

Norton College (Tewkesbury) Limited

Child Protection and Safeguarding Policy

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Signed by:

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Statement of intent

Norton College (Tewkesbury) Limited is committed to safeguarding and promoting the physical, mental and emotional welfare of every student, both inside and outside of the college premises. We implement a whole-college preventative approach to managing safeguarding concerns, ensuring that the wellbeing of students is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the Board of Directors, the Acting Head of School and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL.
- Teaching students how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any student that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

The DSL is **Anna Phillips**. In the absence of the DSL, child protection matters will be dealt with by the deputy DSL, **Helen Ferguson**.

Acronyms

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for students who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the student.

ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.

PSHE	Personal, social and health education	A non-statutory subject in which students learn about themselves, other people, rights, responsibilities and relationships.
PHE	Public Health England	An executive agency of the Department of Health and Social Care which aims to protect and improve the nation's health and wellbeing.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all students. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to students with special educational needs.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.

1. Definitions

The terms “**children**” and “**child**” refer to anyone under the age of 18.

For the purposes of this policy, “**safeguarding and protecting the welfare of children**” is defined as:

- Protecting students from maltreatment.
- Preventing the impairment of students’ mental and physical health or development.
- Ensuring that students grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all students to have the best outcomes.

For the purposes of this policy, “**consent**” is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, “**sexual violence**” refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause 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.

For the purposes of this policy, “**sexual harassment**” refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of the college. Sexual harassment is likely to violate a student’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.

- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
 - Sharing unwanted explicit content.
 - Upskirting.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation, coercion, and threats.

For the purposes of this policy, “**upskirting**” refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including students and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, the “**consensual and non-consensual sharing of nude and semi-nude images and/or videos**”, colloquially known as “**sexting**”, is defined as the sharing between students of sexually explicit content, including indecent imagery. For the purposes of this policy, “**indecent imagery**” is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

2. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018

- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021

Statutory guidance

- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2013) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- DfE (2021) 'Keeping children safe in education 2021'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2015) 'The Prevent duty'
- DfE (2018) 'Disqualification under the Childcare Act 2006'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2017) 'Child sexual exploitation'
- DfE (2021) 'Sexual violence and sexual harassment between children in schools and colleges'
- DfE (2021) 'Recruit teachers from overseas'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'

3. Roles and responsibilities

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the student.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which students can learn.
- Be prepared to identify students who may benefit from early help.
- Be aware of the college's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training, during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.

- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put students at risk of harm.
- Be aware of behaviours linked to issues such as drug-taking, alcohol misuse, deliberately missing education, and sharing indecent images, and other signs that students may be at risk of harm.

Teachers and the Executive Headteacher, have a responsibility to:

- Safeguard students' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.

The Board of Directors has a duty to:

- Take strategic leadership responsibility for the college's safeguarding arrangements.
- Ensure that the college complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the college are effective and comply with the law at all times.
- Guarantee that the college contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirm that the college's safeguarding arrangements take into account the procedures and practices of the relevant LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the college's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that staff working directly with children read at least Part one of KCSIE.
- Ensure that staff who do not work directly with children read either Part one or Annex A of KCSIE.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).

- Facilitate a whole-college approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the student's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place for students to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the Board of Directors is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Acting Head of School or another Director.
- Guarantee that there are effective and appropriate policies and procedures in place.
- Ensure all relevant persons are aware of the college's local safeguarding arrangements, including the Board of Directors itself, the SLT and DSL.
- Make sure that students are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff are appropriately trained to support students to be themselves at college, e.g. if they are LGBTQ+.
- Ensure the college has clear systems and processes in place for identifying possible mental health problems in students, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle students' allegations against other students.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of students and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.
- Guarantee that there are systems in place for students to express their views and give feedback.

- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated Senior Leader to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated Senior Leader works with the virtual school head (VSH) to discuss how the pupil premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the student's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for students who go missing from college, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the Board of Directors have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.

The Acting Head of School has a duty to:

- Ensure that the policies and procedures adopted by the Board of Directors, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff with the appropriate policies and information upon induction.

