The Chalfonts Community College

Child Protection & Safeguarding Policy

2024 - 2025

Approved by:	FGB	Date: 30th September2024
Last reviewed on:	June 2024	
Next review due by:	September 2025	

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Morag Wall	01753 881675 moragwall@chalfonts.org
Deputy DSL	Michelle Austin	01753 881738 michelleaustin@chalfonts.org
Safeguarding Officers	Mr J Howard Ms S Jones Mrs C Whitehead	
Designated Teacher for Looked After Child (DT for LAC)	Morag Wall	01753 881675 moragwall@chalfonts.org
Mental Health Lead	Morag Wall	01753 881675 moragwall@chalfonts.org
Nominated Safeguarding Governor	Mr Stuart Dennis	
Chair of governors	Mr Peter Solloway	

1. Aims

The school aims 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 trained in recognising and reporting safeguarding issues

Chalfont Community College (CCC) is committed to safeguarding and promoting the physical, mental and emotional welfare of every student, both inside and outside of the college premises and expects all staff and volunteers to share this commitment. We implement a whole school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of both our students and staff is at the forefront of all action taken.

Safeguarding determines the actions we at CCC take to keep children safe and protect them from harm in all aspects of their life. As a school we recognise that 'it could happen here', indeed recognising that 'it does happen here' and therefore we are continually being proactive to ensure that every member of CCC is proactive in their responsibility to Safeguard each member of the Chalfont Community. CCC works closely with other external agencies and parents/carers in order to safeguard our young people.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance.

It will be achieved by:

- Ensuring that members of the Governing body, the Principal and all staff understand their responsibilities under safeguarding legislation and statutory guidance, and are alert to the signs of child abuse, and know to refer any concerns to the Safeguarding Team.
- Teaching students how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any student that has been subject to, or is at risk of abuse, neglect, or exploitation.
- Delivering staff CPD (Continuing Professional Development) on Safeguarding issues throughout the academic year for all stakeholders of the Chalfont Community.
- Using Safeguarding meetings to regularly review and reflect on practice in order to inform best practice moving forward.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that the Principal and any new staff and volunteers are only appointed when all the appropriate checks (which includes all statutory checks on staff and regular volunteers including Enhanced DBS (disclosure and barring service) checks) have been satisfactorily completed.

The purpose of the policy is to ensure that Safeguarding concerns and referrals are handled sensitively, professionally and in ways that support the needs of the children.

We continually strive to ensure that consistent and effective safeguarding procedures are in place to support all stakeholders within the Chalfont community.

The Chalfonts Community College is proud of our diverse school community and ensure that liaison with external professionals (such as the Traveller Liasion Officer) is completed regularly to prevent barriers to learning.

Our school procedures for all staff, supply staff, governors, volunteers, visitors and contractors in safeguarding and protecting children from harm are in line with Buckinghamshire Council and Buckinghamshire Safeguarding Children Partnership safeguarding procedures, **"Working Together to Safeguard Children 2024"**

"Keeping Children Safe in Education 2024" **https://assets.publishing.service.gov.uk/media/6650a1967b792ffff71a83e8/Keeping_children_safe_in_education_2024.pdf** and statutory guidance issued under section 29 of the **Counter Terrorism and Security Act 2015** Revised Prevent duty guidance: for England and Wales - GOV.UK (www.gov.uk).

Contacts in The Local Authority

Education Safeguarding Advisory Service **ESAS** offers support to education providers to assist them to deliver effectively on all aspects of theirsafeguarding responsibilities	01296 387981 Secure- esasduty@buckinghamshire.gov.uk
First Response Team (aka MASH) (including Early Help, Channel) The First Response Team process all new referrals to social care, including children with disabilities. Referrals are assessed by the team to check the seriousness and urgency of the concerns and whether Section 17 and/or Section 47 of the Children Act 1989 apply. The First Response Team will ensure that the referral reaches the appropriate team for assistance in a quick and efficient manner.	01296 383962 Out of hours 0800 999 7677 Secure- cypfirstresponse@buckinghamshire.gov.uk
Local Authority Designated Officer (LADO) The Buckinghamshire Local Authority Designated Officer (LADO) is responsible for overseeing the management of all allegations against people in a position of trust who work with children in Buckinghamshire on either a paid or voluntary basis	01296 382070 Secure- lado@buckinghamshire.gov.uk
Bucks Family Information Service https://familyinfo.buckinghamshire.gov.uk Information for families on a range of issues including childcare, finances, parenting and education	01296 383065
Other Local Authorities -	Hillingdon Children's Services 01895 556633 Hertfordshire Children's Services 0300 123 4043 Slough Children's Services www.sloughchildrenfirst.co.uk 01753 477321
Buckinghamshire Safeguarding Children Partnership (BSCP) https://www.buckssafeguarding.org.uk/childrenpartnership Procedures, policies and practice guidelines	
Thames Valley Police	101 (999 in case of emergency)

2. Legislation and statutory guidance

Policies and Processes:

There are a number of related policies and procedures linked to safeguarding, some of which are a statutory requirement, and some are considered to be best practice in order to support us with our collective responsibility of Keeping Children Safe in Education (2024).

This policy meets the statutory requirement for schools to have in place a Child Protection Policy and clearly explains the process and procedures that CCC has in place to ensure all students are kept safe and protected from harm and that all the adults in our School are clear of their role and responsibilities.

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

This policy is based on the Department for Education's (DfE's) statutory guidance **https://assets.publishing.service.gov.uk/media/6650a1967b792ffff71a83e8/Keeping_children_safe_in_education_2024.pdf** and Working Together to Safeguard Children (2023), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

Legislation

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- 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
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Principal should carefully consider how they are supporting their pupils

with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

Statutory Guidance

- DfE (2015) 'The Prevent duty'
- DfE (2024) 'Working Together to Safeguard Children'
- DfE (2018) 'Disqualification under the Childcare Act 2006
- DfE (2023) 'Keeping children safe in education 2024'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- Home Office and Foreign, Commonwealth and Development Office (2022) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory Guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2018) 'Information sharing'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- Dfe (2021) 'Teachers Standards'
- DfE (2022) 'Recruit teachers from overseas'
- DfE (2021) 'Sexual violence and sexual harassment between children in schools and colleges'

3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- 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 protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

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 where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

The following 3 **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:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

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

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

Rape: A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.

Assault by penetration: A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.

Sexual assault: A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third

party.

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

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence.

This includes:

- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Sharing unwanted explicit content.
- Upskirting.
- Sexualised online bullying.
- Unwanted sexual comments and messages, including on social media. – Sexual exploitation, coercion, and threats.

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

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

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

Acronyms

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

Acronym	Long Form	Definition
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CLA (LAC)	Child Looked After	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
CP Lead	Child Protection Lead	CP Lead for a Local Authority.
CSCS	Children's social care Services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.
DSL & DDSL	Designated safeguarding lead & Deputy designated safeguarding lead	DSL - A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school. DDSL – a non-teacher who has the same responsibility and training as the DSL
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).

EHA	Early Help Assessment	The EHA provides a tool for assessing a family and facilitating early intervention. The aim is to identify, at the earliest opportunity, where a family's needs are not being met, and provide timely and coordinated support to meet those needs.
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for students who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the student.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FSS	Family Support Service	FSS (Bucks) offers support to children, young people and families (Levels 2 and 3)
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
ITT	Initial teacher training	A programme of training to achieve qualified teacher status
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.

LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LADO	Local authority designated office	The LADO is responsible for providing advice, information and guidance to employers and voluntary organisations around allegations and concerns regarding paid and unpaid workers.
LGBTQ+	Lesbian,gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which students learn about themselves, other people, rights, responsibilities and relationships.
PHE	Public Health England	An executive agency of the Department of Health and Social Care which aims to protect and improve the nation's health and wellbeing.
QTS	Qualified teacher status	A requirement in England to work as a teacher of children in state schools and special schools.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all students. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.

SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to students with special educational needs.
SEND	Special educational needs and Disabilities	A student is assessed to have SEND if they have a learning problem or disability that makes it more difficult for them to learn than most student's their age.

SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.

4. Equality statement

Some children have an increased risk of abuse, both online and offline, 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 and/or disabilities (SEND) 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 or absent from education for prolonged periods and/or repeat occasions
- 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 school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Update with KCSIE 2024 and review this guidance at least annually
    - Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
    - Undertake safeguarding training, including online safety training, during their induction and at subsequent regular intervals.
    - Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
    - Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns
    - Consider, at all times, what is in the best interests of the student.
    - Maintain an attitude of 'it could happen here' where safeguarding is concerned. At CCC we actively promote to staff that 'it does happen here'.
    - Provide a safe environment in which students can learn.
- Be aware of the school's 's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
    - All Staff must maintain a good working knowledge of the Buckinghamshire Continuum of Need The Continuum of Need - Buckinghamshire Safeguarding Children Partnership (buckssafeguarding.org.uk) and any updates and how it should be used to inform decision making regarding a referral to First Response.
    - Be aware of the role and identity of the DSL and deputy DSL.
    - Our systems which support safeguarding, including this child protection and safeguarding policy, the staff Code of Conduct, and Behaviour Policy, E-Safety and Online Safety Policy the role and identity of the designated safeguarding lead (DSL) and Deputy DSL, the safeguarding response to children who go missing from education

- The early help assessment process 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 for students who may benefit from early help from the Family Support Service (FSS).
- 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, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection
- Staff are required to report any causes of concern to the school safeguarding team via CPOMS. All concerns raised from CPOMS are acted upon ideally on the day of receipt and monitored by the safeguarding team to ensure appropriate follow up.

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 Mrs Morag Wall. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Outside of Term Time the DSL is contactable via email - moragwall@chalfonts.org and or mobile

When the DSL is absent, the Deputy DSL – Mrs Michelle Austin – will act as cover.

If the DSL and Deputy DSL are not available, our other safeguarding officers are -
Mr J Howard,
Ms S Jones & Mrs C Whitehead
Who will act as cover (for example, during out-of-hours/out-of-term activities).

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 (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Will be the Schools Prevent Lead.

The DSL will also:

- Keep the principal informed of any issues
- Create a culture of safeguarding within the school where children are protected from harm.
- Ensure all staff receive an effective induction and ongoing training to support them to recognise and report any concerns.
- Ensure children receive the right help at the right time using the Buckinghamshire Continuum of Need document.
- Ensure referrals to partner agencies, are followed up in writing, including referrals to First Response and Early Help (FSS).
- Establish and maintain a safe and secure system for reporting and recording safeguarding and child protection records. These records must be audited regularly to ensure all actions are completed.
- Ensuing all child protection files are held separately from pupils' educational records.
- Maintain the record for staff safeguarding training.
- Ensure that the safeguarding team contact details and photos are displayed in prominent areas around the school and also on the website.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

› Refer cases:

- To CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.

- To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
- To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
- To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Any other program deemed relevant to support and protect students ie. RU Safe!
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Liaise with the Principal to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the Deputy DSL to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officer(s) (LADO) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that student's needs are considered holistically.
- Liaise with the relevant, Mental Health Support Teams and school counsellors, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.

› Work with the Principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school.

This includes:

Ensuring that the school knows which students have or had a social worker.

Understanding the academic progress and attainment of these students.

Maintaining a culture of high aspirations for these students.

- Supporting teachers to provide additional academic support or reasonable adjustments to help these students reach their potential.
- Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these students are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a student's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training and update this training at least every two years.

- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to students and taking account of their wishes and feelings; this includes understanding the difficulties students may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- The designated teacher which at CCC is the DSL, has a responsibility for promoting the educational achievement of CLA and previously CLA (PLAC), and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

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

5.3 The governing board

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Complete safeguarding training on appointment, to also include Prevent training. This training must be regularly updated in line with national or local guidance.
- Make sure that students are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any check beyond what is required.
- Ensure that staff are appropriately trained to support students to be themselves at school, e.g. if they are LGBTQ+.
- Ensure the college has clear systems and processes in place for identifying possible mental health problems in students, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff receive safeguarding and child protection training updates, as required, but at least annually.
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle students' allegations against other students.

- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of students and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.
- Guarantee that there are systems in place for students to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of CLA students and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the virtual school head (VSH) to discuss how the student premium funding can best be used to support CLA.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep CLA safe, particularly with regard to the student's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for students who go missing from CCC, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the principal to account for its implementation
- Ensure the DSL completes an Annual Safeguarding Report for Governors and a copy is shared with the Education Safeguarding Advisory Service at Buckinghamshire Council
- Appoint a Link Governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL The Nominated Governor must:
- Work with the DSL to produce the Child Protection Policy annually.
- Ensure child protection is regularly discussed at Governing Body meetings Meet at least termly with the DSL to review and monitor the school's delivery on its safeguarding responsibilities, to review the Single Central Record and complete an audit of the staff files. Take responsibility to ensure that the school is meeting the OFSTED requirements as set out in the inspection guidance: Education inspection framework (EIF) - GOV.UK (www.gov.uk)
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

› Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

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 of this policy has information on how governors are supported to fulfil their role.

5.4 The Principal

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

- Ensuring that staff (including temporary staff) and volunteers:
- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- 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/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Overseeing the safe use of technology, mobile phones and cameras in the setting
-

5.5 Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

5.6 Visitors must be

Clearly identified with visitor/contractor passes.

Met and directed by school staff/representatives.

Signed in and out of the school, by school staff via the electronic signing in system. · Given a safeguarding leaflet to read or directed to a poster informing them of how to report a concern Given restricted access to only specific areas of the school, as appropriate.

Escorted by a member of staff/representative as required.

Given access to pupils restricted to the purpose of their visit

6. Confidentiality

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

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

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

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

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

with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

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

Where a student is leaving CCC, the DSL will consider whether it is appropriate to share any information with the student's new provider, in addition to the child protection file, that will allow the new provider to support the student and arrange appropriate support for their arrival.
As a school we will work with CSCS, the police, health services and other services to protect the welfare of our students, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for early help is identified, CCC will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.
CCC also recognises the particular importance of inter-agency working in identifying and preventing CSE.
CCC also recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet students' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes. Data protection regulations do not act as a barrier to sharing information where failure to do so would result in the student being placed at risk of harm.

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

Confidentiality is also addressed in this policy with respect to record-keeping in section 14.

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime

- Is frequently missing/goes missing from care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

CCC recognises that some groups of students can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in these groups of students. (Sections 10-12) Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

Home-educated Children
Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them. In line with the Education (Student Registration) (England) Regulations 2006, CCC will inform the LA of all deletions from the admissions register when a student is taken off roll.

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

LGBTQ+ students
The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ students can be targeted by other individuals. Staff will also be aware that, in some cases, a student who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as students who identify as LGBTQ+. Staff will also be aware that the risks to these students can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these students and provide a safe space for them to speak out and share any concerns they have.

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

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

Make a referral to children's social care Report a Concern - Professional - Buckinghamshire Safeguarding Children Partnership (buckssafeguarding.org.uk)
and/or the police (999) **immediately** if you believe a child is suffering or likely to suffer from harm, or is 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.
Staff are required to report any causes of concern to the school safeguarding team via CPOMS.
All concerns raised from CPOMS are acted upon ideally during the day of receipt or as soon as is practical and monitored by the safeguarding team to ensure appropriate follow up.

Parents of CCC students are informed that should they have any serious concerns about their child(ren), another student or a member of staff at CCC they are to contact the Designated Safeguarding Lead (DSL) who will be able to provide them with the best advice and help using the appropriate degree of confidentiality.

All CCC stakeholders (including the local community) are able to register any safeguarding concerns that they may have via our anonymous online reporting system – Whisper: The Chalfonts Community College - Safeguarding

Should you have concerns about online sexual abuse or the way someone has been communicating with you online, you can report your concerns to the Child Exploitation & Online Protection Centre directly by clicking on the CEOP website.
https://www.ceop.police.uk/Safety-Centre

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 either at the time (or afterwards) as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- You then need to alert the SG Team of the disclosure via CPOMS at your earliest convenience. Remember if the child has disclosed that significant harm has or will happen – it is your responsibility to alert the DSL straight away. 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

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

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

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 pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

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 mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil 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 pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

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)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

If a member of staff has any concern about a student's welfare, or a student has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by speaking to the DSL or deputy DSL. All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the Confidentiality section of this policy.

Staff will be aware that students may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, if they have a concern about a student.

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

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

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

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

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

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

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 details of any

actions you take with the DSL as soon as practically possible.

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.

Report a Concern - Professional - Buckinghamshire Safeguarding Children Partnership (buckssafeguarding.org.uk

Early help assessment

If an early help assessment 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.

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

Are disabled, have certain health conditions, or have specific additional needs.

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

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

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

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school 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.

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 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.

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

The DSL will work alongside external agencies, maintaining continuous liaison, including multi agency liaison where appropriate, in order to ensure the wellbeing of the students involved. The DSL will work closely with the police to ensure the College does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

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

The College will not wait for the start or outcome of an investigation before protecting the victim and other students: this applies to criminal investigations as well as those made by CSCS. Where CSCS decide that a statutory investigation is not appropriate, CCC will consider referring the

incident again if it is believed that the student is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and the College agrees with this decision, CCC will consider the use of other support mechanisms, such as early help and pastoral support.

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

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. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy 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 DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. 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 concern about mental health

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.

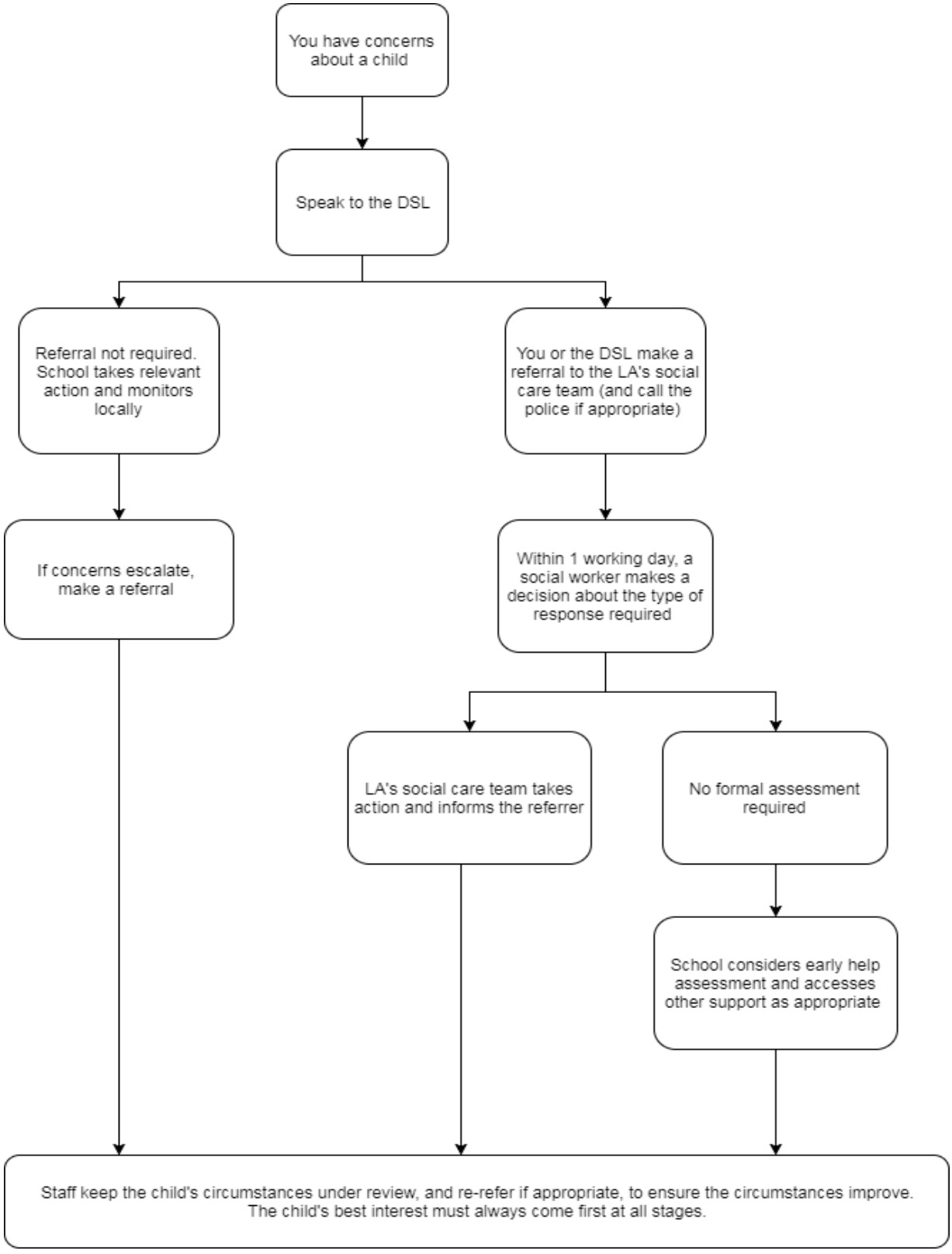
Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

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 DSL to agree a course of action.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.7 Concerns about a staff member, supply teacher, volunteer or contractor

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/vice-principals or DSL 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 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).

All allegations against staff, supply staff, volunteers and contractors will be managed in line with the School's Allegations of Abuse against Staff (Appendix in this Policy), CCC will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

When managing allegations against staff, CCC will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns", as defined in the Allegations of Abuse against Staff (Appendix in this Policy)

Allegations that meet the harms threshold include instances where staff have:

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

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

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Where the governing body hires or rents out College facilities or the College premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep students safe.

Where the governing body provides the activities under the direct supervision or management of college staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the governing body will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The governing body will also ensure that there are arrangements in place to liaise with CCC on these matters where appropriate. The governing body will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises and specify that failure to comply with this would lead to termination of the agreement.
Extra-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will

work in collaboration with the College to effectively safeguard students and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of students. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

7.8 Allegations of abuse made against other pupils

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 child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and 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 pupils in the school at risk
- Is violent
- Involves pupils 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)

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

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support 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. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

For the purposes of this policy, **"child-on-child abuse"** is defined as abuse between children.
All staff will be aware that child-on-child abuse can occur between pupils of any age and gender,

both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on child abuse. All staff will understand the importance of challenge inappropriate behaviour between peers and will not tolerate abuse as "banter" or "part of growing up". Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as 'teenage relationship abuse'.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

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

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

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

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

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

The College's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the school's Anti-bullying Policy and Behaviour for Learning Policy, where relevant.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

- We recognise the importance of taking proactive action to minimise the risk of child-on-child 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 pupils about appropriate behaviour and consent
- Ensure pupils 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
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, 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 pupil 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 child-on-child 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
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

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

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

Where a member of staff becomes aware of an incident of the taking and sharing of inappropriate/indecent images of a student, they will refer this to the DSL as soon as possible.

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 pupil 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 pupil to delete it
- Ask the pupil(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 pupil(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 pupil(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 school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) 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 or videos from devices or online services
- Any relevant facts about the pupils 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 pupils involved (in most cases parents/carers should be involved)

The DSL alongside one other member of the Safeguarding team and / or Year Team will attempt to understand what the image contains (without viewing it) and the context surrounding its creation and distribution – they will categorise the incident into one of two categories:

Aggravated: incidents which involve additional or abusive elements beyond the creation and distribution of indecent images of students, including where there is an adult involved, where there is an intent to harm the student depicted, or where the images are used recklessly.

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

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

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

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

- Never copy, print, share, store or save them as this is illegal – if this has already

happened, contact the local police for advice and to explain the circumstances.

