

Safeguarding Policy



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Important Contacts

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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 \(2021\)](#) 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.

Sharing of nudes and semi-nudes (also known as sexting or 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 or health conditions (see Section 10)
- ▲ 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 12)
- ▲ Are missing from education
- ▲ Whose parent/carer has expressed an intention to remove them from school to be home educated

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 B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

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), the deputy designated safeguarding lead and the safeguarding team
 - The College's Behaviour Policy
 - The College's Online Safety 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), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- ▲ The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

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:

- ▲ Theresa Bennett (DDSL)
- ▲ Charlotte Fisk
- ▲ Neil Kay
- ▲ 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 and DDSL are set out in their job descriptions.

5.3 The Governing Body

The governing body will:

- ▲ Facilitate a whole-college approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- ▲ Evaluate and approve this policy at each review, ensuring it complies with the law and hold the Principal to account for its implementation.
- ▲ 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 in its entirety.

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 volunteer:
 - Are informed of our systems which support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- ▲ 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 updating the content of this training 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 relevant colleagues. The sharing of information with college staff, safeguarding partners and other agencies will be undertaken in line with the principle that any information shared 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 deputy DSL or the 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 children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

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 either:

- ▲ Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- ▲ Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. The procedure for reporting is as follows:

- ▲ 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. (Unless they have specifically been told not to disclose)
- ▲ 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. (Unless they have specifically been told not to disclose)

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.

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 0808 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. 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, volunteer or contractor) or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Principal as soon as possible. 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.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Principal, report it directly to the local authority designated officer (LADO).

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”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

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 the sharing of nudes and semi-nudes).

See Appendix 4 for more information about peer-on-peer abuse.

Procedures for dealing with allegations of peer-on-peer abuse

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
- ▲ Any in-College investigation will follow MASH advice
- ▲ 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
- ▲ The DSL maintains a log of such allegations to ensure College leaders have an accurate understanding of any area of concern

Creating a supportive environment in college and minimising the risk of peer-on-peer abuse

We recognise the importance of taking proactive action to minimise the risk of peer-on-peer abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- ▲ Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- ▲ Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- ▲ Ensure our curriculum helps to educate students about appropriate behaviour and consent
- ▲ Ensure students are able to easily and confidently report abuse using our reporting systems (as described in Section 7.10 below)
- ▲ Ensure staff reassure victims that they are being taken seriously
- ▲ Ensure staff are trained to understand:
 - How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
 - That even if there are no reports of peer-on-peer abuse in the College, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child's behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - 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
 - The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns

7.9 Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- ▲ View, copy, print, share, store or save 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 are involved in the incident 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/carers

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 incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in Section 14 of this policy also apply to recording these incidents.

Curriculum coverage

Students are taught about the issues surrounding the sharing of nudes and semi-nudes 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

7.10 Reporting systems for our students

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- ▲ Put systems in place for pupils to confidently report abuse
- ▲ Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- ▲ Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback

The College has a large Safeguarding and Pastoral team and students can report concerns to any of them. This includes tutors, Pastoral Support Managers, Heads of Year, SLT and the Inclusion team, as well as the DSL and DDSL. This is facilitated by:

- ▲ Pastoral staff being readily available at unstructured times so that students may approach them. Regular reminders being given in assemblies of this
- ▲ A Safeguarding assembly early each year by the DSL to explain reporting and her accessibility
- ▲ Display boards at the entrance and around the College showing who students can talk to, including photographs
- ▲ Regular reminders in Personal Development and RSE lessons about how to report concerns and of the reception and support they will receive if doing so

- ▲ Any student submitting any concerns being given reassurances provided following disclosures so they feel safe and listened to.

8. Online Safety and the Use of Mobile Technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our College aims to:

- ▲ Have robust processes in place to ensure the online safety of students, staff, volunteers and governors
- ▲ Protect and educate the whole College community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- ▲ Set clear guidelines for the use of mobile phones for the whole College community
- ▲ Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The four key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- ▲ **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- ▲ **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- ▲ **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. *consensual and non-consensual sharing of nudes and semi-nudes and/or pornography*), sharing other explicit images and online bullying; and
- ▲ **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

- ▲ Educate students about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- ▲ Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- ▲ Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- ▲ Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - 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 will not take pictures or recordings of students on their personal phones or cameras
- ▲ Make all students, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in college, use of the College's ICT systems and use of their mobile and smart technology
- ▲ Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones
- ▲ Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- ▲ Put in place robust filtering and monitoring systems to limit children's exposure to the four key categories of risk (described above) from the College's IT systems
- ▲ Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our College community

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our College's policy on online safety and the use of mobile phones, please refer to our Online Safety Policy, Student Behaviour Policy, Staff Code of Conduct, ICT Acceptable Use Policies and Photography and Video Consent, Use and Storage Policy.

