

# Safeguarding Policy



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## Important Contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated Safeguarding Lead (DSL)	Tracy French	<a href="mailto:tfrench@thespirescollege.com">tfrench@thespirescollege.com</a> 01803 400660
Safeguarding Team: Designated Person	Charlotte Fisk	<a href="mailto:cfisk@thespirescollege.com">cfisk@thespirescollege.com</a> 01803 400660
Safeguarding Team: Designated Person	Neil Kay	<a href="mailto:nkay@thespirescollege.com">nkay@thespirescollege.com</a> 01803 400660
Safeguarding Team: Designated Person	Nathan Moore	<a href="mailto:nmoore@thespirescollege.com">nmoore@thespirescollege.com</a> 01803 400660
Safeguarding Team: Designated Person	Donna Pearson	<a href="mailto:dpearson@thespirescollege.com">dpearson@thespirescollege.com</a> 01803 400660
Local Authority Designated Officer (LADO)	Ivan Sullivan	<a href="mailto:ivan.sullivan@torbay.gov.uk">ivan.sullivan@torbay.gov.uk</a> 01803 208541
Chair of Governors		c/o <a href="mailto:tfrench@thespirescollege.com">tfrench@thespirescollege.com</a> 01803 400660
Nominated Safeguarding Governor	Helen Prince	c/o <a href="mailto:tfrench@thespirescollege.com">tfrench@thespirescollege.com</a> 01803 400660
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# 1. Policy Statement and Principles

We recognise our moral and statutory responsibilities to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

Our principles:

- ▲ The welfare of the child is paramount;
- ▲ All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection;
- ▲ All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm;
- ▲ Students and staff involved in child protection issues will receive appropriate support.

We aim to ensure that:

- ▲ Appropriate action is taken in a timely manner to safeguard and promote children's welfare;
- ▲ All staff are aware of their statutory responsibilities with respect to safeguarding;
- ▲ Staff are properly training in recognising and reporting safeguarding issues.

This policy applies to all staff (all those working for or on behalf of the college, full time or part time, temporary or permanent, in either a paid or voluntary capacity) and all governors.

# 2. Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2020\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners:

- ▲ Torbay Council
- ▲ NHS Devon Clinical Commissioning Group
- ▲ Devon and Cornwall Police

This policy is also based on the following legislation:

- ▲ Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of students
- ▲ [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- ▲ [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- ▲ Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police

where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

- ▲ [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- ▲ [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- ▲ Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- ▲ [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

### 3. Definitions

**Safeguarding and promoting the welfare of children** means:

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

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

**Sexting** (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children

**Children** includes everyone under the age of 18.

The following three **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by Chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- ▲ Torbay Council
- ▲ NHS Devon Clinical Commissioning Group
- ▲ Devon and Cornwall Police

## 4. Equality Statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- ▲ Have special educational needs or disabilities (see Section 9)
- ▲ Are young carers
- ▲ May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- ▲ Have English as an additional language
- ▲ Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- ▲ Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- ▲ Are asylum seekers
- ▲ Are at risk due to either their own or a family member's mental health needs
- ▲ Are looked after or previously looked after (see Section 11).

## 5. Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the College and is consistent with the procedures of the three safeguarding partners.

Our policy and procedures also apply to extended College and off-site activities.

### 5.1 All Staff

All staff will read and understand Part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

- ▲ Our systems which support safeguarding, including:
  - ▲ This Safeguarding Policy
  - ▲ The Staff Code of Conduct
  - ▲ The role and identities of the designated safeguarding lead (DSL) and the safeguarding team
  - ▲ The College's Behaviour Policy
  - ▲ The safeguarding response to children who go missing from education

- ▲ The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- ▲ The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- ▲ What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- ▲ The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation

Section 15 and Appendix 4 of this policy outline in more detail how staff are supported to do this.

## 5.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Tracy French. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during College hours for staff to discuss any safeguarding concerns.

When the DSL is absent, the safeguarding team designated persons will act as cover. The safeguarding team is:

- ▲ Charlotte Fisk
- ▲ Neil Kay
- ▲ Nathan Moore
- ▲ Donna Pearson

The DSL will be given the time, funding, training, resources and support to:

- ▲ Provide advice and support to other staff on child welfare 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 children;
- ▲ Refer suspected cases, as appropriate, to the relevant body, MASH, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.