The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of students, and/or support other staff to do so.
- During term time, be available during college hours for staff to discuss any safeguarding concerns.
- Arrange, alongside the college, adequate and appropriate cover for any activities outside of college hours or terms.
- Refer cases:
 - To CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.
 - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
 - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
 - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.

- Liaise with the Acting Head of School to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSL to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officer (LADO) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that student's needs are considered holistically.
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the Acting Head of School and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at college. This includes:
 - Ensuring that the college knows which students have or have had a social worker.
 - Understanding the academic progress and attainment of these students.
 - Maintaining a culture of high aspirations for these students.
 - Supporting teachers to provide additional academic support or reasonable adjustments to help these students reach their potential.
 - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these students are experiencing with teachers/tutors and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a student's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.
- Ensure each member of staff has access to and understands the college's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the Board of Directors to ensure the college's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure the college's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the college may make referrals for suspected cases of abuse or neglect, as well as the role the college plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training, and update this training at least every two years.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to students and taking account of their wishes and feelings; this includes understanding the difficulties students may have in approaching

staff about their circumstances and considering how to build trusted relationships that facilitate communication.

- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within college, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of concerns and referrals, and understand the purpose of this record-keeping.

The designated teacher has a responsibility for promoting the educational achievement of LAC and previously LAC (PLAC), and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

4. Multi-agency working

The college contributes to multi-agency working as part of its statutory duty. The college is aware of and will follow the local safeguarding arrangements.

The college will be fully engaged, involved, and included in local safeguarding arrangements. Once the college is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. The college will act in accordance with the safeguarding arrangements.

The college will work with CSCS, the police, health services and other services to protect the welfare of its students, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for early help is identified, the college will allow access for CSCS from the host LA or a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

The college also recognises the particular importance of inter-agency working in identifying and preventing CSE.

Information sharing

The college recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet students' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection

regulations do not act as a barrier to sharing information where failure to do so would result in the student being placed at risk of harm.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of students. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL(s).

5. Early help

Early help means providing support as soon as a problem emerges, at any point in a child's life. Any student may benefit from early help, but in particular, staff will be alert to the potential need for early help for students who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in prison, or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Misuse drugs or alcohol.
- Have returned home to their family from care.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Are persistently absent from education, including persistent absences for part of the college day.
- Show early signs of abuse and/or neglect in other ways.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the student's situation is not improving or is worsening.

6. Abuse and neglect

For the purposes of this policy, “**abuse**” is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, “**physical abuse**” is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, “**emotional abuse**” is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently 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, but it may also occur alone.

For the purposes of this policy, “**sexual abuse**” is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, “**neglect**” is defined as the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in serious impairment of a child’s health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

All staff will be aware of the indicators of abuse and neglect. All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSL, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between students outside of these environments; this includes being aware that students can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a student being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

7. Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, “**domestic abuse**” is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person’s child) where both are aged 16 or over and are personally connected. “**Abusive behaviour**” includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. “**Personally connected**” includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The college will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

8. Homelessness

The DSL and deputy DSL will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because “they have to”.

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

9. Children missing from education

A child going missing from college is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation. Staff will monitor students that go missing from the college, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing Education Policy. The college will inform the relevant LA of any student who fails to attend regularly or has been absent without the college’s permission for a continuous period of 10 college days or more.

Admissions register

Students are placed on the admissions register at the beginning of the first day that is agreed by the college, or when the college has been notified that the student will first be attending.

The college will ensure that the admissions register is kept up-to-date and accurate at all times. Two emergency contact details will be held for each student where possible. Staff will monitor students who do not attend the college on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the college that their child will live at a different address, the college will record the following information on the admissions register:

- The full name of the parent with whom the student will live
- The new address
- The date from when the student will live at that address

If a parent notifies the college that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the student first attended, or is due to attend, that school

Where a student moves to a new school, the college will use a secure internet system to securely transfer students' data.

To ensure accurate data is collected to allow effective safeguarding, the college will inform the LA of any student who is going to be deleted from the admission register, in accordance with the Education (Student Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the college by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the college, and no longer live within a reasonable distance of the premises.
- Have been in custody for a period of more than four months due to a final court order and the college does not reasonably believe they will be returning to the college at the end of that period.
- Have been permanently excluded.