9. Notifying Parents or Carers

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

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

If we believe that notifying the parents or carers 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 or carers of all the children involved.

10. Students with Special Educational Needs and Disabilities

We recognise that students with special educational needs (SEN) or disabilities or certain health conditions 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 or bullying (including prejudice-based bullying) than other students
- ▲ The potential for students with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- ▲ Communication barriers and difficulties in managing or reporting these challenges

11. Students 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

12. 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, Katherine Hurst, 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

13. Complaints and Concerns about the College's 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.

Records will include:

- ▲ A clear and comprehensive summary of the concern

- ▲ Details of how the concern was followed up and resolved
- ▲ A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child.

Any 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.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

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 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 and online safety, 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 integrated, aligned and considered as part of the whole-college safeguarding approach and wider staff training, and curriculum planning
- ▲ Be in line with advice from the three safeguarding partners
- ▲ Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils

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.

See Appendix 2 of this policy for more information about our safer recruitment 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 Policy 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
- ▲ Safer Recruitment Policy

18. Appendices

These appendices are based on the Department for Education's statutory guidance, **Keeping Children Safe in Education 2021**.

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

Recruitment and selection process

The recruitment steps outlined below are based on Part 3 of Keeping Children Safe in Education. For more information, see the College's Safer Recruitment Policy.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- ▲ Our College's commitment to safeguarding and promoting the welfare of children
- ▲ That safeguarding checks will be undertaken
- ▲ The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- ▲ Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- ▲ Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- ▲ Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders
- ▲ Ask candidates to complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information
- ▲ Ask candidates to sign a declaration confirming the information they have provided is true

Shortlisting

Our shortlisting process will involve at least two people and will:

- ▲ Consider any inconsistencies and look for gaps in employment and reasons given for them
- ▲ Explore all potential concerns

Seeking references and checking employment history

The purpose of seeking references is to obtain objective and factual information to support appointment decisions. They will always be sought and obtained directly from the referee. References or testimonials provided by the candidate will never be accepted.

In line with the statutory guidance (*Keeping Children Safe in Education*), references will be sought on all short listed candidates, including internal ones, before interview so that any issues of concern they raise can be explored further with the referee, and taken up with the candidate at interview.

References will be obtained from the candidate's current or most recent employer and will cover at least the last 5 years of employment.

Referees will always be asked specific questions about:

- ▲ the candidate's suitability for working with children and young people
- ▲ any disciplinary warnings, including time-expired warnings that relate to the safeguarding of children
- ▲ the candidate's suitability for this post.

When seeking references, we will:

- ▲ Liaise directly with referees and verify any information contained within references with the referees
- ▲ Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the Headteacher/Principal as accurate in respect to disciplinary investigations
- ▲ Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- ▲ Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- ▲ Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- ▲ Resolve any concerns before any appointment is confirmed

Interview and selection

In line with the requirements of the School Staffing (England) Regulations 2009 at least one of the persons who conducts an interview will have completed appropriate safer recruitment training.

The interview will assess the merits of each candidate against the job requirements, and explore their suitability to work with children. The selection process for people who will work with children will always include a face-to-face interview even if there is only one candidate.

Interview panels will consist of a minimum of two people and would normally involve the line manager, and a leadership team representative.