- Discuss the decision with the Principal or Vice-Principals.
- Make sure viewing is undertaken by the DSL (or equivalent) or another member of the safeguarding team with delegated authority from the Principal.
- Make sure viewing takes place with another member of staff present in the room, ideally the Principal or a member of the Safeguarding Team. This staff member does not need to view the images.
- Wherever possible, make sure viewing takes place on the school premises, ideally in the Principal's office or a member of the SLT's office.
- Make sure, wherever possible, that they are viewed by a staff member of the same sex as the student in the images.
- Record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions.

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

The DSL will make an immediate referral to police and/or children's social care 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 SEN)
- What the DSL knows about the images or videos 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 pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (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. The decision will be made and recorded in line with the procedures set out in this policy.

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 to establish the facts and assess the risks.
They will hold interviews with the pupils involved (if appropriate).
If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers
The DSL will inform parents/carers 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 pupil 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 schools safer schools' officer – Claire Annison and/or Charlotte Stephens.

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
Pupils will be taught about the issues surrounding the sharing of nudes and semi-nudes as part of occur PSHE. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- 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 and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils will 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 pupils

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 pupils 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 -
- Students and stakeholders are able to report confidentially any safeguarding concerns via Whisper - The Chalfonts Community College - Safeguarding
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils - Whisper is clearly promoted on our school website as well as on SG posters displayed around the school site. It is also regularly referred to through Year assemblies and through the PSHE curriculum.

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 school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school 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 school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 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, antisemitism, 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 pupils 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're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, and communications sent directly to them. We will also share clear procedures with them, so they know how to raise concerns about online safety.
- As part of the usual communication with parents, CCC will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor online use.
- CCC will also make it clear to parents what their children are being asked to do online for college.
- 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 will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' 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 4 key categories of risk (described above) from the school's IT systems.
- The use of personal electronic devices, including mobile phones and cameras, by staff and students is closely monitored by the College, in accordance with the staff Code of conduct Policy.
- Photographs and videos of students will be carefully planned before any activity with particular regard to consent and adhering to the College's Data Protection Policy. The DPO will oversee the planning of any events where photographs and videos will be taken.
- Where photographs and videos will involve students who are LAC, adopted students, or students for whom there are security concerns, the Principal will liaise with the DSL to determine the steps involved. The DSL will, in known cases of students who are LAC or who have been adopted, liaise with the students' social workers, carers or adoptive parents to assess the needs and risks associated with the students.
- Staff will report any concerns about students' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.
- 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 school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy

8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

CCC recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

CCC will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying/ & behaviour] policies.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

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 local authority children's social care team 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. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. 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 condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these pupils.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

11. Pupils with a social worker

Pupils 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 pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil'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, Morag Wall 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
- As part of their role, they 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

13. Pupils who are lesbian, gay, bisexual or gender questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

14. Complaints and concerns about school safeguarding policies

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 (Appendix 12).

Whistle-blowing

As employees are often the first to realise that there may be something wrong within the school, it is important that they feel able to express their concerns without fear of harassment or victimisation. The school has a whistle blowing policy that sets out procedure for dealing with concerns raised by employees which relate to suspected wrongdoing or dangers at work.

Allegations of child abuse against teachers and other staff and volunteers will be dealt with in accordance with Keeping Children Safe in Education statutory guidance for schools and colleges and the School's Allegations of Abuse against staff Policy.

15. Record-keeping

CCC will hold records in line with our records retention schedule.
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 readily 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 school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

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.

CCC currently operates both a paper and the online system of CPOMS to record all current SG concerns.

All paper files for current CCC students are kept locked securely in the DSL office and accessible only by the DSL. Paper files for past CCC students have been documented and archived and are kept in a locked room accessible by the DSL.

All paper SG files (for past and present students) shave been logged on to a google drive so there is an accurate and current list of students who have a paper SG file. This information that they have a paper SG is also then shown on their CPOMS file (if they have one). A log of paper files that are either archived or transferred to a new setting is also kept on a google document, so we are able to track where the paper files currently are.

In addition:

› Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks

16. Training

16.1 All staff

Staff members will undergo safeguarding and child protection training at induction, which will be continued on throughout the academic year on at least a half-termly and/or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy.
- The Anti-bullying Policy and procedures.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate).
- The Behaviour for Learning Policy.
- The Children Missing Education Policy,
- Appropriate child protection and safeguarding training, including online safety training.
- Information about the role and identity of the DSL and deputy DSL.

All staff members will also receive regular safeguarding and child protection updates as required,

but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep CLA and PLAC safe.
- CCE and CSE
- Updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.
The DSL and deputy DSL will undergo child protection and safeguarding training and update this training at least every two years. The DSL and deputy DSL will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

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

The Safeguarding Team, Heads of Year, pastoral support and the Senior Leadership Team (SLT), will be in the process of all being trained to Level 3; a commitment of the importance we here at CCC place on Safeguarding. Members of the SLT and all pastoral leaders will also be required to undertake child protection and safeguarding training every three years (Level 3).

As a minimum, all CCC staff are trained to level 1 safeguarding: attending an annual update training session each academic year. All staff members will undertake safeguarding and child protection training including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse or neglect. Staff will also receive continual professional development on safeguarding topics throughout each academic year, using a variety of different methods (for example, face to face, the use of the SSSQ app and in house speakers). Safeguarding training is also delivered to governors by the DSL.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- 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.
Volunteers will receive appropriate training, if applicable.

16.2 The DSL and Deputy DSL

The DSL and Deputy DSL will undertake child protection and safeguarding training at least every 2 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, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

16.3 Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

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.

16.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of 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.

16.5 Staff who have contact with pupils and families

Staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

17. Monitoring arrangements

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

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy is August 2025.

18. Links with other policies

This policy operates in conjunction with the following school policies:

- Children Missing Education (CME) Policy
- Child Sexual Exploitation (CSE) Policy
- Prevent Policy
- Child-on-Child Abuse Policy
- Anti-Bullying Policy
- E-Safety and Online Safety Policy
- Data Protection Policy
- CLA & PLAC Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy
- Staff Code of Conduct
- Behaviour Policy

Safer Recruitment

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

Appendix 1: Types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 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 cyber-bullying), 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 caregivers)

- 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: Specific Safeguarding issues

This appendix sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues. The issues covered are:

Sexualy motivated incidents

Financially motivated incidents
1. Domestic abuse
2. Homelessness
3. Children absent from education
4. Admissions register
5. Child abduction and community safety incidents
6. Child criminal exploitation (CCE)
7. County Lines
8. Cyber-crime
9. Child sexual exploitation (CSE)
10. Modern slavery
11. FGM
12. Forced marriage
13. Radicalisation
14. Pupils with family members in prison
15. Pupils required to give evidence in court
16. Mental health
17. Serious violence
18. Child on Child Abuse
19. Serious violence and sexual harassment in schools
20. Identity checks and visitors
21. Contact details for organisations

Assessing adult-involved nude and semi-nude sharing incidents This section is based on annex A of the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude

or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

Contacted by an online account that they do not know but appears to be another child or young person

Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images

Moved from a public to a private/E2EE platform

Coerced/pressured into doing sexual things, including creating nudes and semi-nudes

Offered something of value such as money or gaming credits

Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them

Use images that have been stolen from the child or young person taken through hacking their account

Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person

Quickly engaged in sexually explicit communications which may include the offender sharing an image first

Moved from a public to a private/E2EE platform

Pressured into taking nudes or semi-nudes

Told they have been hacked and they have access to their images, personal information and contacts

Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

1. Domestic abuse

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

- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other. ·

Each have, or had, a parental relationship towards the same child.

- Are relatives.

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 (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

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. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

Domestic abuse can take many fs and can include a pattern of threatening behaviour; coercive behavior; control, violence or abuse by one person against another in a home or family setting, but is not limited to:

Physical - Assault, punching, kicking, hitting, forced imprisonment, biting, strangling, burning, dragging, using weapons, throwing objects

Sexual - Rape, sexual assault, forced prostitution, degradation, using objects, forced to watch or act in pornography

Psychological - Verbal or emotional abuse, threats to kill, blaming, mind games, criticism,

accusations, jealousy and obsessive behaviours, manipulation, sleep deprivation **Financial** - Preventing a person from getting or keeping a job, taking money, not permitting access to or withholding family income

Isolation - Not being allowed to see others, to see who you want, denied any form of contact with family or friends and any other support networks

The following behavioural signs may or may not be indications that domestic abuse has taken place; but the possibility should be considered

- Physical injury
- Withdrawal
- Insecure / fear
- Self-harm
- Eating difficulties
- Low self esteem
- Poor social skills
- Difficulties in trusting others
- Sadness / depression
- Aggressive to others
- Feelings of guilt
- Protective of mother / siblings
- Weight loss
- Truanting / running away
- Secretive / silent
- Self-blame / bitterness
- Ability to negotiate difficult situations
- Developmental delays

CCC recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. Using the information sharing from Operation Encompass, CCC will be able to monitor (and support if and when needed) those students that have been present in the family home when domestic abuse has happened As a College, we are mindful of the impact that exposure to domestic abuse has upon the victim(s) and the subsequent actions that may result (ie. moving out of the family home and the safety plans that may be needed to put in place). As with other types of abuse, all staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

2. Homelessness

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

The DSL will be aware of contact details and referral routes into 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.

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

- Household debt.

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

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

3.Children absent from education

A child being absent 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 be absent or 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 are absent 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 school 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 monitor pupils that go missing from the school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing Education Policy. CCC will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

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 absent, 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 team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

3. Admissions register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the College, or when the College has been notified that the pupil will first be attending. The College will notify the LA within 5 days of when a pupil's name is added to the admissions register.

CCC will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each pupil where possible. Staff will monitor pupils who do not attend the College on the agreed date and will notify the LA at the earliest opportunity.
If a parent notifies the College that their child will live at a different address, CCC will record the following information on the admissions register:

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

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

- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school Where a pupil moves to a new school, CCC will use a secure internet system to securely transfer pupils' data.
- To ensure accurate data is collected to allow effective safeguarding, the College will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:
- Have been taken out of CCC by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend CCC, and no longer live within a reasonable distance of the premises.
- Have been certified by the College's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the College does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

CCC will also remove a student from the admissions register where we and the LA have been unable to establish the student's whereabouts after making reasonable enquiries into their attendance.
If a student is to be removed from the admissions register, we will provide the LA with the following information:

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

- The full name and address of the parent with whom the student is going to live, and the date that the student will start living there, if applicable
- The name of the student's new school and the student's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Student Registration) (England) Regulations 2006 (as amended) CCC will work with the LA to establish methods of making returns for students back into the school. We will highlight to the LA where we have been unable to obtain necessary information from parents, e.g. where an address is unknown and we will also highlight any other necessary contextual information, including safeguarding concerns.
- If a parent notifies the College that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:
  The name of the new school
- The date on which the student first attended, or is due to attend, that school
  Where a student moves to a new school, the College will use a secure internet system to securely transfer students' data.
- To ensure accurate data is collected to allow effective safeguarding, the College will inform the LA of any student who is going to be deleted from the admission register, in accordance with the Education (Student Registration) (England) Regulations 2006 (as amended), where they:
- Have been taken out of the College by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the College, and no longer live within a reasonable distance of the premises.
- Have been certified by the College's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the student continuing to attend CCC after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and CCC does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

5. Child abduction and community safety incidents

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

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

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

6. Child criminal exploitation (CCE)

For the purposes of this policy, **"child criminal exploitation" (CCE)** is defined as 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.

CCC recognises that students involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. We also recognise that students of any sex are at risk of CCE.

7. County Lines

For the purposes of this policy, **"county lines"** refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.
As well as the general indicators for CCE, College staff will be aware of the specific indicators that a student may be involved in county lines, including:

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

Staff will be made aware of students with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a student may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL. The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

8. Cyber-crime

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

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

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

9. Child sexual exploitation (CSE)

Child sexual exploitation

For the purposes of this policy, **"child sexual exploitation"** is defined as 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.

CCC recognises that 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.

We recognise that CSE can affect any student who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes students aged 16 and above who can legally consent to sexual activity. 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

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

- Appearing with unexplained gifts, money or new possessions.

- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.
- Displaying sexual behaviours beyond expected sexual development.
- ●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 and the police, if appropriate. The LA and all other necessary authorities will then handle the matter to conclusion. The College will cooperate as needed.
All concerns related to CSE will be managed in line with the school's Child Sexual Exploitation (CSE) Policy.

10. Modern slavery

For the purposes of this policy, **"modern slavery"** encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.
All staff will be aware of and alert to the signs that a student may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

11. FGM

For the purposes of this policy, **"FGM"** is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences. All staff will be alert to the possibility of a student being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The College's procedures relating to managing cases of FGM and protecting students will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of The Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a student under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine students, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

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

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 pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil 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 pupil 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/carers 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.

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

12. Forced marriage

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.

Forcing a person into marriage is a crime.

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

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

All staff will be alert to the indicators that a student is at risk of, or has undergone, forced marriage, including, but not limited to, the student:
Being absent from Co
llege – particularly where this is persistent.

- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at College.
- Demonstrating a decline in behaviour, engagement, performance, exam results or

punctuality.
- Being withdrawn from College by their parents.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.
- Becoming anxious, depressed and emotionally withdrawn with low self-esteem.
- Displaying a decline in punctuality.
- An obvious family history of older siblings leaving education early and marrying early.

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

The DSL or Principal will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.
Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the College will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis. Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups. Local child safeguarding procedures will be activated following concerns regarding forced marriage – the College will use existing national and local protocols for multi-agency liaison with police and children's social care.

CCC will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The College will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

The College will aim to create an open environment where pupils feel comfortable and safe to discuss the

problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

CCC will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the College's RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated through CPD about the issues surrounding forced marriage and the signs to look out for.

The DSL will:

- Speak to the pupil 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 fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

13. Radicalisation

Preventing radicalisation

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

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

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

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

Protecting children from the risk of radicalisation is part of the College's wider safeguarding duties. CCC seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo

Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal rights movements.

The College will actively assess the risk of students being drawn into terrorism. Staff will be alert to changes in students' behaviour which could indicate that they may be in need of help or protection. Staff will use their professional judgement to identify students who may be at risk of radicalisation and act appropriately, which may include making a referral to the Channel programme. The College will work with local safeguarding arrangements as appropriate. The College will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, CCC will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with a child's parents, unless the College has reason to believe that the child would be placed at risk as a result.

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

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

We will assess the risk of children in our school 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 pupils to stay safe online at school and at home.

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

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil 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 pupil, 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.

Making a Judgement

When making a judgement, staff will ask themselves the following questions:

- Does the student have access to extremist influences?
- Does the student access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting such groups covertly using Skype)?
- Is there a reason to believe that the student has been, or is likely to be, involved with extremist organisations?
- Is the student known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- Does the student sympathise with or support illegal/illicit groups?
- Does the student support groups with links to extremist activity?
- Has the student encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the student?
- Have international events in areas of conflict and civil unrest had a noticeable impact on the student?
- Has there been a significant shift in the student's outward appearance that suggests a new social, political or religious influence?
- Has the student come into conflict with family over religious beliefs, lifestyle or dress choices?
- Does the student vocally support terrorist attacks, either verbally or in their written work?
- Has the student witnessed or been the victim of racial or religious hate crimes?
- Is there a pattern of regular or extended travel within the UK?
- Has the student travelled for extended periods of time to international locations?
- Has the student employed any methods to disguise their identity?
- Does the student have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the student display a lack of affinity or understanding for others?
- Is the student the victim of social isolation?
- Does the student demonstrate a simplistic or flawed understanding of religion or politics?
- Is the student a foreign national or refugee, or awaiting a decision on their/their family's immigration status?

- Does the student have insecure, conflicted or absent family relationships?
- Has the student experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other person in the student's life has extremist views or sympathies?
-

Critical indicators include where the student is:

- In contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites.
- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Making significant changes to their appearance and/or behaviour.

Any member of staff who identifies such concerns, because of observed behaviour or reports of conversations, will report these to the DSL. The DSL will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made; however, concerns are most likely to require a police investigation as part of the Channel programme, in the first instance.

The Prevent Duty

Under section 26 of the Counterterrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as **"the Prevent duty"**. The Prevent duty will form part of the College's wider safeguarding obligations.

The College's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outlined in the Prevent strategy.

Channel Programme

Safeguarding children is a key role for both the College and the LA, which is implemented through the use of the Channel programme. This service shall be used where a vulnerable student is at risk of being involved in terrorist activities. In cases where the school believes a student is potentially at serious risk of being radicalised, the DSL will contact the Channel programme.

The DSL will also support any staff making referrals to the Channel programme. The Channel programme ensures that vulnerable children and adults of any faith, ethnicity or background, receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.

The programme identifies individuals at risk, assesses the extent of that risk, and develops the most appropriate support plan for the individuals concerned, with multi-agency cooperation and support from the College.

The delivery of the Channel programme may often overlap with the implementation of the LA's or College's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from CSCS, or where the individual is already known to CSCS. The College

will keep in mind that an individual's engagement with the Channel programme is voluntary at all stages.

Risk Reduction
The College governors, the Principal and the DSL will assess the level of risk within the College and put actions in place to reduce that risk. Risk assessments will include consideration of the College's REP, and PSHE curriculum, SEND policy, the use of College premises by external agencies, integration of students by sex and SEN, anti-bullying policy and other issues specific to the College's profile, community and philosophy.

Building Children's Resilience
CCC will:

- Provide a safe environment for debating controversial issues.
- Promote fundamental British values, alongside students' spiritual, moral, social and cultural development.
- Allow students time to explore sensitive and controversial issues.
- Provide students with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing.
- Equip students to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments.
- Teach students about how democracy, government and law making/enforcement occur.
- Teach students about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK.

Resources

The College will utilise the following resources when preventing radicalisation:

- Local safeguarding arrangements
- Local police (contacted via 101 for non-emergencies)
- The DfE's dedicated helpline (020 7340 7264)
- The Channel awareness programme
- https://educateagainsthate.com
- https://actearly.uk/

14. Students with family members in prison

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

15. Students required to give evidence in court

Students required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support. Students will be provided with the booklet 'Going to Court and being a witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

16. Mental health

Staff who have a mental health concern about a student that is also a safeguarding concern will act in line with this policy and speak to the DSL. The College has designated the DSL to be the Mental Health Lead for students.
All staff will be made aware that mental health problems can, in some cases, be an indicator that a student has suffered, or is at risk of suffering, abuse, neglect or exploitation.

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

The College will access a range of advice to help them identify students in need of additional mental health support, including working with parents, the College's own counselling team, and external agencies and where necessary placing referrals to the local CAMHS (and FCAMHS) services. In all cases of mental health difficulties, the College's Social, Emotional and Mental Health (SEMH) Policy will be consulted and adhered to at all times.

17. 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.

18. Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously between the 2.
Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.
Child-on-child 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 children (this is sometimes known as 'teenage relationship abuse')
- 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 nude and semi-nude 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 child-on-child 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, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

19 Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 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 any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt

- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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. Section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

20. 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 electronically sign in and wear a visitor's badge.
Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, 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 appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

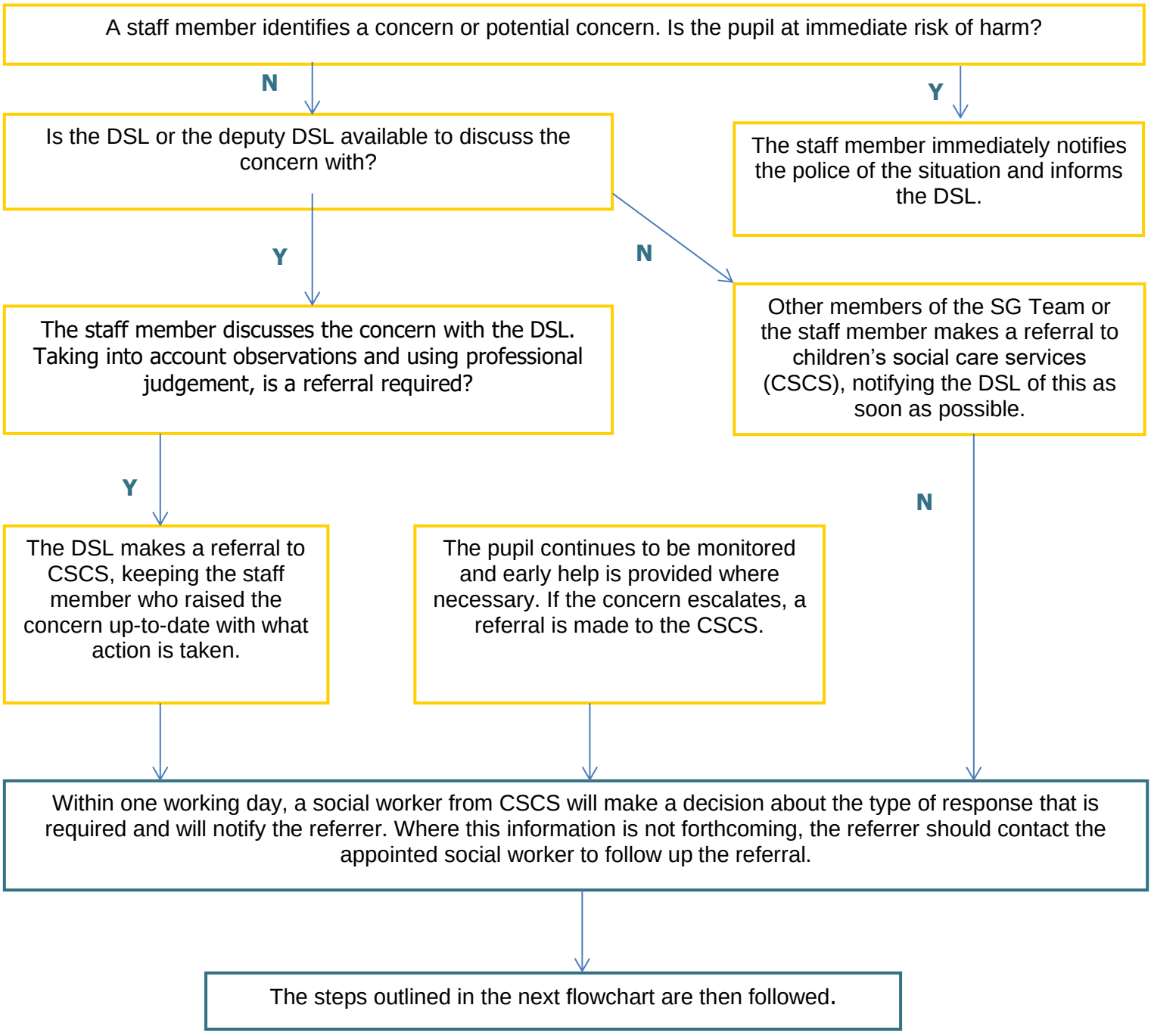
All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities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