The college will also remove a student from the admissions register where they and the LA has been unable to establish the student's whereabouts after making reasonable enquiries into their attendance.

If a student is to be removed from the admissions register, the college will provide the LA with the following information:

- The full name of the student
- The full name and address of any parent with whom the student lives
- At least one telephone number of the parent with whom the student lives

- The full name and address of the parent with whom the student is going to live, and the date that the student will start living there, if applicable
- The name of the student's new school and the student's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Student Registration) (England) Regulations 2006 (as amended)

The college will work with the LA to establish methods of making returns for students back into the college. The college will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The college will also highlight any other necessary contextual information, including safeguarding concerns.

10. Child abduction and community safety incidents

For the purposes of this policy, “**child abduction**” is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the college that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with students.

Students will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

11. Child criminal exploitation (CCE)

For the purposes of this policy, “**child criminal exploitation**” is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The college will recognise that students involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The college will also recognise that students of any gender are at risk of CCE.

College staff will be aware of the indicators that a student is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.

- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.

County lines

For the purposes of this policy, “**county lines**” refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, college staff will be aware of the specific indicators that a student may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a ‘debt bond’ to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of students with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a student may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

12. Cyber-crime

For the purposes of this policy, “**cyber-crime**” is defined as criminal activity committed using computers and/or the internet. This includes ‘cyber-enabled’ crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and ‘cyber-dependent’ crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as ‘hacking’.
- Denial of Service attacks, known as ‘booting’.
- Making, supplying or obtaining malicious software, or ‘malware’, e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring students to the National Crime Agency's Cyber Choices programme.

13. Child sexual exploitation (CSE)

For the purposes of this policy, “**child sexual exploitation**” is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

The college will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the student's immediate knowledge, e.g. through others sharing videos or images of them on social media. The college will recognise that CSE can affect any student who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes students aged 16 and above who can legally consent to sexual activity. The college will also recognise that students may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

College staff will be aware of the key indicators that a student is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.
- Having older boyfriends or girlfriends.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

All concerns related to CSE will be managed in line with the college's Child Sexual Exploitation (CSE) Policy.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the relevant LA. The LA and all other necessary authorities will then handle the matter to conclusion. The college will cooperate as needed.

14. Modern slavery

For the purposes of this policy, “**modern slavery**” encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a student may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

15. FGM

For the purposes of this policy, “**FGM**” is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a student being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The college’s procedures relating to managing cases of FGM and protecting students will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a student under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine students, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate.

All staff will be aware of the indicators that students may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the student. It is important to note that the student may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a student may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The student coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a ‘special procedure’ or a ceremony to ‘become a woman’.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the student:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from college, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of “**honour-based’ abuse (HBA)**”, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

16. Forced marriage

For the purposes of this policy, a “**forced marriage**” is defined as a marriage that is entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Threats can be physical, emotional, or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND. Forced marriage is a crime in the UK and a form of HBA.

All staff will be alert to the indicators that a student is at risk of, or has undergone, forced marriage, including, but not limited to, the student:

- Becoming anxious, depressed and emotionally withdrawn with low self-esteem.
- Showing signs of mental health disorders and behaviours such as self-harm or anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.
- Regularly being absent from college.
- Displaying a decline in punctuality.
- An obvious family history of older siblings leaving education early and marrying early.

Staff who have any concerns regarding a student who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit.

17. Radicalisation

For the purposes of this policy, “**extremism**” refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, “**radicalisation**” refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, “**terrorism**” refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting students from the risk of radicalisation is part of the college’s wider safeguarding duties. The college will actively assess the risk of students being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in students’ behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify students who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The college will work with local safeguarding arrangements as appropriate.

The college will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the college will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the student’s parents, unless the college has reason to believe that the student would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect students against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have “due regard to the need to prevent people from being drawn into terrorism”, known as “**the Prevent duty**”. The Prevent duty will form part of the college’s wider safeguarding obligations.

The college’s procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outline in the Prevent Duty Policy.

18. Students with family members in prison

Students with a family member in prison will be offered pastoral support as necessary. They will receive a copy of ‘Are you a young person with a family member in prison?’ from Action for Prisoners’ Families where appropriate and allowed the opportunity to discuss questions and concerns.