When interviewing candidates, we will:

- ▲ Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- ▲ Explore any potential areas of concern to determine the candidate's suitability to work with children
- ▲ Record all information considered and decisions made

Pre-appointment vetting checks

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

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. 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 obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of this for longer than 6 months but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- ▲ 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. Where available, these will include:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
 - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked

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

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- ▲ There are concerns about an existing member of staff's suitability to work with children; or
- ▲ An individual moves from a post that is not regulated activity to one that is; or
- ▲ There has been a break in service of 12 weeks or more

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
- ▲ We believe the individual has received a caution or conviction for a relevant offence (automatic barring either with or without the right to make representations) under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- ▲ We believe 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

Section 1: Allegations that may meet the harms threshold

This Appendix is based on 'Section 1: Allegations that may meet the harms threshold' in Part 4 of Keeping Children Safe in Education. For further information, see the College's Allegations of Abuse Made Against Staff Policy.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, 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; this includes behaviour taking place both inside and outside of college

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

A 'case manager' will lead any investigation. This will be the Principal, or the chair of governors where the Principal is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

If in doubt, the case manager will seek views from the College's Human Resources adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

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 or to cause harm to the subject of the allegation
- ▲ **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 case manager will take the following steps:

- ▲ Conduct basic enquiries in line with the College's Allegations of Abuse Made Against Staff Policy and local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- ▲ 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
- ▲ Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- ▲ **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 college 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 (only in relation to their child – no information will be shared regarding the staff member)
- ▲ 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 College 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 teachers and all contracted staff

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

- ▲ We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- ▲ The Principal will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the College, 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 LADO 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

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- ▲ 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 College will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the College will consider 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, unfounded, false or malicious reports

If a report is:

- ▲ Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- ▲ Shown to be deliberately invented, or malicious, the College will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- ▲ Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- ▲ Shown to be deliberately invented, or malicious, the College will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- ▲ A clear and comprehensive summary of the allegation

- ▲ Details of how the allegation was followed up and resolved
- ▲ Notes of any action taken, decisions reached and the outcome
- ▲ A declaration on whether the information will be referred to in any future reference

In these cases, the College will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

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.

References

When providing employer references, we will:

- ▲ Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- ▲ Include substantiated allegations, provided that the information is factual and does not include opinions

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 College'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

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the College that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in Part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in Section 1 above.

Concerns may arise through, for example:

- ▲ Suspicion

- ▲ Complaint
- ▲ Disclosure made by a child, parent or other adult within or outside the College
- ▲ Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

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

- ▲ Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- ▲ Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- ▲ Being overly friendly with children
- ▲ Having favourites
- ▲ Taking photographs of children on their mobile phone
- ▲ Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- ▲ Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- ▲ Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- ▲ Empowering staff to share any low-level concerns as per Section 7.7 of this policy
- ▲ Empowering staff to self-refer
- ▲ Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- ▲ Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- ▲ Helping to identify any weakness in the College's safeguarding system

Responding to low-level concerns

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

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

The Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the College's Disciplinary Policy.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- ▲ Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- ▲ Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in Section 1 of this appendix, we will refer it to the designated officer at the local authority
- ▲ Retained at least until the individual leaves employment at the College

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- ▲ The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- ▲ The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

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 child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants 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.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

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 college (usually the designated safeguarding lead) before the child or children arrive at college 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
- ▲ Refer the student to an education welfare officer, pastoral support manager or 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 college 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 College's measures to prevent radicalisation are set out in other college policies and procedures, including the Tackling Extremism and Radicalisation Policy.

Peer-on-peer abuse

Peer-on-peer abuse is when children abuse other children. This type of abuse can take place inside and outside of college and online.

Peer-on-peer abuse is most likely to include, but may not be limited to:

- ▲ Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- ▲ Abuse in intimate personal relationships between peers
- ▲ Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- ▲ Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- ▲ Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- ▲ Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- ▲ Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- ▲ Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

- ▲ Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about peer-on-peer abuse, or a child makes a report to them, they will follow the procedures set out in Section 7 of this policy, as appropriate. In particular, Sections 7.8 and 7.9 set out more detail about our College's approach to this type of abuse.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- ▲ Between two children of any age and sex
- ▲ Through a group of children sexually assaulting or sexually harassing a single child or group of children
- ▲ Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- ▲ Challenging inappropriate behaviours
- ▲ Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- ▲ Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in Section 7 of this policy, as appropriate. In particular, Sections 7.8 and 7.9 set out more detail about our College's approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- ▲ Increased absence from school
- ▲ Change in friendships or relationships with older individuals or groups
- ▲ Significant decline in performance
- ▲ Signs of self-harm or a significant change in wellbeing
- ▲ Signs of assault or unexplained injuries
- ▲ Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

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

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

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 College 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 College any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using college 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.

