarding concern and will require a discussion with the Designated Safeguarding Lead who will seek advice from agencies and professionals; including, reference to the Safeguarding procedures as outlined by the local authority. This will mean a referral into the Police and Social Care. The College will offer support to a victim.

### **Carrying knives/offensive Weapons & Gang Culture**

Bringing and carrying a knife/offensive weapon onto College premises is a criminal offence and



immediate action will be taken by calling the police. The guidance on *Searching, Screening and Confiscation for Head teachers, schools and Governors*, January 2018 will be consulted and the College will consider and may apply the disciplinary procedure.

If a member of staff suspects a student of being involved in gang culture, this is a safeguarding concern and will require a discussion with the Designated Safeguarding Lead who will seek advice from agencies and professionals including reference to the Safeguarding procedures as outlined by the local authority. The pupil may be an exploited child and victim to which the College will offer support.

**Vice Principal (Pastoral & Boarding) & Designated Safeguarding Lead**

**Charlie Turner**

Date of Review: February 2024

Date of Next Review: September 2024

## Document Details

Information Sharing Category	Public Domain
Version	V10
Authorised by (if required)	Principal, Governor's Nominated Person
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Responsible Area	Safeguarding Team

## Amendments

Date	Amendment
21/02/2024	Updates incorporating Working Together 2023 and reorganisation to improve clarity and accessibility
20/09/2023	Updates related to KSCIE 2023 in relation to filtering & children missing in education
12/06/2023	Updates related to KSCIE 2023
31/08/2022	Updates related to KSCIE 2022
22/3/2022	Amended presentation template Removed COVID addendum  Added details on Sexual Violence and Harassment  Updated references to Board of Governors, and Designated contact governor
05/01/2022	Updated LADO contact details
14/09/2021	Updated LADO contact details
01/09/2021	Updated DSL list
01/04/2021	Removed C.Earle and added details about NSPCC helplines
30/01/2021	Revisions/update following audit and KSCIE Jan 2021 amendments
25/11/2020	Updated DSL list
02/09/2020	Updated in line with the Keeping Children Safe in Education 2020. Updates include the definition of safeguarding and emphasis on student mental health.
1/5/2020	Updated LADO contact details
20/03/2020	Addendum for COVID-19 school closure arrangements for Safeguarding and Child Protection

02/09/2019	Updated in line with the Keeping Children Safe in Education 2019. Updates include the addition of the definition of Upskirting and its inclusion under Child-on-child Abuse.
03/09/2018	'Keeping children safe in education'. Updates include changes to information for all staff (part 1) and the management of safeguarding (part 2) and a new section covering child on child sexual violence and sexual harassment (part 5). Annex H provides a table of all changes.
01/03/2017	Updated Child Sexual Exploitation (CSE) as per new statutory definition provided in Appendix A: page 93 of the Glossary of <i>Working Together to Safeguard Children</i> (WTTSC) (HM Govt: 2015, updated February 17 and July 18).