The DSL will also keep the Principal informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL are set out in their job description.

## 5.3 The Governing Body

The governing body will approve this policy at each review, ensure it complies with the law and hold the Principal to account for its implementation.

The governing body will appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing body. This is always a different person from the DSL.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Principal, where appropriate (see Appendix 3).

All governors will read Keeping Children Safe in Education.

Section 15 has information on how governors are supported to fulfil their role.

## 5.4 The Principal

The Principal is responsible for the implementation of this policy, including:

- ▲ Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- ▲ Communicating this policy to parents when their child joins the College and via the College website
- ▲ Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- ▲ Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- ▲ Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 3)

## 6. Confidentiality

The College's approach to confidentiality and data protection is described in the Data Protection Policy and Privacy Notices.

In addition, all staff understand that child protection issues warrant a high level of confidentiality, not only out of respect for the student and staff involved, but also to ensure that information being released into the public domain does not compromise evidence.

With regard to safeguarding, the College also recognises that:

- ▲ Timely information sharing is essential to effective safeguarding
- ▲ Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- ▲ The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- ▲ If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- ▲ Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- ▲ The government's [information sharing advice for safeguarding practitioners](#) includes seven 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

- ▲ If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy) or the data protection officer.

Within the College, in order to maintain clarity, wherever possible, the DSL or case manager will share information by arranging a meeting for all relevant colleagues. The sharing of information with college staff, safeguarding partners and other agencies will be done within the following principles. Information must be:

- ▲ necessary and proportionate
- ▲ relevant
- ▲ adequate
- ▲ accurate
- ▲ timely
- ▲ secure

Confidentiality is also addressed in this Policy with respect to record-keeping in Section 14, and allegations of abuse against staff in Appendix 3.

## 7. Recognising Abuse and Taking Action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

**Please note that in this and subsequent sections, any references to the DSL means “the DSL (or Safeguarding Team)”.**

### 7.1 If a child is suffering or likely to suffer harm, or in immediate danger

If you believe that a child is suffering or likely to suffer harm, or is in immediate danger, tell the DSL without delay. The DSL will make an enquiry to the Multi Agency Safeguarding Hub (MASH) in accordance with the TSCB Torbay Assessment Framework for Safeguarding Children, Young People and their Families. The student (subject to their age and understanding) and the parents will be told that an enquiry is being made, unless to do so would increase the risk to the child.

If the DSL or any member of the safeguarding team is unavailable, make a referral to the MASH and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.** Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

The procedure for making a referral in this situation is:

- ▲ If the child is believed to be in significant immediate harm, contact MASH by telephone and/or in writing if via MASH referral form
- ▲ If the referral is being made by someone other than the DSL, the referrer must tell the DSL about the referral and provide a copy of any referral form
- ▲ A response from the MASH team with recommendations and confirmation that the case has been allocated is expected immediately, or by the end of the next working day
- ▲ In some cases, a strategy meeting is held, in which multi agencies consider the referral and decide any actions and outcomes of the referral

The referral form and other contact details are available on the [MASH website](#). More information can be found on the [government website](#).

## 7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- ▲ Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- ▲ Stay calm and do not show that you are shocked or upset
- ▲ Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- ▲ Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- ▲ Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- ▲ Sign and date the write-up and pass it on to the DSL

Alternatively, if appropriate, make a referral to the MASH and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so

## 7.3 If you discover that FGM has taken place or a student is at risk of FGM

The Department for Education's *Keeping Children Safe in Education* explains that FGM comprises "all procedures involving 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. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in Appendix 4.

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **student under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have specifically been told not to disclose, they should also discuss the case with the DSL and involve children's social care, via the MASH team, as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **student under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

**Any member of staff** who suspects a student is *at risk* of FGM or suspects that FGM has been carried out or discovers that a student **age 18 or over** appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures.