19. History of Changes

August 2020

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

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 girls will be victims and boys perpetrators</i>	Legal experts (Forbes Solicitors) advised against using specific examples in the policy, despite it 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

September 2021

POLICY SECTION	AMENDMENT	REASON
Important contacts	Helen Prince Barry Musk	Change in Governor roles
Section 2	Updated the date where we refer to Keeping Children Safe in Education (KCSIE)	To reflect the 2021 version of the document
Section 3	Updated the term 'sexting' so that we use 'sharing of nudes and semi-nudes'	To reflect the new terminology used throughout KCSIE
Section 4	Added 'health conditions' in the first bullet on children who have special educational needs (SEN) or disabilities	To reflect a change in wording in paragraph 185 of KCSIE
Section 4	Included children who are missing from education, and children whose parent/carer has expressed an intention to educate them at home, as extra bullet points	To reflect the addition of these children under the section on children potentially at greater risk of harm in KCSIE (paragraphs 164 and 165-168)
Section 5.1	Added that staff will sign a declaration to say they've read the guidance at the beginning of each academic year	To reflect College practice
Section 5.1	Included the College's online safety policy in the first bullet point	To reflect the new emphasis on online safety in KCSIE (paragraph 85)
Section 5.1	Added 'child criminal exploitation (CCE)' as another example of a specific safeguarding issue	To reflect the new text on CCE in paragraphs 33-35 of KCSIE which emphasises the importance of CCE as a safeguarding issue staff should be alert to
Section 5.1	Added the last bullet point on reassuring victims that they are being taken seriously and will be supported and kept safe	To reflect the new paragraph 18 of KCSIE
Section 5.3	Added the first bullet point explaining that the governing body will facilitate a whole-college approach to safeguarding	To reflect the new paragraph 82 of KCSIE
Section 5.3	Added the word 'evaluate' to the second bullet	To clarify the expectations of the governing board
Section 5.4	Under the first bullet point, added the second sub-bullet point to say staff should understand and follow the procedures included in the policy, particularly those concerning referrals of cases of suspected abuse and neglect	To reflect the new paragraph 81 of KCSIE

Section 5.4	Clarified that the Principal should update the content of staff training regularly	For clarity and best practice
Section 7.2	Added wording to the final bullet point to clarify that staff should not disclose information to anyone else unless told to do so by a relevant authority involved in the safeguarding process	To emphasise confidentiality and protection of those involved
Section 7.3	Elaborated on the circumstances in which a teacher must report to the police if they discover – whether through disclosure by the victim or visual evidence – that an act of FGM appears to have been carried out on a girl under 18	Clarification as per the government guidance on mandatory reporting of FGM
Section 7.7	Added references to 'contractor' in the heading and throughout section 7.7	To reflect paragraph 74 of KCSIE which now includes contractors
Section 7.7	Clarified that staff should report concerns/allegations 'as soon as possible'	To reflect the new paragraph 341 in KCSIE about reporting without delay
Section 7.7	Added a new paragraph explaining that a staff member should report a concern/allegation directly to the local authority designated officer if they believe there's a conflict of interest in reporting to the Principal	To reflect the new wording in paragraph 74 of KCSIE
Section 7.8	Added wording to the first paragraph saying that abuse will never be tolerated, 'as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils'	To reflect the same new wording in paragraph 145 of KCSIE (sixth bullet point)
Section 7.8	Replaced 'sexting' with 'the sharing of nudes and semi-nudes'	To reflect the new terminology used throughout KCSIE
Section 7.8	Added a reference to Appendix 4	To reflect the additional information we have in the policy on peer-on-peer abuse in Appendix 4
Section 7.8	Added a subsection heading 'Procedures for dealing with allegations of peer-on-peer abuse'	To improve the flow and structure of the section
Section 7.8	At the end of the subsection on 'Procedures for dealing with allegations of peer-on-peer abuse', added explanation of College procedures around investigating and dealing with allegations, and supporting victims, perpetrators and any other children affected	To reflect the wording in paragraph 145 of KCSIE in terms of what we are expected to include in our policy (third and fourth bullet point)