Appendix 3: Safeguarding Reporting Process

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

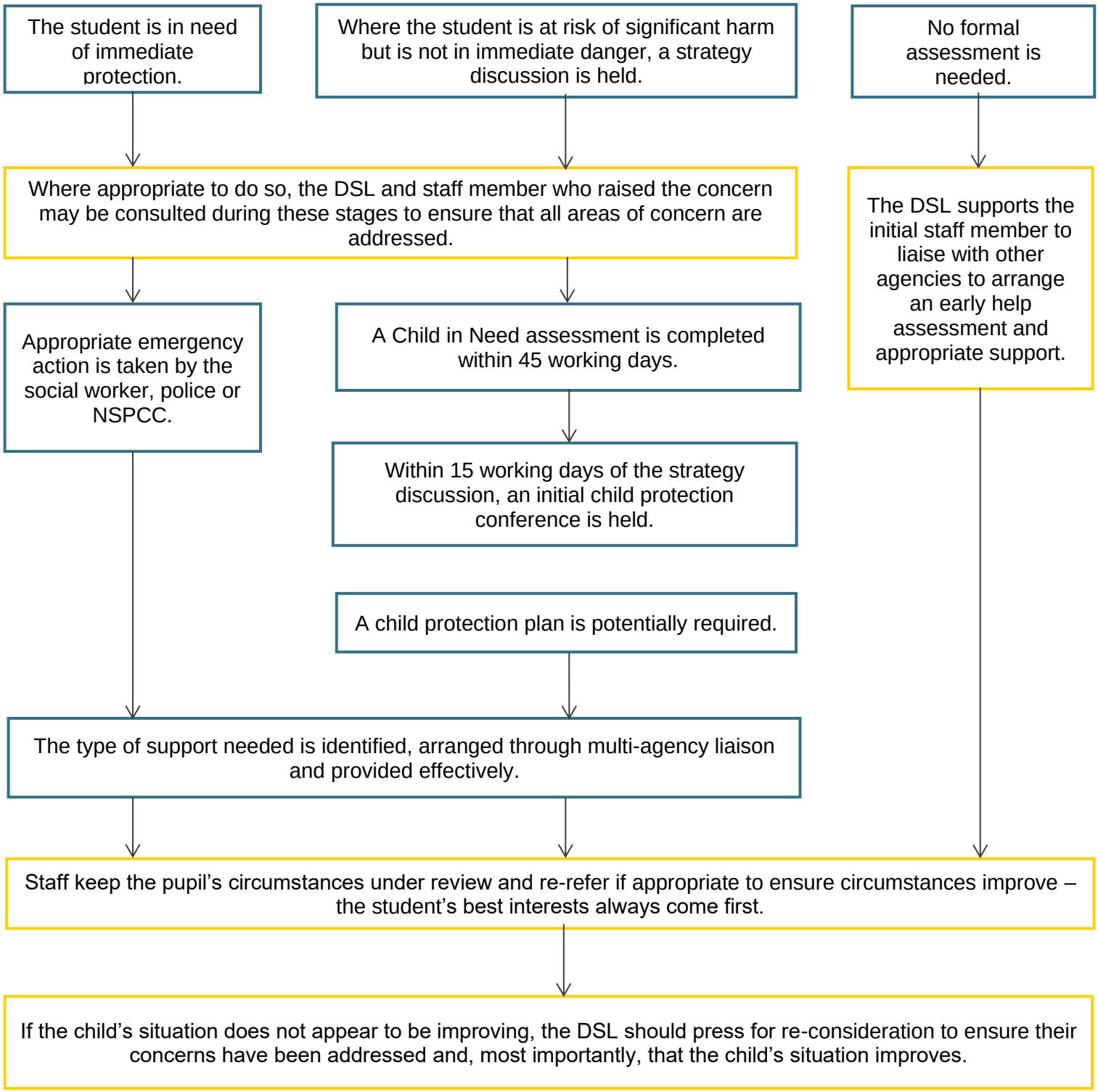
The actions taken by the school are outlined in yellow, whereas actions taken by another agency are outlined in blue.

Before a referral is made



After a referral is made

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



Appendix 4: Risk Assessment for Sexual Abuse/ Harmful Sexual Behaviour

The terms victim and alleged perpetrator are used to identify the children involved. NB: there should be no assumption of guilt on the part of the alleged perpetrator, pending investigation.

Each section/question will be considered from the perspective of both students. Considerations will be given for the impact on, and needs of, the wider school community. All concerns and proposed actions will be recorded.

The College will work with the local multi-agency safeguarding hub (MASH) and other agencies as necessary when completing this risk assessment. This document should be reviewed frequently to ensure it is fit for purpose.

*****A risk assessment should be completed for all cases relating to sexual violence or alleged sexual violence. Sexual violence is defined by the sexual offences act 2002 as "criminal acts: rape, assault by penetration and sexual assault".
*This risk assessment should be completed with reference to Keeping Children Safe In Education, DFE Sexual Violence and the London Child Protection Procedures and Practice Guidance (safeguarding sexually active children). https://www.londoncp.co.uk/index.html

considerations	RISK (consider victim, alleged perpetrator, other students and staff)	Risk Level (High, Medium or low)	actions to reduce risk	Revised Risk Level (High, Medium or low)
What was the nature of the incident?				
Was it a crime?				
Is it necessary to limit contact between the children involved? Refer to KCSiE and DFE guidance on sexual harassment and sexual violence in schools and colleges.				

Is there an actual or perceived threat from the alleged perpetrator to the victim and/or others?				
Is either the victim or the alleged perpetrator at risk of physical harm as a result of this incident (for example, bullying or 'retribution' by peers)?				
Do they share classes?				
Do they share break times?				
Do they share transport to/from school?				
Are they likely to come into contact with each other (or anyone else involved in/with knowledge of the incident) outside of school?				
How can such contact be limited?				
Is there a risk of harm from social media and gossip?				

Further action taken by the school:

Action	YES/NO	Date
Police informed		
Referral to MASH		
Referral to external support services		
Referral to internal support services		
Referral to CAMHS		
Referral to early help		
Other		

Appendix 5: Peer on Peer Protocol

Protocol for dealing with conflict situations between students with police involvement

This is an internal protocol that has been adopted by the school to deal with situations that are of asensitive nature. It is not a school policy document and is used as a guideline to senior staff who deal with such matters.

	Action	**Who**	**When**
1	Agree two separate pairs of staff to deal with each side/group of students	Staff team 1 lead Staff team 1 support Staff team 2 lead Staff team 2 support	To be completed immediately
2	Agree a third party to deal with outside agencies / seek advice / deal with ongoing issues		To be completed immediately
3	Each team to set up a spreadsheet to record information (Appendix 1)	Staff team 1 lead Staff team 2 lead	To be completed immediately
4	Meet with parents to agree the initial draft of the risk assessment (Appendix 2) and to complete points 5,6,7,8 As part of the risk assessment include plans for school trips and non-curriculum days. These are to be discussed prior to the event and strategies implemented. Parents and students are to notify lead staff of known school trips. If necessary, separate risk assessments and agreements are to be completed prior to the event in conjunction with the trip leader. Set the date to review the risk assessment (point 9)	Staff team 1 lead Staff team 1 support Staff team 2 lead Staff team 2 support	Date completed Date completed
5	Agree a member of staff each student(s) will see if issues arise and how/when they can see them (Team support). This person must complete a log of meetings (Appendix 3)	Staff team 1 Staff team 2	Date completed Date completed

6	Offer internal support, e.g. Transform (must be different mentors), or external counsellor	Staff team 1 Staff team 2	Date completed Date completed
7	Agree when students will be seen if staff need to speak to them, e.g. they should not just be taken from a lesson unexpectedly and inform them before and/or afterwards depending on the circumstances	Staff team 1 Staff team 2	Date completed Date completed
8.	Students to sign an agreement		
8	Review risk assessment with other pair of staff to ensure a consistent approach		Date completed
9	Meeting with parents to agree risk assessments and agree review meeting	Staff team 1 Staff team 2	Date completed Date completed
10	Agree review meetings with parents	Staff team 1 Staff team 2	Date completed Date completed

Appendix 6: Individual Student Risk Assessment

Student's Name:	Assessor's Name:	Date:	Review Date

BEHAVIOUR	WHEN?	MOST AT RISK	HOW LIKELY?	X	HOW OFTEN?	X	POTENTIAL HARM	=	RISK FACTOR	ACTION
(Circle or underline those which apply) NB – In cases where a student is suspected or found to be carrying a weapon, action should always be taken, regardless of the apparent likelihood of harm.	*Time of day; potential triggers etc.*	*Who is most likely to be harmed and how?*	*5=Certain* *4=Probable* *3=Possible* *2=Not impossible* *1=Never*		*5=Daily* *4=Weekly* *3=Monthly* *2=Rarely* *1=Never*		*(Include an assessment of the likely physical <u>and</u> psychological harm)* *4= Life-threatening* *3=Serious* *2=Harm* *1=No harm*		*Approximate percentage chance of harm occurring:* *100%=certain* *>50%=probable* *>9%=possible* *>1%=not impossible* *1%=never*	

What health and safety hazards arise or could arise in respect of this student?	
What risks do they pose and to whom?	LEVEL OF RISK: High/Medium/Low
What has been done so far to remove or reduce the risks?	REMAINING RISK: High/Medium/Low
What further action is required to reduce the risk further? *EXTERNAL AGENCIES*	LEVEL OF RISK ONCE ALL CONTROL MEASURES ARE IN PLACE (High/Medium/Low):
	Medium
List any activities which <u>cannot</u> be safely managed, as far as it is possible to foresee.	

Signed …… (Student) Date ……

Signed …… (Parent) Date ……

Appendix 7: Written agreement following Student Risk Assessment

The Chalfonts Community College

AGREEMENT

I agree not to make direct or indirect contact with <NAME> by any means.

This includes:

- when travelling to and from school
- in the vicinity of the school
- during the school day
- entering a classroom where the other student is present
- loitering in the vicinity of the other student
- posting or commenting on social media
- commenting or responding to others regarding the issue.

Whilst the school accepts that passing in the corridors may be unavoidable at times, all students are expected to move directly to their appointed lessons by the most direct route without delay or diversion.

I understand that should I be present in the vicinity of the other student without good reason or staff permission, this could be perceived as intimidation and will be sanctioned by the school.

I also understand that in order for me to be safeguarded from allegations, I should not take part in any conversations associated with the person or related to the incident, including social media comments.

I agree to report any concerns I have immediately to <NAMED PERSON>; this includes reporting any actions by others that I may be held accountable, e.g. comments posted by others on social media relating to the issue.

I understand that this is the school's usual practice pending an outcome where there are unresolved high-level issues. This does not in any way confer blame but is to ensure the wellbeing of all parties involved.

Signed …… (Student) Date……

(Print name) ……..

Witnessed by …….. (Parent) Date……

Witnessed by …….. (School) Date……

Appendix 8: Physical Restraint Form

Serious Incident Record	**No:**
Name of person completing this report:	
Name of Young Person:	
Location of Incident:	**Date:**
Full Names of Staff Involved:	

Start Time of serious Incident:	**Duration of any Restraint:**	**Any Injuries**	**Medical Check:**	**Incident reviewed with Young person:**
Hr Mins	Mins	Child Other	Offered Accepted	Offered Accepted

Nature of Risk	**External Agencies Informed**	**Supporting Records Completed**
Injury to person Damage to property Criminal Offence Serious Disruption Absconding	Medical Staff Parent/Guardian Social Worker Placing Authority Police	Bound Book Accident Report Medical Report RIDDOR Formal Statement

Environments and Triggers:
Describe what was happening and what led up to a dangerous situation:

Circle the level of potential risk.
Low Medium High

Circle and/or describe precisely what the risk was.
Verbal abuse Slap Punch Bite Pinch Spit Kick Hair Grab Neck grab Clothing grab Body holds Arm grab Weapons/Missiles Other:

Who was at risk?

Controling Risk
Describe any changes you made to routines, personnel or the environment in an attempt to reduce the risk of this happening.