The procedure in cases of known or suspected FGM is:

- ▲ Where there is a risk to life or likelihood of serious immediate harm, the case should be reported to the police immediately, including dialling 999 if appropriate. The DSL must be made aware as soon as possible.
- ▲ **Teachers** and the **DSL** must report directly to the police following the procedure below:
  - ▲ Contact the police using the 101 service by telephone or [online](#)
  - ▲ Obtain a reference number from the police and share this, along with a report of the case so far with information with the [MASH team](#) immediately
  - ▲ Guidance will be taken from the MASH team and the police.
  - ▲ Teachers who have made a direct report must keep a detailed report of the case including action they have taken, times and dates and reference numbers and provide this to the DSL
- ▲ **Non-teaching staff** must report the details to the DSL who will follow the procedure above

More information can be found on the [government website](#).

## 7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

If staff are unclear whether their observations present a risk then they must consult the DSL. The DSL will log the concerns. If a pattern becomes clear this will be discussed with Torbay Education Safeguarding Service.

Where possible, speak to the DSL first to agree a course of action.

If, in exceptional circumstances, the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0800 800 5000. Share any action taken with the DSL as soon as possible.

You can make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

### Early help

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the College will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Local procedures, including intervention levels are detailed in the [TSCB Interactive Threshold Toolkit](#).

When a family is identified as requiring Level 2 intervention:

- ▲ The DSL will complete an early help referral with the family
- ▲ The DSL will coordinate a multi-agency TAF (Team Around the Family) meeting to establish the needs of the family

- ▲ Action identified as being required will be taken

At any point the case could be escalated by the DSL or Lead Professional to require Level 3 intervention or above. Cases can also be de-escalated.

## Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see Section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision usually within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

The DSL will follow the Escalation Policy on the TSCB's website. All procedures are set out within this [Policy](#).

## 7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care, via the MASH team. You can make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which College staff and governors can call to raise concerns about extremism with respect to a student. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- ▲ Think someone is in immediate danger
- ▲ Think someone may be planning to travel to join an extremist group
- ▲ See or hear something that may be terrorist-related

## 7.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the appropriate pastoral team to agree a course of action.

## 7.7 Concerns about a staff member or volunteer

If you have concerns about a member of staff (including a supply teacher or volunteer) or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the Principal. If the concerns/allegations are about the Principal, speak to the chair of governors.

The Principal/chair of governors will then follow the procedures set out in Appendix 3, if appropriate.

## 7.8 Allegations of abuse made against other students

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Most cases of students hurting other students will be dealt with under our College's Behaviour Policy, but this Safeguarding Policy will apply to any allegations that raise safeguarding concerns.

This might include where the alleged behaviour:

- ▲ Is serious, and potentially a criminal offence
- ▲ Could put students in the College at risk
- ▲ Is violent
- ▲ Involves students being forced to use drugs or alcohol
- ▲ Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting).

If a student makes an allegation of abuse against another student:

- ▲ You must record the allegation and tell the DSL, but do not investigate it
- ▲ The DSL will contact the Multi-Agency Safeguarding Hub and follow its advice, as well as the police if the allegation involves a potential criminal offence
- ▲ The DSL will put a risk assessment and support/safety plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- ▲ The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

We will minimise the risk of peer-on-peer abuse by:

- ▲ Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images

- ▲ Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- ▲ Ensuring our curriculum helps to educate students about appropriate behaviour and consent
- ▲ Ensuring students know they can talk to staff confidentially. Several displays around the College give this information, including photographs of the safeguarding and pastoral teams.
- ▲ Ensuring staff are trained to understand that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

## 7.8 Sexting

### Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

- ▲ View, download or share the imagery yourself, or ask a student to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- ▲ Delete the imagery or ask the student to delete it
- ▲ Ask the student(s) who is involved in the incident or to disclose information regarding the imagery (this is the DSL's responsibility)
- ▲ Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- ▲ Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the student(s) that they will receive support and help from the DSL.

### Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate College staff. This meeting will consider the initial evidence and aim to determine:

- ▲ Whether there is an immediate risk to student(s)
- ▲ If a referral needs to be made to the police and/or children's social care, via the MASH.
- ▲ If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- ▲ What further information is required to decide on the best response
- ▲ Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- ▲ Whether immediate action should be taken to delete or remove images from devices or online services
- ▲ Any relevant facts about the students involved which would influence risk assessment
- ▲ If there is a need to contact another school, college, setting or individual

- ▲ Whether to contact parents or carers of the students involved (in most cases parents should be involved)

The DSL will make an immediate referral to police and/or children's social care, via the MASH, if:

- ▲ The incident involves an adult
- ▲ There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- ▲ What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- ▲ The imagery involves sexual acts and any child in the imagery is under 13
- ▲ The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Principal and other members of staff, as appropriate, may decide to respond to the incident without involving the police or children's social care.

### **Further review by the DSL**

If, at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

They will hold conversations with the students involved (if appropriate) to establish the facts and assess the risks.

If, at any point in the process, there is a concern that a student has been harmed or is at risk of harm, a referral will be made to the Multi Agency Safeguarding Hub.

### **Informing parents**

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through the non-emergency police 101 reporting service, either by telephone, [online](#) or by email.

### **Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in Section 12 of this policy also apply to recording incidents of sexting.

### **Curriculum coverage**

Students are taught about the issues surrounding sexting as part of our Personal Development curriculum. Teaching covers the following in relation to sexting:

- ▲ What it is
- ▲ How it is most likely to be encountered

- ▲ The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- ▲ Issues of legality
- ▲ The risk of damage to people's feelings and reputation.

Students also learn the strategies and skills needed to manage:

- ▲ Specific requests or pressure to provide (or forward) such images
- ▲ The receipt of such images.

## 8. Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the TESS before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

## 9. Students with special educational needs and disabilities

We recognise that students with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- ▲ Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- ▲ Students being more prone to peer group isolation than other students
- ▲ The potential for students with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- ▲ Communication barriers and difficulties in overcoming these barriers

## 10. Pupils with a social worker

Students may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the child's safety, welfare and educational outcomes. For example, it will inform decisions about:

- ▲ Responding to unauthorised absence or missing education where there are known safeguarding risks

- ▲ The provision of pastoral and/or academic support

## 11. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- ▲ Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- ▲ The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Caroline Kolek, SENDCo, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- ▲ Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- ▲ Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

## 12. Mobile Phones and Cameras

Staff are allowed to bring their personal phones to College for their own use, but will limit such use to non-contact time when students are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with students.

Staff will not take pictures or recordings of students on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the College.

The College's approach to taking, storing and using photographs and videos of students is described in the Photography and Video Consent, Storage and Use Policy.

## 13. Complaints and Concerns about College Safeguarding Policies

### 13.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Appendix 3).

### 13.2 Other complaints

Complaints are dealt with in accordance with the College's Complaints Policy.

### 13.3 Whistle-blowing

Concerns regarding the way the College safeguards students – including poor or unsafe practice, or potential failures – should be raised through the College's Whistle-blowing Policy.

## 14. Record-keeping

We will hold records in line with our records retention schedule (see Data Protection Policy).

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the College.

If a child for whom the College has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main student file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

- ▲ Records may be kept either electronically, in hard copy, or both.
- ▲ Hard copies of records will be kept in locked cabinets in the DSL's office, which is locked when unoccupied. Electronic records will be stored on the CPOMS system.
- ▲ The DSL's office is accessible only via an exclusive key. CPOMS is a password protected system accessible only to key staff and with additional levels of security regarding access to entries provided through a randomly generated code.
- ▲ Electronic communication is encrypted via Egress Switch and the transfer of hard copy files is made via Royal Mail tracked mail. Sensitive information will not routinely be stored on laptop computers.
- ▲ Child protection information will be stored separately from the student's College file and the College file will be 'tagged' to indicate that separate Safeguarding or Child Protection information is held.

- ▲ The DSL will use a College issued, password protected tablet to access CPOMS when offsite, e.g. at multi agency meetings.
- ▲ Information is shared with the MASH team by telephone or using their referral form. At any point in a case, other agencies may become involved and multi-agency meetings take place to include information sharing. The DSL, DDSL or Safeguarding team members will liaise with other agencies on a case by case basis following the information sharing principles detailed in Section 6.
- ▲ We retain the information until the child reaches 25 years of age, which is 7 years after they have left school [as per the NSPCC Guidelines].