Section 7.8	Added a new subsection on 'Creating a supportive environment in school and minimising the risk of peer-on-peer abuse'. This incorporates the bullet point list we previously had about how to minimise the risk of peer-on-peer abuse	To reflect new guidance and expectations around being aware of, responding to reports of and minimising the risk of peer-on-peer abuse, in paragraphs 18, 46 to 48, 50 and 440 to 443 of KCSIE
Section 7.9	Replaced 'sexting' with 'the sharing of nudes and semi-nudes'	To reflect the new terminology used throughout KCSIE
Section 7.10	New section on reporting systems for students	To reflect the new expectations on reporting systems for pupils that schools should have and include in their child protection policy, in paragraphs 83, 85 and 145 of KCSIE
Section 8	New section covering the College's approach to online safety and mobile technology (and the following sections re-numbered accordingly) Note: this section also replaces our previous Section 12 on mobile phones and cameras	To reflect the new expectations around what schools should include in their child protection policy, in paragraphs 85 and 126 of KCSIE.
Section 9	Added 'or carers' to the section heading and throughout the section	For clarity
Section 10	Updated with new wording to include students with certain health conditions, and expand on the additional barriers that can exist in recognising abuse and neglect	To reflect the new wording in paragraph 185 of KCSIE
Section 14	Added new wording around what records should include and that it's good practice to keep concerns and referrals in a separate file	To reflect the new wording in paragraph 71 of KCSIE
Section 14	Added new wording about keeping records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA)	For clarity
Section 15.1	Included references to 'online safety'	To reflect new wording in paragraph 14 of KCSIE
Section 15.1	Added a new bullet point to explain that staff training should be integrated, aligned and considered as part of the whole-college safeguarding approach and wider staff training, and curriculum planning	To reflect new wording in paragraph 117 of KCSIE
Section 15.1	Added a new bullet point to explain that staff training should have regard to the Teachers' Standards	To reflect new wording in paragraph 118 of KCSIE

Section 15.4	Added a reference to Appendix 2	To sign post readers to the appendix on safer recruitment
Appendix 2	Added a new section on the recruitment and selection process	To reflect the new guidance on the topic in paragraphs 192 to 210 of KCSIE
Appendix 2	Included a section heading for 'Pre-appointment vetting checks'	To improve the flow and structure of the section
Appendix 2	Added new wording under the subsection 'New staff' to clarify that offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks	To reflect paragraph 213 of KCSIE (This is not new. The previous version of KCSIE made the same point, and we've opted to include it for extra clarity)
Appendix 2	Added new wording under the subsection 'New staff' to clarify that we should obtain a DBS certificate before, or as soon as practicable after, appointment, including when using the DBS update service	To reflect the new wording in paragraph 223 of KCSIE
Appendix 2	Added new wording under the subsection 'New staff' to clarify that we can keep a record of the result of the check and recruitment decisions taken when a DBS copy is destroyed	To reflect the new paragraph 258 of KCSIE
Appendix 2	Added a new bullet point under the subsection 'Existing staff' to explain that we should carry out checks on existing staff if they've had a break in service of 12 weeks or more	To reflect the new wording in paragraph 327 of KCSIE
Appendix 2	Updated the wording under the subsection 'Existing staff' to clarify when to refer individuals to the DBS	To reflect the new wording in paragraph 329 of KCSIE
Appendix 3	Restructured so it now has two sections covering two levels of allegation. Section 1 is about allegations that may meet the harms threshold (this broadly reflects the appendix as it was in the previous version of our policy – for specific changes see below). Section 2 is about concerns that do not meet the harms threshold, and is entirely new	To reflect Part 4 of KCSIE which is now split into 2 sections
Appendix 3, Section 1	Clarified that the section applies to 'contractors'	To reflect paragraph 338 of KCSIE which now includes contractors
Appendix 3, Section 1	Clarified that the final bullet point at the beginning of the section includes behaviour taking place both inside and outside of the College Note: in the previous version of our policy this message came after the bullet point list	To reflect the new paragraph 339 of KCSIE