DIVERSION, DISTRACTIONS AND DEESCALATION ATTEMPTED

Verbal advice and support Firm clear directions Negotiation Limited Choices

Distraction Diversion Reassurance Planned Ignoring Contingent Touch C.A.L.M. talking/stance Take up Time Withdrawal Offered Withdrawal Directed Transfer Adult Reminders about Consequences Humour Success Reminders

Other:

PHYSICAL INTERVENTION STRATEGIES ATTEMPTED

Help Hug Cradle Hug Wrap Sitting Wrap Double Elbow Half Shield Sitting Double Elbow (Single Person) Single Elbow (Two person)
Sitting Single Elbow (Two person) Figure of Four (Two person)

Other:

Signed:

Dated:

Comment:

Signed:

Appendix 9: Disqualification Declaration

Chalfont Community College:	
Name of staff member:	Position:

Orders and other restrictions	**Yes/No**
Have any orders or other determinations related to childcare been made in respect of you?	
Have any orders or other determinations related to childcare been made in respect of a child in your care?	
Have any orders or other determinations been made which prevent you from being registered in relation to childcare, children's homes or fostering?	
Are there any other relevant orders, restrictions or prohibitions in respect of you as set out in Schedule 1 of the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018?	
Are you barred from working with children by the DBS?	
Are you prohibited from teaching?	
Specified and statutory offences	
Have you ever been cautioned, reprimanded, given a warning for or convicted of:	
• Any offence against or involving a child?	
• Any violent or sexual offence against an adult?	
• Any offence under The Sexual Offences Act 2003?	
• Any other relevant offence?	
Have you ever been cautioned, reprimanded for or convicted of a similar offence in another country?	
Provision of information	
If you have answered yes to any of the questions above, provide details below. You may provide this information separately, but you must do so without delay.	
Details of the order restriction, conviction or caution:	

The date(s) of the above:	
The relevant court(s) or body/bodies):	
You should also provide a copy of the relevant order, caution, conviction, etc. In relation to cautions and/or convictions, a DBS certificate may be provided.	
Declaration	
In signing this form, I confirm that the information provided is true to the best of my knowledge and that: ● I understand my responsibilities to safeguard children. ● I understand that I must notify the Principal immediately of anything that affects my suitability to work within the school. This includes any cautions, warnings, convictions, orders or other determinations made in respect of me that would render me disqualified from working with children.	
Signed:	
Print name:	
Date:	

Appendix 10: Protocol for Passing Information to The Police

Chalfont Community College works in conjunction with students, parents and guardians, and the police to ensure a safe environment for both students and members of the community. The school will co-operate with requests for information, including contact details, from the police and will, under certain circumstances, report incidents to the police.

An electronic record (uploaded onto CPOMS) will be kept of information passed to the police.

1. The school may pass information to the police, including requesting police to attend school under the following circumstances:

    - Theft of school property
    - Vandalism to school property
    - Reasonable suspicion of criminal activity on school property (including possession, dealing or brokering of illegal or prohibited items or stolen property)
    - Information which arises from a school investigation relating to, or knowledge of, criminal or anti-social behaviour not on the school site.
    - Threatening or abusive behaviour towards school staff or students on the school premises by parents or guardians
    - Discovery of prohibited items following deployment of the police screening arch, or similar initiative, by the school
    - When the Principal deems that it would be beneficial to the good management of the school or safety of members of the school community for a police officer to speak to a student.

2. The school may pass information at the request of the police. It may not be appropriate for the school to seek permission from parents or guardians beforehand, as this may prevent effective investigation by the police, result in collusion or evidence being destroyed prior to police investigation, In the case of sensitive issues, police will undertake to inform the Principal or Designated Safeguarding Lead (DSL) in confidence of the reason for the request, if practical. Information may be passed under the following circumstances:

    - To investigate an assault which takes place
    - To investigate theft
    - To assist in the detection of criminal or anti-social activities, including passing contact details for potential witnesses and suspects
    - Where police make the school aware of other reasonable round to require information.

3. The school may request a meeting between students and the Safer Schools Officer in the following circumstances:

    - Racist or homophobic incidents
    - Inappropriate use of IT or social media, either on the school premises or having an impact in school
    - School investigation into use of drugs or alcohol, or theft by students
    - Anti-social behaviour by students on the way to or from school, or on school property · Bring dangerous, inappropriate items or items banned under the school rules onto the premises, eg. Lasers, shisha pens or similar
    - To facilitate restorative meetings at the school's request. These may also be initiated by the police as an alternative to prosecution where this has been agreed by parties involved.
    - Consent from parents or guardians is not necessary in order for the meeting to take place;

however, the school will ensure that a designated member of staff is present to support students during the meeting. Parents or guardians will be informed by police or school if such a meeting takes place.

4. CCTV

The school may allow police to view CCTV images as part of their investigation into reported incidents and may pass a copy of CCTV images of an incident to the police in line with the guidelines issued by the Information Commissioners Office.

5. Mobile Phones

A student's mobile phone may be seized for staff to hand to police should it be found to have inappropriate/unlawful items on it.

Appendix 11: Contacts and Advice

NSPCC	0800 800 5000 www.nspcc.org.uk
Childline	0800 11 11 www.childline.org.uk
Kidscape – Parent Advice Line (bullying) (Mon-Weds from 9:30am to 2:30pm)	020 7823 5430 www.kidscape.org.uk
Female Genital Mutilation Helpline (NSPCC)	0800 028 3550 fgmhelp@nspcc.org.uk
Samaritans – Helpline	116 123 www.samaritans.org
Forced Marriages Unit - Foreign and Commonwealth Office	020 7008 0151 fmu@fco.gov.uk
Crimestoppers Independent UK charity taking crime information anonymously | Crimestoppers (crimestoppers-uk.org)	0800 555 111
R-U Safe? Barnardos - Children/Young People Sexual Exploitation Service www.barnardos.org.uk/rusafebucks	01494 785 552
CEOP (Child Exploitation and Online Protection) www.ceop.police.uk/	

Barnardo's
Lucy Faithfull Foundation
NSPCC
Rape Crisis
University of Bedfordshire: Contextual Safeguarding
UK Safer Internet Centre

Support for Victims
Anti-Bullying Alliance
MoJ Victim Support
Rape Crisis
The Survivor's Trust

Victim Support

Toolkits
Brook
NSPCC
Safeguarding Unit, Farrer and Co, and Carlene Firmin, MBE, University of Bedfordshire

Further Information on Confidentiality and Information Sharing Gillick Competency Fraser Guidelines
Government Information Sharing Advice
Information Commissioner's Office: Education
NSPCC: Things to Know and Consider

Further Information on Sexting
UK Council for Child Internet Safety: Sexting Advice
London Grid for Learning – Collection of Advice

Support for Parents
Parentzone
Parentsafe – London Grid for Learning
CEOP Thinkuknow – Challenging Harmful Sexual Attitudes and their Impact CEOP Thinkuknow – Supporting Positive Sexual Behaviour

Appendix 12: Allegations of Abuse Policy 2024 - 2025

1. Scope of this policy

NB. "Child" refers to anyone under the age of 18.

This policy covers the process for dealing with allegations that meet the harms threshold, which are allegations where it is alleged that anyone working in the school, including supply teachers, volunteers, and contractors, has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including transferable risk, i.e. behaviour that may have happened outside of school that might make the individual unsuitable to work with children.

Procedures for managing allegations that do not meet the harms threshold (also known as 'low-level concerns') are not covered in this policy. The school's Low-level Safeguarding Concerns Policy outlines the procedures for dealing with allegations that do not meet the harms threshold.
Low-level concerns will not be viewed as insignificant, but as any concerns that do not meet the harms threshold set out above. A low-level concern is any concern that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work.
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LA designated officer (LADO).

If the school has any doubt as to whether information which has been shared about a member of staff as a low-level concern meets the harm threshold, the LADO's advice will be consulted.

For the purpose of this policy **"allegation"** refers to allegations that meet the harms threshold.

2. Staff covered by this policy

This policy covers allegations against those working in or on behalf of CCC in a paid or unpaid capacity, including members of staff, supply teachers, volunteers and contractors.

In some cases, the school will have to deal with an allegation against an individual not directly employed by them, e.g. supply staff provided by an employment agency, where the school's disciplinary procedures do not fully apply because agencies will have their own procedures.

In these cases, the school will ensure allegations are dealt with properly and will often take the lead on dealing with the allegation as it has access to all of the necessary information. Under no circumstances will the school decide to cease to use a supply teacher due to safeguarding concerns without finding out the facts and liaising with LADO to determine a suitable outcome.

Any supply agencies used by the school will be informed of the school's process for managing allegations. The school will also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers.

If an allegation is made against a governor, the school will follow its local procedures. Where an allegation is substantiated, the school will follow the procedures to consider removing the governor from office.

For the purposes of this policy **"member of staff"** refers to staff, supply staff, volunteers and contractors.

3. Role and responsibilities

The governing board will be responsible for:

- Ensuring this policy is implemented consistently in the school.
- Ensuring welfare support is put in place for staff subject to allegations.
- Making the final decision of whether a member of staff subject to an allegation should be suspended.

The chair of governors will be responsible for acting as the case manager for allegations relating to the principal.

The principal will be responsible for delegating the role of the case manager for allegations to either the DSL and / or the Vice Principals, unless the allegation relates to them or there would be a conflict of interest if they were the case manager.

The case manager will be responsible for:

- Conducting a basic enquiry as soon as an allegation is reported.
- Leading investigations into allegations.
- Working with the LADO when dealing with allegations.

The DSL will also be responsible for:

- Making referrals to children's social care services (CSCS) and/or the police where necessary.
- Looking after the welfare of students involved in an allegation and ensuring they are not at risk.

The LADO will provide advice and guidance to the school when considering allegations. Their role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out.

4. Reporting concerns and allegations

Staff must report allegations without delay, in line with the following reporting lines:

- Allegations regarding another member of staff will be reported to the DSL and Principal
- Allegations regarding the principal will be reported to the Chair of Governors

Where there is a conflict of interest in reporting the allegation to the principal, staff will report the concern directly to the LADO. Information regarding the identity of the LADO can be found on the LA's website and on the staff noticeboard in the staffroom.

Where a student makes a disclosure to a member of staff about the behaviour of another member of staff, staff must follow the reporting lines above.

Once an allegation has been made, a case manager will be assigned to lead the investigation. The case manager will be delegated by the principal or, where the principal is the subject of an allegation, the chair of governors.

5. Initial response

CSCS and, as appropriate, the police will be contacted immediately if a child has been harmed, there is an immediate risk of harm to a child, or the situation is an emergency. These reports will be made in line with the school's Child Protection and Safeguarding Policy.

Before contacting the LADO, the case manager will conduct a basic enquiry in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation. During this basic enquiry, the case manager will ensure they collect any information that will be required by the LADO and will be careful not to jeopardise any potential future police investigation.

Once the case manager has conducted the basic enquiry, they will contact the LADO. The case manager and LADO will discuss the nature, content and context of the allegation and decide if:

- No further action is needed.
- A strategy discussion should take place.
- There should be involvement from the police and/or CSCS.

Where the case manager (DSL) is concerned about the welfare of other children in the community or the staff member's family, they will conduct a risk assessment of the situation. Where necessary, the DSL will make a referral to CSCS.

If the allegation is about physical contact, e.g. restraint, the strategy discussion or initial evaluation with the LADO will take into account that teachers and other staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Where the allegation includes behaviour outside of school, an assessment of transferable risk to children with whom the person works will be undertaken where appropriate; advice will be sought from the LADO where there is any doubt.

No further action

Where the initial assessment leads to no further action, the case manager and LADO will:

- Record the decision and justification for it.
- Agree on what information should be put in writing to the individual concerned and by whom.

Strategy discussion

If there is cause to suspect a child is suffering, or is likely to suffer, significant harm, a strategy discussion involving the police and/or CSCS will be convened. Strategy discussions will take place in line with the 'Working Together to Safeguarding Children' statutory guidance. For allegations regarding physical contact, e.g. restraint, the right to use reasonable force in line with the school's Physical Intervention Policy will be taken into account.

CSCS will convene the meeting to determine the child's welfare and plan rapid future action if there is reasonable cause to suspect the child is suffering or likely to suffer significant harm. A representative of the school (DSL) will usually be invited to the meeting.

The discussion will be used to:

- Share available information.
- Agree the conduct and timing of any criminal investigation.
- Decide whether enquires under section 47 of the Children Act 1989 must be undertaken.

Investigation

Where it is clear than an investigation by the police or CSCS is unnecessary, or the strategy discussion or initial assessment decides that this is the case, the LADO will discuss the next steps with the case manager (DSL)

Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager will discuss how the investigation will be undertaken and who should conduct the investigation. In most cases, the investigation will be undertaken by a senior member of staff at CCC (either the DSL or Vice Principals).