In addition:

- ▲ Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- ▲ Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

## 15. Training

### 15.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the College's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the three safeguarding partners.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Contractors who are provided through the College's private finance initiative (PFI) or similar contract will also receive safeguarding training. All staff employed to work at the college by the PFI provider will complete online training provided by the PFI provider upon commencement of employment. Level 2 training is provided by the DSL to the PFI onsite management, caretaking, and catering staff every two years. This is cascaded to cleaning staff by PFI management.

Volunteers will receive appropriate training, if applicable.

### 15.2 The DSL, Deputy DSL and Safeguarding Team

The DSL, Deputy DSL and Safeguarding Team will undertake child protection and safeguarding training at least every two years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

## 15.3 Governors

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Principal, they receive training in managing allegations for this purpose.

## 15.4 Recruitment – interview panels

At least one person conducting any interview for a post at the College will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

## 16. Monitoring Arrangements

This policy will be reviewed **annually**. At every review, it will be approved by the full governing board.

## 17. Links with Other Policies

This policy links to the following policies and procedures:

- ▲ Student Behaviour Policy
- ▲ Anti-Bullying Policy
- ▲ Staff Code of Conduct
- ▲ Staff Disciplinary Policy
- ▲ Whistle-Blowing Policy
- ▲ Complaints Policy
- ▲ Student Attendance Policy
- ▲ Online Safety Policy
- ▲ Equality and Diversity Policy Statement
- ▲ Sex and Relationship Education Policy
- ▲ Supporting Students with Medical Conditions Policy
- ▲ Data Protection and Privacy notices
- ▲ Photography and Video Consent, Use and Storage Policy
- ▲ Electronic Communications and Social Media Policy
- ▲ ICT Acceptable Use Policies
- ▲ SEND Policy
- ▲ Tackling Extremism and Radicalisation Policy
- ▲ Designated Teacher Policy

## Appendices

These appendices are based on the Department for Education's statutory guidance, **Keeping Children Safe in Education 2019**.

## Appendix 1: Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- ▲ Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- ▲ Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- ▲ Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- ▲ Seeing or hearing the ill-treatment of another
- ▲ Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

- ▲ **Physical contact**, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- ▲ **Non-contact activities**, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

Once a child is born, neglect may involve a parent or carer failing to:

- ▲ Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- ▲ Protect a child from physical and emotional harm or danger
- ▲ Ensure adequate supervision (including the use of inadequate care-givers)

- ▲ Ensure access to appropriate medical care or treatment
- ▲ It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## Appendix 2: Safer Recruitment and DBS Checks: policy and procedures

We will record all information on the checks carried out in the College's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

### New staff

When appointing new staff, we will:

- ▲ Verify their identity
- ▲ Obtain an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- ▲ Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- ▲ Verify their mental and physical fitness to carry out their work responsibilities
- ▲ Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- ▲ Verify their professional qualifications, as appropriate
- ▲ Ensure they are not subject to a prohibition order if they are employed to be a teacher
- ▲ Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

**Regulated activity** means a person who will be:

- ▲ Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- ▲ Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- ▲ Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- ▲ We believe the individual has engaged in [relevant conduct](#); or
- ▲ The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- ▲ The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- ▲ The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the College has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- ▲ An enhanced DBS check with barred list information for contractors engaging in regulated activity
- ▲ An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- ▲ We will obtain the DBS check for self-employed contractors.
- ▲ We will not keep copies of such checks for longer than 6 months.
- ▲ Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- ▲ We will check the identity of all contractors and their staff on arrival at the College.

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

### **Volunteers**

We will:

- ▲ Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- ▲ Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

- ▲ Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

## **Governors**

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

All governors will also have the following checks:

- ▲ Identity
- ▲ Right to work in the UK
- ▲ Other checks deemed necessary if they have lived or worked outside the UK

## **Staff working in alternative provision settings**

Where we place a student with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

## **Adults who supervise students on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a student under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

## **Students staying with host families**

Where the College makes arrangements for students to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the College is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Some students may reside with local host families and as such are considered to be privately fostered. The College will support Torbay Council's Private Fostering team in executing their duty to ensure that such arrangements are safe and suitable. The Admissions Officer will provide details of students to be admitted who will be staying with local host families and the College will allow time and space within College for Private Fostering team members to meet with privately fostered students, as required by their policies and procedures.