19. Students required to give evidence in court

Students required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Students will be provided with the booklet 'Going to Court and being a witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

20. Mental health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a student has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – the college will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify students whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how students' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a student that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSL.

The college will access a range of advice to help them identify students in need of additional mental health support, including working with external agencies.

21. Peer-on-peer abuse

For the purposes of this policy, "**peer-on-peer abuse**" is defined as abuse between children.

The college has a zero-tolerance approach to abuse, including peer-on-peer abuse.

All staff will be aware that peer-on-peer abuse can occur between students of any age and gender, both inside and outside of college, as well as online. All staff will be aware of the indicators of peer-on-peer abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that peer-on-peer abuse is not occurring. All staff will speak to the DSL if they have any concerns about peer-on-peer abuse.

All staff will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as "banter" or "part of growing up".

Peer-on-peer abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.

- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

All staff will be clear as to the college's policy and procedures regarding peer-on-peer abuse and the role they have to play in preventing it and responding where they believe a student may be at risk from it.

All staff will be made aware of the heightened vulnerability of students with SEND, who evidence suggests are more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the student's SEND and will always explore indicators further.

All staff will be made aware of the heightened vulnerability of LGBTQ+ students, who evidence suggests are also more likely to be targeted by their peers. In some cases, students who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ students. The college's response to sexual violence and sexual harassment between students of the same sex will be equally as robust as it is for incidents between students of the opposite sex.

Students will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Students will also be reassured that they will be taken seriously, be supported, and kept safe.

The college's procedures for managing allegations of peer-on-peer abuse are outlined in the Peer-on-peer Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the college's Anti-bullying Policy and Exclusion Policy, where relevant.

22. Serious violence

Through training, all staff will be made aware of the indicators which may signal a student is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from college.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a student's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from college.
- Having been permanently excluded from college.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a student may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

23. Online safety and personal electronic devices

The college will adhere to the Online Safety Policy at all times.

As part of a broad and balanced curriculum, all students will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Student attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a student's online activity.

The college will ensure that suitable filtering systems are in place on ICT equipment to prevent children accessing inappropriate material, in accordance with the college's e-Security policy. The college will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what students can be taught online.

Reviewing online safety

The college will carry out an annual review of its approach to online safety, supported by an annual policy that considers and reflects the risks faced by students.

Personal electronic devices

All staff are provided with a college mobile phone which is to be used for communications during the college day and for taking photographs of activities. Photographs will only be taken of students whose parents/carers have given permission.

Where photographs and videos will involve students who are LAC, adopted students, or students for whom there are security concerns, the Acting Head of School will liaise with the DSL to determine the steps involved. The DSL will, in known cases of students who are LAC or who have been adopted, liaise with the students' social workers, carers or adoptive parents to assess the needs and risks associated with the students.

Staff will report any concerns about students' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. “**Operating equipment**” includes enabling, or securing, activation by another person without that person’s knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by the college. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

24. Consensual and non-consensual sharing of indecent images and videos

The college will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual images) as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the student, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the college community, including understanding motivations, assessing risks posed to students depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that students are not unnecessarily criminalised.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible. Where a student confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:

- Refrain from viewing, copy, printing, sharing, storing or saving the imagery.
- Tell the DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the student that the incident will need to be reported.
- Respond positively to the student without blaming or shaming anyone involved, and reassuring them that they can receive support from the DSL.
- Report the incident to the DSL.

The DSL will attempt to understand what the image contains **without viewing it** and the context surrounding its creation and distribution – they will categorise the incident into one of two categories:

- **Aggravated:** incidents which involve additional or abusive elements beyond the creation and distribution of indecent images of students, including where there is an

adult involved, where there is an intent to harm the student depicted, or where the images are used recklessly.

- **Experimental:** incidents involving the creation and distribution of indecent images of students where there is no adult involvement or apparent intent to cause harm or embarrassment to the student.

For there to be a good and clear reason to view imagery, the DSL would need to be satisfied that this action is:

- The only way to make a decision about whether to involve other agencies because it is not possible to establish the facts, e.g. the contents of the imagery, from the student(s) involved.
- Necessary to report it to a website, app or suitable reporting agency to have the image taken down, or to support the student or their parent in making a report.
- Unavoidable because the student has presented the image directly to a staff member or the image has been found on a college device or your college's network.