The case manager will monitor the progress of the investigation to ensure that it is dealt with thoroughly, fairly and as quickly as possible. The first review will take place no later than four weeks after the initial assessment where possible. Dates of subsequent reviews will be set at the review meeting if the investigation continues and will be conducted at least at fortnightly intervals.

Informing the member of staff

The decision of when to inform will be considered carefully on a case-by-case basis, considering guidance from the LADO as required and CSCS and the police if involved. The member of staff subject to an allegation should be informed of the allegation and given as much information as possible, unless there are good reasons not to. In cases where the allegation needs to be reported to CSCS and/or the police, the case manager will seek advice from the LADO, CSCS and police as appropriate regarding what information can be shared.

Supply staff

Where an allegation relates to a member of supply staff, the agency will be fully involved and cooperate with any enquiries from the school, LADO, police and/or CSCS. In these cases, the school will usually take the lead as the agency will not have direct access to the required information.

The school will not decide to stop using a member of supply staff due to safeguarding concerns without first finding out the facts and liaising with the LADO to determine a suitable outcome.

The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency or agencies are taken into account by the school during the investigation.

6. Confidentiality

The case manager and LADO will discuss what information will be shared and with whom, alongside which actions will be taken to manage any possible breaches of confidentiality or press interest.

Reporting restrictions under the Education Act 2011 will be observed. Information regarding an allegation will only be shared with necessary parties. Every effort will be made to protect the privacy of all parties involved in an allegation. Confidentiality will also be maintained to ensure a fair investigation can be undertaken.

All parties involved in an allegation will be made aware of the requirement to maintain confidentiality and guard against unwanted publicity about any allegations made against teachers whilst investigations are in progress.

In circumstances where the school needs to make parents aware about an allegation, it will ensure parents and others are aware that there are restrictions on publishing information.

Breaches in confidentiality will be taken seriously and may warrant a separate investigation.
The school will not provide the media with any information regarding an allegation.

7. Suspension

Suspension, e.g. remaining under the school's employment but being asked not to attend the school premises, will never be an automatic response when an allegation is reported – all options to avoid suspension will be considered prior to taking that decision.

The case manager (in liaison with the Principal) will undertake a Risk Assessment where they carefully consider whether the circumstances warrant suspension from contact with children at the school, or until the allegation is resolved. Suspension will be considered only in cases where there is cause to suspect a student or other student at the school is/are at risk of harm, or the case is so serious that it might be grounds for dismissal.

The case manager will seek advice from the school's HR provider (EPM) and the LADO, as well as the police and CSCS where they have been involved. The following options will be considered by the case manager before suspending a member of staff:

- Redeploying the member of staff within the school so that they do not have direct contact with the pupil or pupils concerned
- Providing an assistant to be present when the individual has contact with pupils
- Redeploying the member of staff to alternative work in the school so the individual does not have unsupervised access to pupils
- Moving the pupil or pupils to classes where they will not come into contact with the member of staff – this decision will only be made if it is in the best interests of the pupil or pupils involved and takes account of their views
- Temporarily redeploying the member of staff to another role in a different location, e.g. to an alternative school, where available
- Other reasonable adjustments as discussed by the case manager, Principal and EPM.

The Principal will make the final decision on whether the member of staff should be suspended. Where a strategy discussion, or initial assessment, concludes that there should be enquiries by CSCS, and/or an investigation by the police, the LADO will seek the views of the police and CSCS regarding whether the member of staff should be suspended from contact with children. Police involvement does not make it mandatory to suspend a member of staff. The decision to suspend will be made on a case-by-case basis following a risk assessment of whether the person poses a risk of harm to children.

If immediate suspension is considered necessary, the case manager will record the rationale and justification

for this decision, alongside the alternatives to suspension that were considered and why they were rejected.

Where suspension is deemed necessary, written confirmation will be given to the member of staff within one working day where possible, which will provide as much detail as appropriate for the reasons for the suspension. The member of staff will be told immediately who their named contact is within the school for the period of their suspension.

Where an allegation relates to a member of supply staff, the case manager (DSL) will discuss with the supply agency or agencies, whether it is appropriate to suspend the individual, or redeploy them to another part of the school, whilst an investigation is carried out.

Where the school is made aware that the Secretary of State has made an interim prohibition order, in respect of an individual who works at the school, immediate action will be taken by the school to ensure the individual does not carry out work in contravention of the order, i.e. not carrying out teaching work, pending the findings of the TRA investigation.

The following pay arrangements will be implemented while a member of staff is suspended, or an interim prohibition order is in place: Staff Policies

8. Supporting those involved

Students and parents

The welfare of the student(s) involved in an allegation will be paramount. Students involved will be fully supported in line with the Child Protection and Safeguarding Policy.

The parents of the student(s) involved in an allegation will be told about the allegation as soon as possible if they do not already know about it, unless notifying the parents would put the pupil at further risk. The case manager (DSL) will work with the LADO to agree who should be informed about the allegation.

Parents will be made aware of the requirement to maintain confidentiality and guard against unwanted publicity about any allegations made against teachers whilst investigations are in progress.

Parents will be kept informed about the progress of the allegation, including the outcome and any action taken.

Staff who report an allegation

The school will ensure that all staff feel equipped and supported to report any allegations or concerns. This will be part of staff's annual (as a minimum) Safeguarding training. Staff will also be reminded that they are able to self-report or share any concerns they may have about a colleague, they may have through the schools' anonymous disclosure system – WHISPER, as well being able to speak to the DSL, Vice-Principals or Principal.

Staff subject to an allegation

Any staff member subject to an allegation will be offered welfare support. The school has a duty of care to all staff and will:

- Manage and minimise the stress caused by the allegation.

- Inform the member of staff as soon as possible about the allegation, explaining the likely course of action, guided by the LADO, and the police where necessary.
- Advise the member of staff to contact their trade union representative, or a colleague for support.
- Appoint a named representative to keep the staff member informed about the progress of the case.
- Provide access to counselling or medical advice where appropriate.
- Not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Any information regarding an allegation is confidential and will not ordinarily be shared with other staff or with pupils or parents who are not directly involved in the investigation.

9. Outcomes

The following definitions will be used when determining the outcome of an allegation:

- **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 cause harm to the person 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
- **Unfounded**: There is no evidence or proper basis which supports the allegation being made

The options available to the school will depend on the nature and circumstances of the allegation and the evidence and information available.

10. Referral to the DBS

If an allegation is found to be substantiated and the member of staff is dismissed, resigns or otherwise ceases to provide their services to the school, or the school ceases to use the person's services, the school has a legal duty to make a referral to the DBS. For members of teaching staff at the school, the Principal and DSL will consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.
The school will also make a referral to the DBS where it is considered an individual has engaged in conduct that harmed, or is likely to harm, a child, or if they otherwise pose a risk of harm to a child.

11. Criminal investigations

Some allegations may result in a criminal investigation taking place. The police will inform the school and the LADO when:

- A criminal investigation and any subsequent trial is complete.
- It is decided to close an investigation without charge.
- It is decided not to continue to prosecute after the person has been charged.

The case manager and LADO will discuss whether any further action against the member of staff is appropriate, including disciplinary action.

12. Unsubstantiated, unfounded, false or malicious allegations

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the case manager will consider whether the student and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. If this is the case, the DSL will decide whether a referral to CSCS needs to be made.

If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it, in line with the Disciplinary Policy and Procedure (for staff reporters) or Behaviour Policy (for pupil reporters).

Following an allegation concluded to be either unfounded, false, malicious or unsubstantiated, the case manager, in liaison with the LADO if they were involved, will consider the facts and determine whether any lessons can be learnt and if improvements can be made to the school's procedures.

Where it is needed (and on a case by case basis) the DSL will liaise with the relevant external agencies as required (ie. LADO, Police, CSCS) following any malicious allegations that have been made against staff.

13. Returning to work

Where a member of staff has been suspended and it is decided on conclusion of the case that they can return to work, the case manager will decide on the best course of action to facilitate the return to work, seeking advice from the school's HR provider (EPM) and the LADO where necessary.

The individual's circumstances will be taken into account, and options such as a phased return and the provision of a mentor to provide assistance and support in the short term considered where appropriate.

The Principal and DSL will also consider how the staff member's contact with the child who made the allegation can best be managed if they are still attending the school.

The member of staff will be provided with support, including welfare support, during their return to work.

14. Resignations

If the member of staff leaves, resigns or ceases to provide their services during an investigation, the school will not stop the investigation and will ensure its completion.

The staff member subject to the allegation will be given a full opportunity to answer the allegation and make representations about it. The process of recording the allegation and supporting evidence and reaching a judgement on the allegation will continue even if the member of staff does not cooperate. The member of staff concerned will be notified of the conclusion of the allegation and sanctions that may be posed.

Settlement agreements

The school will not use settlement agreements (also known as compromise agreements) where there are allegations that indicate a person is a risk or poses a risk of harm to children or is deemed not suitable to work with children.

In limited circumstances, it may be appropriate to use settlement agreements to end the employment relationship on agreed terms. Where a settlement agreement is used, this will not prevent the school from:

- Fulfilling its legal duty to refer cases to the DBS where the referral criteria are met.
- Providing a fair, accurate and truthful reference that is not misleading to potential employers when requested.
- Considering whether to make a referral to the Teaching Regulation Agency (TRA) where the criteria are met.

15. Record keeping

Any details of allegations that are found to be malicious or false will be removed from the staff member's personnel record, unless they give their consent for the information to be retained.

For all other allegations, the following information will be kept on the staff member's personnel file:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Details of any action taken, decisions reached and the outcome
- A copy provided to the person concerned, where agreed by CSCS or the police
- A declaration on whether the information will be referred to in any future reference

The school will retain records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the enquiry. All other records will be retained until the staff member subject to the allegation has reached normal pension age or for a period of 10 years from the date of the allegation, whichever is longer.

All records will be managed in line with the school's Data Protection Policy.

16. References

References will be provided in line with the school's Safer Recruitment Policy.

The school will ensure that any information provided confirms whether they are satisfied with the applicant's suitability to work with children, and only provide the facts of any substantiated safeguarding concerns or allegations that meet the harm threshold within any employment references.

17. Non-recent allegations

If a former student makes an allegation to the school that they were abused as a child, they will be advised to report the allegation to the police. Non-recent allegations made by a student will be reported to the LADO in line with the LA's procedures for dealing with non-recent allegations.

All students and staff will be made aware that abuse can be reported no matter how long ago it happened.

18. Monitoring and review

Throughout the process in handling allegations and at conclusion of a case in which an allegation is substantiated, the LADO will review the circumstances of the case with the case manager to determine whether

there are any improvements to be made to the college's procedures to help prevent similar events in the future.

This policy will be reviewed annually by the Principal and governing board. Any changes to this policy will be communicated to all staff and other relevant stakeholders, e.g. supply agencies. The next scheduled review date for this policy is August 2025.

Appendix 13: Low Level Safeguarding Concerns Policy 2024 - 2025

Statement of intent

Chalfonts Community College and its staff understands the importance of acknowledging, recording and reporting all safeguarding concerns, regardless of their perceived severity. We understand that, while a concern may be low-level, a concern can escalate over time to become much more serious.

Our school prides itself on creating a safe and prosperous environment for students, and our staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding students. The school has clear professional boundaries which all staff are made aware of and will adhere to. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to our students and other children.

1. Definitions

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors,

For the purposes of this policy, a Low-Level Concern (LLC) is defined as any concern had about an adult's behaviour towards, or concerning, a child that does not meet the harms threshold Appendix 12) or is otherwise not serious enough to consider a referral at the time of its reporting.

A Low-Level Concern is any concern – no matter how small, and even if no more than causing a sense of unease or a "nagging doubt."

LLC refer to behaviour on the part of a staff member towards students that is considered inappropriate in line with statutory safeguarding advice, the Staff Code of Conduct, and the 'Appropriate and inappropriate behaviour' subsection of this policy.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- 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.