More information about Private Fostering is available on Torbay Council's [website](#).

## Appendix 3: Allegations of Abuse Made Against Staff

This section of this policy applies to all cases in which it is alleged that a current member of staff, including a supply teacher or volunteer, has:

- ▲ Behaved in a way that has harmed a child, or may have harmed a child, or
- ▲ Possibly committed a criminal offence against or related to a child, or
- ▲ Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children, or
- ▲ Behaved or may have behaved in a way that indicates he or she may not be suitable to work with children

It applies regardless of whether the alleged abuse took place in the College. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

### Suspension of the accused until the case is resolved

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- ▲ Redeployment within the College so that the individual does not have direct contact with the child or children concerned
- ▲ Providing an assistant to be present when the individual has contact with children
- ▲ Redeploying the individual to alternative work in the College so that they do not have unsupervised access to children
- ▲ Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted

### Definitions for outcomes of allegation investigations

- ▲ **Substantiated:** there is sufficient evidence to prove the allegation
- ▲ **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- ▲ **False:** there is sufficient evidence to disprove the allegation
- ▲ **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- ▲ **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

## Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Principal (or chair of governors where the Principal is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- ▲ Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and to agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- ▲ Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- ▲ Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the College is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- ▲ **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the College and their contact details
- ▲ **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- ▲ **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- ▲ Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- ▲ Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who

wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- ▲ Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- ▲ Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- ▲ If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- ▲ Where the police are involved, wherever possible the governing body will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the College's disciplinary process, should this be required at a later point.

### **Additional considerations for supply staff**

If there are concerns or an allegation is made against someone not directly employed by the College, such as supply staff provided by an agency, we will take the actions below in addition to our standard procedures.

- ▲ We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome
- ▲ The Principal will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, while the College carries out the investigation
- ▲ We will involve the agency fully, but the College will take the lead in collecting the necessary information and providing it to the local authority designated officer as required
- ▲ We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

### **Timescales**

- ▲ Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within one week
- ▲ If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within three working days
- ▲ If a disciplinary hearing is required, timescales will be as set out in the College's Disciplinary Procedure

## Specific actions

### Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

### Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the College ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the College's HR adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

If the individual concerned is a member of teaching staff, the case manager and HR adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the College.

### Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Principal, or other appropriate person in the case of an allegation against the Principal, will consider whether any disciplinary action is appropriate against the student(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a student.

## Confidentiality

The College will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- ▲ Who needs to know about the allegation and what information can be shared
- ▲ How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- ▲ What, if any, information can be reasonably given to the wider community to reduce speculation
- ▲ How to manage press interest if, and when, it arises

## Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- ▲ A clear and comprehensive summary of the allegation
- ▲ Details of how the allegation was followed up and resolved
- ▲ Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the College will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

## References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

## Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- ▲ Issues arising from the decision to suspend the member of staff
- ▲ The duration of the suspension
- ▲ Whether or not the suspension was justified
- ▲ The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

## Appendix 4: Specific Safeguarding Issues

This appendix is based on the advice in **Annex A** of **Keeping Children Safe in Education 2020**.

### Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- ▲ Are at risk of harm or neglect
- ▲ Are at risk of forced marriage or FGM
- ▲ Come from Gypsy, Roma, or Traveller families
- ▲ Come from the families of service personnel
- ▲ Go missing or run away from home or care
- ▲ Are supervised by the youth justice system
- ▲ Cease to attend a school
- ▲ Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the College without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care, via the MASH team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

### Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- ▲ Appearing with unexplained gifts or new possessions
- ▲ Associating with other young people involved in exploitation
- ▲ Suffering from changes in emotional wellbeing
- ▲ Misusing drugs and alcohol
- ▲ Going missing for periods of time or regularly coming home late
- ▲ Regularly missing school or education
- ▲ Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### County lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

All staff will be made aware of that key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

All staff will also be made aware that, like other forms of abuse and exploitation, county lines exploitation:

- ▲ Can affect any child or young person (male or female) under the age of 18 years;
- ▲ Can affect any vulnerable adult over the age of 18 years;
- ▲ Can still be exploitation even if the activity appears consensual;
- ▲ Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- ▲ Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- ▲ Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

### Child sexual exploitation

Child sexual exploitation (CSE) is a form of 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 and/or for the financial advantage or

increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- ▲ Having an older boyfriend or girlfriend
- ▲ Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team, via the MASH, and the police, if appropriate. Whilst it is preferable that the DSL oversees the process from the start, anyone can make a referral and ask for advice. If a child is considered to be in immediate danger, the police should be contacted including by dialling 999, if appropriate.