Appendix 3, Section 1	Removed the line 'Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police'.	This is no longer in KCSIE. Instead, there's a new paragraph (404) on non-recent allegations, which are covered with a new final subsection (explained later in this document)
Appendix 3, Section 1	Added wording about a case manager leading any investigation	To reflect paragraph 341 of KCSIE
Appendix 3, Section 1	Added new wording at the end of the subsection on suspension to explain that if in doubt the case manager will seek views from other stakeholders	To reflect new wording in paragraph 361 of KCSIE
Appendix 3, Section 1	Added new wording to the definition of a malicious allegation to include 'or to cause harm to the subject of the allegation'	To reflect new wording in paragraph 381 of KCSIE
Appendix 3, Section 1	Added a new first bullet point to the list of steps the case manager will take when dealing with allegations (under the subsection 'Procedure for dealing with allegations'), to explain that the case manager will begin by conducting basic enquiries in line with local procedures Note: in light of this addition, we removed the word 'immediately' at the beginning of the following bullet point so it now starts with 'Discuss the allegation...'	To align with the College's Allegations of Abuse Made Against Staff Policy
Appendix 3, Section 1	Added the fifth bullet point to the list of steps the case manager will take when dealing with allegations, to explain that if the case manager is concerned about the welfare of any other children they will discuss this with the DSL	To align with the College's Allegations of Abuse Made Against Staff Policy
Appendix 3, Section 1	Reworded the penultimate bullet point in the list of steps the case manager will take when dealing with allegations, to clarify that the case manager will not share any information with parents about the member of staff concerned	To align with the College's Allegations of Abuse Made Against Staff Policy
Appendix 3, Section 1	Added references to 'contracted staff' to the subsection on additional considerations for supply teachers, and used 'individual' (instead of 'supply teacher' as previously) to cover both supply teachers and other contracted staff	To reflect paragraph 356 of KCSIE

Appendix 3, Section 1	Added some wording to the subsection on 'Timescales' to clarify that the timescales will be met where reasonably practicable, and what will happen if they're not met	To allow for circumstances where we are not able to adhere to your planned timescales
Appendix 3, Section 1	Clarified in the subsection on concluding a case where the allegation is substantiated, that the College will make a referral to the DBS (previously we said 'the case manager and the College's HR will discuss this matter with the designated officer'). Similarly, we have clarified that the College will consider whether to refer the matter to the Teaching Regulation Agency	To reflect new wording in paragraphs 383 and 384 of KCSIE
Appendix 3, Section 1	Added a new subsection about unsubstantiated, unfounded, false or malicious reports	To reflect new wording in paragraph 389 of KCSIE
Appendix 3, Section 1	Added wording under 'Unsubstantiated, unfounded, false or malicious allegations' to clarify that the LADO and case manager will consider next steps and that if an allegation is shown to be deliberately invented or malicious, the College will consider possible disciplinary action	To reflect new wording in paragraphs 388 and 389 of KCSIE
Appendix 3, Section 1	Updated the wording in the 'Record-keeping' subsection	To reflect new wording in paragraph 397 of KCSIE
Appendix 3, section 1	In the 'References' subsection, added 'unfounded' to the first bullet point and added a second bullet point about substantiated allegations	To reflect new wording in paragraph 401 of KCSIE
Appendix 3, section 1	Added a final line in the 'Learning lessons' subsection, about the case manager determining whether any improvements can be made	To reflect the new paragraph 403 of KCSIE
Appendix 3, section 1	Added a new final subsection on 'Non-recent allegations'	To reflect the new paragraph 404 of KCSIE
Appendix 3, section 2	As noted above, this section is new	To reflect part 4 of KCSIE which is now split into 2 sections (concerns that do not meet the harm threshold are covered in paragraphs 406 to 426)
Appendix 4	Clarified that child sexual exploitation is a form of child sexual abuse	To reflect new wording in paragraph 36 of KCSIE
Appendix 4	Added more information about types of domestic abuse	To reflect new wording on domestic abuse on page 128 of KCSIE
Appendix 4	Added a section on peer-on-peer abuse	To reflect the new emphasis in KCSIE on staff knowing about this type of abuse

		(for example, in paragraph 24, 46 and 49)
Appendix 4	Added a section on sexual violence and sexual harassment between children in schools	To reflect the recent review by Ofsted on sexual abuse in schools - this section in our policy is based on pages 135 to 136 of KCSIE
Appendix 4	Added a section on serious violence	To reflect new wording in paragraphs 51 to 52 of KCSIE and the new emphasis in KCSIE to reflect serious violence in our child protection policy (paragraph 85)