Where it is necessary to view the imagery, e.g. if this is the only way to make a decision about whether to inform other agencies, the DSL should:

- Never copy, print, share, store or save them as this is illegal – if this has already happened, contact the local police for advice and to explain the circumstances.
- Discuss the decision with the Acting Head of School or a member of the SLT.
- Make sure viewing is undertaken by the DSL (or equivalent) or another member of the safeguarding team with delegated authority from the Acting Head of School or a member of the SLT, on college premises and with another member of staff in the room.
- Make sure, wherever possible, that they are viewed by a staff member of the same sex as the student in the images.
- Record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions.

Where the incident is categorised as 'aggravated', the situation will be managed in line with the college's Peer-on-peer Abuse Policy. Where the incident is categorised as 'experimental', the students involved are supported to understand the implications of sharing indecent imagery and to move forward from the incident. Where there is reason to believe that indecent imagery being circulated will cause harm to a student, the DSL escalates the incident to CSCS. Where indecent imagery of a student has been shared publicly, the DSL will work with the student to report imagery to sites on which it has been shared and will reassure them of the support available.

25. Context of safeguarding incidents

Safeguarding incidents can occur outside of college and can be associated with outside factors. All staff, particularly the DSL and deputy DSL, will always consider the context of safeguarding incidents. Assessment of students' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The college will provide as much contextual information as possible when making referrals to CSCS.

26. Students potentially at greater risk of harm

The college recognises that some groups of students can face additional safeguarding challenges, and understands that further barriers may exist when determining abuse and neglect in these groups of students. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outline below.

Students who need social workers

Students may need social workers due to safeguarding or welfare needs. These needs can leave students vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the relevant LA about whether a student has a social worker in order to make decisions in the best interests of the student's safety, welfare, and educational outcomes.

Where a student needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

Home-educated children

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the Education (Student Registration) (England) Regulations 2006, the college will inform the LA of all deletions from the admissions register when a student is taken off roll.

Where a parent has expressed their intention to remove a student from college for EHE, the college, in collaboration with the relevant LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the student has SEND, is vulnerable, and/or has a social worker.

LAC and PLAC

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The Board of Directors will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the student.

The DSL will be provided with the necessary details of students' social workers and the VSH, and, for PLAC, personal advisers.

Further details of safeguarding procedures for LAC and PLAC are outlined in the college's LAC Policy.

Students with SEND

When managing safeguarding in relation to students with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the student's disability without further exploration; however, it should never be assumed that a student's indicators relate only to their disability
- Students with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for students with SEND, the above factors will always be taken into consideration.

27. Alternative provision

The college will remain responsible for a student's welfare during their time at an alternative provider. When placing a student with an alternative provider, the college will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

28. Work experience

When a student is sent on work experience, the college will ensure that the provider has appropriate safeguarding policies and procedures in place. Where the college has students conduct work experience at the college, an enhanced DBS check will be obtained if the student is over the age of 16.

29. Homestay exchange visits

Privately arranged homestays

Where a parent or student arranges their own homestay, this is a private arrangement and the college is not the regulated activity provider.

Private fostering

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where the college becomes aware of a student being privately fostered, they will notify the relevant LA as soon as possible to allow the LA to conduct any necessary checks.

30. Concerns about students

If a member of staff has any concern about a student's welfare, they will act on them immediately by speaking to the DSL or deputy DSL(s). All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the communication and confidentiality section of this policy.

Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSL with the matter. If a referral is made about a student by anyone other than the DSL, the DSL will be informed as soon as possible.

The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the student. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the student.

If early help is appropriate, the case will be kept under constant review. If the student's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely.

If a student is in immediate danger, a referral will be made to CSCS and/or the police immediately. If a student has committed a crime, such as sexual violence, the police will be notified without delay.

Where there are safeguarding concerns, the college will ensure that the student's wishes are always taken into account, and that there are systems available for students to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the student feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a student and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the student and family require in preventing needs escalating to a point where intervention would be needed.