The local procedures and more information are available on the MASH [website](#).

## **Domestic abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

The DSL will provide support according to the child's needs and update records about their circumstances.

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL, Deputy DSL and Safeguarding Team will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care, via the MASH team.

### **So-called 'honour-based' abuse (including FGM and forced marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

### **FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

- ▲ A student confiding in a professional that FGM has taken place
- ▲ A mother/family member disclosing that FGM has been carried out
- ▲ A family/student already being known to social services in relation to other safeguarding issues
- ▲ A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

Potential signs that a student may be at risk of FGM include:

- ▲ The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- ▲ FGM being known to be practised in the girl's community or country of origin
- ▲ A parent or family member expressing concern that FGM may be carried out

- ▲ A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- ▲ A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

### **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘one chance’ rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- ▲ Speak to the student about the concerns in a secure and private place
- ▲ Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- ▲ Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmufco.gov.uk](mailto:fmufco.gov.uk)
- ▲ Refer the student to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

## Preventing radicalisation

- ▲ **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies.
- ▲ **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- ▲ **Terrorism** is an action that:
  - Endangers or causes serious violence to a person/people
  - Causes serious damage to property, or
  - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our College being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our students to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in students' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a student is being radicalised can include:

- ▲ Refusal to engage with, or becoming abusive to, peers who are different from themselves
- ▲ Becoming susceptible to conspiracy theories and feelings of persecution
- ▲ Changes in friendship groups and appearance
- ▲ Rejecting activities they used to enjoy
- ▲ Converting to a new religion
- ▲ Isolating themselves from family and friends
- ▲ Talking as if from a scripted speech
- ▲ An unwillingness or inability to discuss their views
- ▲ A sudden disrespectful attitude towards others
- ▲ Increased levels of anger
- ▲ Increased secretiveness, especially around internet use
- ▲ Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- ▲ Accessing extremist material online, including on Facebook or Twitter

- ▲ Possessing extremist literature
- ▲ Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour: staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including the Tackling Extremism and Radicalisation Policy.

### Serious violence

All staff will be made aware of indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include:

- ▲ increased absence from school
- ▲ a change in friendships or relationships with older individuals or groups
- ▲ a significant decline in performance
- ▲ signs of self-harm or a significant change in wellbeing, or
- ▲ signs of assault or unexplained injuries.

Staff will also be made aware that unexplained gifts or new possessions could indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff will be made aware of the associated risks and understand the measures in place to manage these.

Advice for schools and colleges is provided in the [Home Office's Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).

### Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and Ofsted inspectors, will be asked to show photo ID and:

- ▲ Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- ▲ The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise students or staff.

### **Missing students**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing:

- ▲ The DSL will be informed of the situation as soon as possible
- ▲ College staff (usually the relevant Pastoral Support Manager supported by other staff and the DSL) will liaise closely with parents, including to identify possible locations of the child
- ▲ Usually, but on a case by case basis, at least 30 minutes will be allowed to explore possible locations of the child, and every possible avenue to locate the child will be exhausted
- ▲ The parents, DSL, or a member of the Safeguarding Team will inform the police that the child is missing and the action already taken, usually via the 101 reporting service, unless it is deemed an emergency or the child is already identified as being vulnerable, in which case a 999 call will be made
- ▲ The DSL and/or a member of the Safeguarding Team and/or the pastoral team will work with the police and family once the child is located
- ▲ If the child has gone missing from home, Checkpoint will receive a missing persons report from the police and the College will work with Checkpoint to improve the safety of the child

### **Children who are involved in the court system or who have family members in prison**

The College will liaise and work with the MASH team and other agencies regarding students who are involved in the court system or who have family members in prison. The pastoral team will work with families on a case by case basis regarding appropriate arrangements for prison visits and offer additional support, including counselling.