31. Managing referrals

The reporting and referral process outlined in A will be followed accordingly.

All staff members, in particular the DSL, will be aware of the relevant LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the students

involved. The DSL will work closely with the police to ensure the college does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a student has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The college will not wait for the start or outcome of an investigation before protecting the victim and other students: this applies to criminal investigations as well as those made by CSCS. Where CSCS decide that a statutory investigation is not appropriate, the college will consider referring the incident again if it is believed that the student is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and the college agrees with this decision, the college will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the student will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the student or others at potential risk of harm. The college will work closely with parents to ensure that the student, as well as their family, understands the arrangements in place, such as in-college interventions, is effectively supported, and knows where they can access additional support.

32. Concerns about staff and safeguarding practices

If a staff member has concerns about another member of staff (including supply staff and volunteers), it will be raised with the Acting Head of School. If the concern is with regards to the Acting Head of School, it will be referred to the Executive Headteacher or Chair of the Board of Directors.

Any concerns regarding the safeguarding practices at the college will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

33. Allegations of abuse against staff

All allegations against staff, supply staff, volunteers and contractors will be managed in line with the college's Allegations of Abuse Against Staff Policy – a copy of which will be provided to, and understood by, all staff. The college will ensure all allegations against staff, including those who are not employees of the college, are dealt with appropriately and that the college liaises with the relevant parties.

When managing allegations against staff, the college will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns", as defined in the Allegations of Abuse Against Staff Policy. Allegations that meet the harms threshold include instances where staff have:

- Behaved in a way that has harmed a child, or may have harmed a child.
- Committed or possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

34. Communication and confidentiality

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with college data protection policies.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the college will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the college will do all it can to protect the anonymity of the students involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a student, staff members will not promise the student confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects students from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the students involved. Discussions with parents will not take place where they could potentially put a student at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the college will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a student is leaving the college, the DSL will consider whether it is appropriate to share any information with the student's new provider, in addition to the child protection file, that will allow the new provider to support the student and arrange appropriate support for their arrival.

35. Safer recruitment

The college's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the college at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

The Board of Directors will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will be carried out for all directors, volunteers, and contractors.

Ongoing suitability

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

Referral to the DBS

The college will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

36. Single central record (SCR)

The college keeps an SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the college.

All members of the proprietor body are also recorded on the SCR.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK

- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions

For agency and third-party supply staff, the college will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

The college is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR once they no longer work at the college.

37. Training

Staff members will undergo safeguarding and child protection training at induction, which will be updated on a termly basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy.
- The Peer-on-peer Abuse Policy and procedures.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate).
- The Behavioural Policy.
- The Children Missing Education Policy, including the safeguarding response to children who go missing from education.
- Appropriate child protection and safeguarding training, including online safety training.
- Information about the role and identity of the DSL and deputy DSL.

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep LAC and PLAC safe.
- CCE and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the college.

The DSL and deputy DSL will undergo child protection and safeguarding training, and update this training at least every two years. The DSL and deputy DSL will also obtain access to

resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, students with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by students with SEND.

38. Monitoring and review

This policy is reviewed at least annually by the DSL and the Executive Headteacher. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

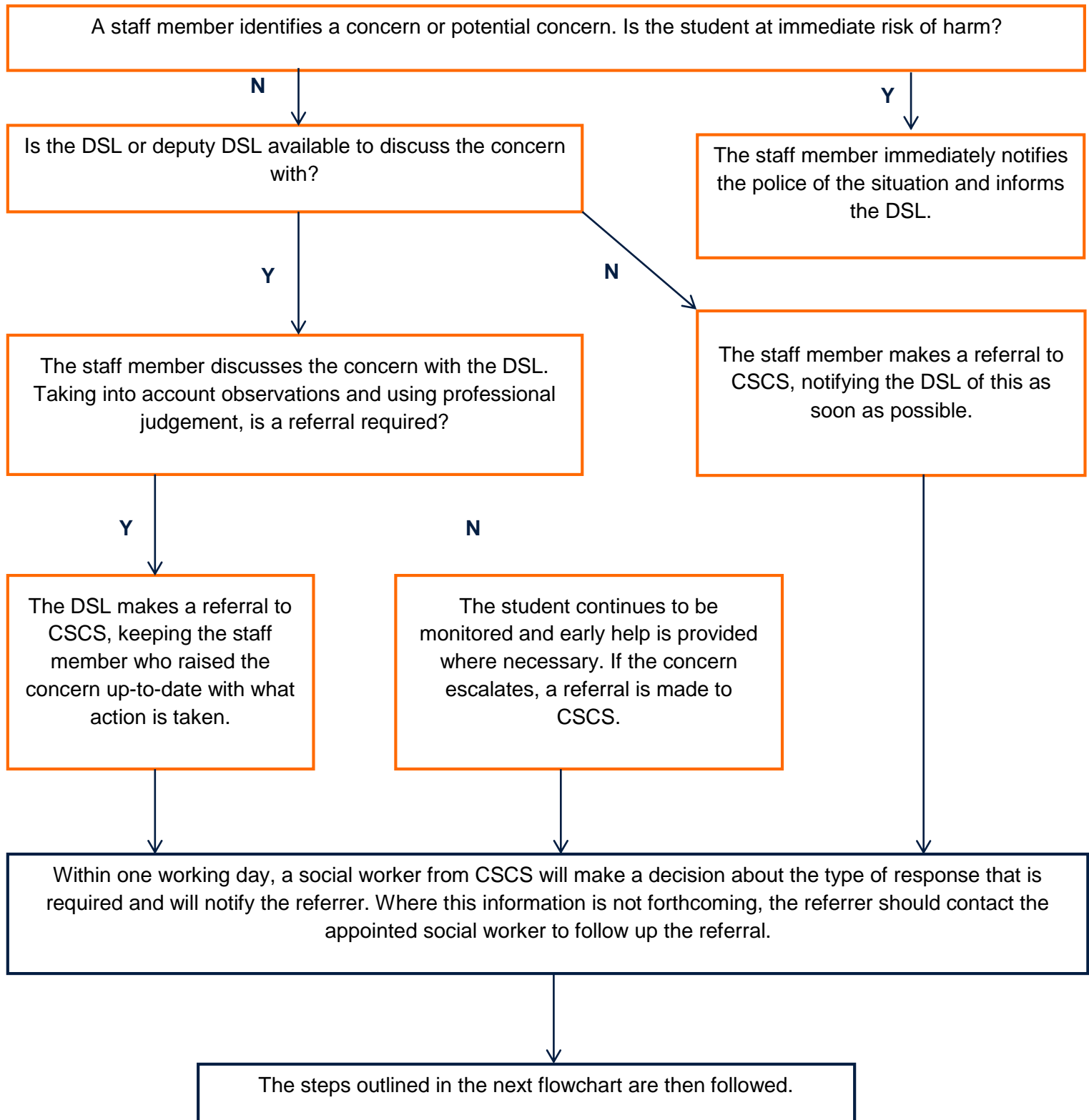
Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy is September 2022.

Annexe A Safeguarding Reporting Process

The process outlined within the first section should be followed where a staff member has a safeguarding concern about a child. Where a referral has been made, the process outlined in the 'After a referral is made' section should be followed.

The actions taken by the college are outlined in yellow, whereas actions taken by another agency are outlined in blue.

Before a referral is made



After a referral is made

Once a referral has been made, a social worker from CSCS will notify the referrer that a decision has been made and one of the following responses will be actioned.

The student is in need of immediate protection.

Where the student is at risk of significant harm but is not in immediate danger, a strategy discussion is held.

No formal assessment is needed.

Where appropriate to do so, the DSL and staff member who raised the concern may be consulted during these stages to ensure that all areas of concern are addressed.

The DSL supports the initial staff member to liaise with other agencies to arrange an early help assessment and appropriate support.

Appropriate emergency action is taken by the social worker, police or NSPCC.

A Child in Need assessment is completed within 45 working days.

Within 15 working days of the strategy discussion, an initial child protection conference is held.

A child protection plan is potentially required.

The type of support needed is identified, arranged through multi-agency liaison and provided effectively.

Staff keep the student's circumstances under review and re-REFER if appropriate to ensure circumstances improve – the student's best interests always come first.

If the child's situation does not appear to be improving, the DSL should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.