The DSL will undertake relevant training via DSL forums and be aware of how to present in court.

The DSL will liaise with college staff, Children's Services and other agencies on a case by case basis, following the information sharing principles detailed in Section 6.

[Partnership Arrangements](#) can be found on the TSCB website.

## History of Changes

### August 2020

POLICY SECTION	AMENDMENT	REASON
Important Contacts	Removed Sasha Agnew (DDSL) and Duncan Smillie (Safeguarding Team)	<b>Workforce changes</b>

### September 2020

POLICY SECTION	AMENDMENT	REASON
Section 3	Clarified that both mental and physical health are relevant to safeguarding	To reflect a change of wording in paragraph 4 of KCSIE
Section 4	Added reference to see section 11 in the last bullet point of the equality statement (on looked-after and previously looked-after children)	To provide extra signposting to section 11, which is a new section about looked-after and previously looked-after children
Section 7.3	Change in wording to say that teachers who discover that female genital mutilation appears to have been carried out on a pupil under 18 should discuss the case with the DSL <i>unless they've been specifically told not to disclose</i> , rather than <i>unless they have good reason not to disclose</i>	To make this wording more specific in order to encourage teachers to not withhold information
Section 7.4	Added a sentence to say staff should share details of any actions they've taken with the DSL as soon as possible if they have concerns about a child	To make it clear that any action taken should be shared with the DSL as soon as possible
Section 7.5	Added a sentence to say staff should inform the DSL as soon as possible if they make a referral to local authority children's social care about any extremism concerns	To make it clear that the DSL should be informed as soon as possible
Section 7.6	New section on what staff should do if they have a mental health concern that is also a safeguarding concern	To reflect new paragraphs 34 to 38 in KCSIE
Section 7.7	Added wording to make it explicitly clear that this section also applies to supply staff	To reflect a change of wording in paragraph 56 of KCSIE
Section 7.8	Deleted the example of the gendered nature of peer-on-peer abuse – <i>i.e. that it is more likely that</i>	Legal experts (Forbes Solicitors) advised against using specific examples in the policy, despite it

	<i>girls will be victims and boys perpetrators</i>	being in KCSIE, to limit any discrimination risk
Section 10	New section to reflect needs of pupils with a social worker	To reflect new paragraphs 109 to 112 in KCSIE
Section 11	New section to reflect needs of looked-after and previously looked-after children	To add some information on looked-after and previously looked-after children. (There has been no change in requirements on this between the 2019 and 2020 versions of KCSIE)
Section 17	Added designated teacher policy to the list of policies	This has become a required policy
Appendix 3	Added a 4th bullet point to the list of circumstances in which we need to follow procedures for managing allegations	To reflect a new bullet point in paragraph 211 of KCSIE
Appendix 3	Added wording to make it explicitly clear that this section also applies to supply staff	To reflect a change of wording in paragraph 56 of KCSIE
Appendix 3	Changed heading from 'Suspension' to 'Suspension of the accused until the case is resolved'	To add extra clarity about when suspension will happen until
Appendix 3	Added a new sub-section within 'Procedure for dealing with allegations', covering additional considerations for supply staff	To reflect new paragraphs 214 to 217 in KCSIE
Appendix 3	Added a sentence to say that a referral will be made to the DBS if an allegation is substantiated and it is thought that the individual has or may have engaged in conduct that has harmed or is likely to harm a child, or that they might pose a risk of harm to a child	It is a legal requirement for employers to make a referral to the DBS in this case
Appendix 4	Added section on child criminal exploitation	To reflect additional information in Annex A of KCSIE
Appendix 4	Added more information on child sexual exploitation	To reflect additional information in Annex A of KCSIE
Appendix 4	Added section on domestic abuse	To reflect clarification in Annex A of KCSIE
Appendix 4	Changed wording from 'honour-based violence' to 'honour-based abuse'	To reflect wording change in Annex A of KCSIE
Appendix 4	Updated definitions in 'Preventing radicalisation' section	To reflect new wording in Annex A of KCSIE