LLC are differentiated from concerns that can cause harm.

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school 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
-

- While LLC are, by their nature, less serious than concerns which meet the harms threshold, the school understands that many serious safeguarding concerns often begin with LLC, e.g. being overly friendly with children. The school will ensure that all staff are aware of the importance of recognising concerns before they have an opportunity to escalate from low-level to serious.

2. Roles and responsibilities

The governing board is responsible for:

- Ensuring that the school complies with its duties under child protection and safeguarding legislation.
- Ensuring that policies, procedures, and training opportunities with regard to reporting safeguarding concerns are compliant and effective.
- Guaranteeing that there is an effective Staff Code of Conduct that outlines behavioural expectations.
- Ensuring that a suitably trained DSL has been appointed, alongside deputy DSLs where appropriate.
- Ensuring that there are robust reporting arrangements, including inter-agency collaboration.
- Ensuring that there are appropriate procedures in place to handle allegations and LLC reported against members of staff.
-

The principal is responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- Assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are LLCs.
- Implementing this policy, and all related policies, throughout the school, and ensuring that staff adhere to it at all times.
- Safeguarding students' wellbeing and maintaining public trust in the teaching profession.
- Ensuring that all staff have undertaken safeguarding training.
- Ensuring that all staff have an ongoing awareness of LLC and reporting procedures.

The DSL is responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- Assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are LLC.
- Following all procedures outlined in this policy for acting upon LLC.
- Liaising with the principal, staff members, the governing board and all relevant agencies to act upon concerns, where necessary.
- Keeping detailed, accurate and secure records of all LLC and any actions taken.

Staff are responsible for:

- Adhering to all the relevant policies and procedures, including acting within the Staff Code of Conduct at all times.
- Interacting with students in a way that is respectful and appropriate for their level of authority and has due regard to the power imbalance between students and staff members.
- Understanding the importance of reporting low-level safeguarding concerns.
- Reporting any and all safeguarding concerns they may have about students immediately.
- Reporting any and all safeguarding concerns they may have about the behaviour of a member of staff immediately.

3. Prevention amongst staff

Appropriate and inappropriate behaviour

The school will ensure that all staff members are aware of the standards of appropriate behaviour expected towards students.

Staff will ensure that they pay due regard to the fact that:

- They are in a unique position of trust, care, responsibility, authority, and influence in relation to students.
- There is a significant power imbalance in the pupil-staff dynamic.
- There are more stringent expectations on their behaviour with regard to students due to their position as a public professional.
- Refer to Allegations of Abuse against Staff Appendix 12

Staff will remain aware of the fact that all students under the age of 18, regardless of the phase and year group they are at within the school, are children by law – resultantly, staff will ensure that they do not assume maturity on behalf of a student and do not engage with students as they would with their own peers. Staff will be aware that where there is any doubt regarding whether the behaviour of another adult is appropriate, this should be reported to the DSL, or Principal immediately.

Inappropriate behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour to behaviour which is ultimately intended to enable abuse. Examples of inappropriate behaviour that would constitute a low-level concern that should be reported to the DSL include, but are not limited to:

- Being overly friendly with children – this could include, but is not limited to, communicating with a child through personal social media or allowing inappropriate conversations or enquiries to occur with students, e.g. conversations that are about a staff member's personal life or are of a sexual nature.
- Having favourites – this could include, but is not limited to, calling students by pet names or terms of endearment or buying pupils gifts.
- Taking photographs of children on their personal mobile phones or devices – contrary to school policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Humiliating children.

Staff will be aware that some of the above LLC may meet the harms threshold depending on certain factors, e.g., the age or needs of the child or the content of exchanged messages, and that some of the above

incidents may not be concerns in context, e.g. a pre-approved, one-to-one meeting with a child behind a closed door between the child and a school counsellor who has received all appropriate safety checks.

Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that this does not negate the need to report the behaviour. Staff members who engage in low-level inappropriate behaviour in relation to students inadvertently will be made aware and supported to correct this behaviour in line with the Staff Code of Conduct. The principal will also evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour, or the staff cohort as a whole where low-level concerning behaviour is seen more widely.

The Chalfonts Community College culture

The school understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc.

The school will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members. All staff will read, understand, and adhere to the Appropriate and inappropriate behaviour subsection of this policy, as well as the Staff Code of Conduct.

Staff will address any questions they have regarding safeguarding to the DSL. The school will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the school community, e.g., students are not treated as friends and an appropriate professional distance is maintained by staff.

The school will ensure that all staff are sufficiently trained surrounding the reporting of safeguarding concerns as part of their induction, and that refresher training is conducted as necessary. The college will ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify inappropriate, concerning, or problematic behaviour towards students that may indicate a safeguarding concern, and how to identify signs of abuse or harm in students.

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially 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 school'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 school's staff behaviour policy. The Principal will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Evaluating The Chalfonts Community College culture following concerns

CCC will ensure that appropriate consideration is given to the school's culture and whether or not it has enabled the inappropriate behaviour to occur. The principal will review whether any changes need to be made to relevant policies or training programmes in light of any evaluations of the school's culture, in order to achieve an open and transparent culture that deals with all concerns promptly and appropriately.

4. Reporting Concerns

The school will promote a culture in which safeguarding pupils is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns, regardless of their relationship with the staff member.

Staff will report all safeguarding concerns they have to the DSL, immediately in line with the procedures laid out in the Child Protection and Safeguarding Policy. Staff members will report concerns without undue delay. Where the report concerns a specific incident, staff members will report their concerns no later than 24 hours after the incident where possible. Staff members will be aware that concerns are still worth reporting even if they do not seem serious.

Staff members will initially report their concerns to the principal, DSL or Vice-Principals verbally. When submitting concerns, staff will take care to ensure that they observe the Allegations of Abuse Against Staff Policy and protect the identity of all individuals to which the concern pertains as far as possible.

Staff members may request anonymity when reporting a concern, and the school will endeavor to respect this as far as possible. The school will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g., where it is necessary for a fair disciplinary hearing. In line with the Whistleblowing Policy, staff will be protected from potential repercussions caused by reporting a genuine concern.

Where a low-level concern relates to the principal, it should be reported to the chair of governors.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school staff will also be required to report this to the principal and DSL, who will, in turn, inform the employer of the subject of the concern.

5. Self-reporting

On occasion, a member of staff may feel as though they have acted in a way that:

- Could be misinterpreted.
- Could appear compromising to others.
- They realise, upon reflection, falls below the standards set out in the Staff Code of Conduct

The school will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have acted inappropriately or in a way that could be construed as inappropriate upon reflection. The principal and DSL will, to the best of their abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report.

Staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

6. Evaluating concerns

Where the principal and DSL are notified of a safeguarding concern, they will use their professional judgement to determine if the concern is low-level or if it must be immediately escalated, e.g. where a child is at immediate risk of harm. When deciding if a concern is low-level, the principal will discuss the concern with the DSL and the vice principals and will seek advice from the LADO where there is any doubt about whether the concern in fact meets the harm threshold. When seeking external advice, The Principal will ensure they adhere to the Data Protection Policy, and the information sharing principles outlined in the Child Protection and Safeguarding Policy at all times.

To evaluate a concern, The Principal and DSL will:

- Speak to the individual who raised the concern to determine the facts and obtain any relevant additional information.
- Review the information and determine whether the behaviour displayed by the individual about whom the concern was reported is consistent with the Staff Code of Conduct and the law.
- Determine whether the concern, when considered alongside any other LLC previously made about the same individual, should be reclassified as an allegation and dealt with alongside the Allegations of Abuse Against Staff Policy.
- Consult with, and seek advice from, external agencies when in doubt over the course of action to follow.
- Speak to the individual about whom the concern has been raised to inform them of the concern and to give them an opportunity to respond to it.
- Ensure that accurate and detailed records are kept of all internal and external conversations regarding evaluating the concern, and any actions or decisions taken.

7. Acting on concerns

Where the concern is unfounded

If it is discovered upon evaluation that the low-level concern refers to behaviour that was not considered to be

in breach of the Staff Code of Conduct and the law, the principal (DSL or Vice-Principals) will speak to the individual about whom the concern was made to discuss their behaviour, why and how the behaviour may have been misconstrued, and what they can do to avoid such misunderstandings in the future. The Principal (DSL or vice-principals) will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with school standards and the law. The Principal will take care to ensure that conversations with individuals who reported concerns that transpired to be unfounded do not deter that individual from reporting concerns in the future.

The Principal will discuss the concern with the DSL (and if they have been involved, the LADO) to discern whether the behaviour, and the reporting of this behaviour, is indicative of ambiguity in the school's policies or procedures, or the training it offers to staff. Where such ambiguity is found, the DSL and principal will work together to resolve this with input from other staff members, as necessary.

Reports about supply staff and contractors will be notified by the DSL to their employers so any potential patterns of inappropriate behaviour can be identified.

Where the concern is low-level

Where the principal determines that a concern is low-level, the school will respond to this in a sensitive and proportionate manner. The following procedure will be followed:

- The DSL holds a meeting with the individual about whom the concern was reported, during which they will:
    - Talk to the individual in a non-accusatory and sympathetic manner.
    - Inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible).
    - Clearly state what about their behaviour was inappropriate and problematic.
    - Discuss the reasons for the behaviour with the individual.
    - Inform the individual clearly what about their behaviour needs to change.
    - Discuss any support that the individual may require in order to achieve the proper standards of behaviour.
    - Allow the individual the opportunity to respond to the concern in their own words.
- The DSL asks the individual to re-read the Staff Code of Conduct
- The DSL and the principal will consider whether the individual should receive guidance, supervision or any further training.
- Where considered appropriate in the circumstances, the principal will develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves.
- Where it is necessary to undergo an investigation into the behaviour, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis.
- Where any student or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support, where appropriate.

The principal will ensure that all details of the low-level concern, including any resultant actions taken, are recorded and securely stored. The principal will ensure that these records are kept organised and up-to-date, and that it is easy to refer back to them if any other concerns are reported about the same individual.

The specific approach to handling LLC will be adapted on a case-by-case basis. It is unlikely that a low-level concern will result in disciplinary procedures; however, individuals may be given warnings in line with the Disciplinary Policy and Procedure where behaviour does not improve once it is brought to their attention. Where behaviour does not improve over a longer period of time, the concerns will be escalated and dealt with in line with the Allegations of Abuse Against Staff Policy.

Where the concern is serious

The principal may decide upon evaluation that a concern is more serious than the reporter originally thought, e.g., when viewed in conjunction with other evidence or other concerns made about the same individual. Where this decision is made, the concern will be escalated and dealt with as an allegation. The principal will then follow the procedures laid out in the Allegations of Abuse Against Staff Policy.

8. Record keeping

The school will retain all records of LLC, including those that were found to be unfounded. The principal will ensure that all records include the most accurate and up-to-date information and will store them in the electronic LLC file. The principal will ensure that all LLC are stored together, in an organised and consistent manner, to ensure they can be easily reviewed and analysed where necessary.
Records will include:

- A clear and comprehensive summary of the concern.
- The context in which the concern arose.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached, and the outcome.
- The name of the individual sharing concerns – if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.

The DSL will periodically review the recent LLC made to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort as a whole. The DSL will keep records of these reviews.

Where any concerning patterns of behaviour have been identified with regard to a member of staff, the DSL will consult with the principal to decide on a course of action. Where a pattern of behaviour has become so concerning that it meets the harms threshold, this will be referred to the LADO as soon as practicable. It should be considered whether there are any wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies, including this one, could be revised, or extra training provided to staff to decrease the risk of it happening again.

- 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 harm threshold, we will refer it to the designated officer at the local authority

Records of LLC will not be kept in the personnel file of the individuals to whom the concerns pertain, unless there have been multiple LLC made about the same individual. Where a concern is thought to be serious and is processed as an allegation, records of this will be kept in staff personnel files. Where multiple LLC have been made about the same individual, these will be kept together, and in chronological order.

Where an allegation is made about an individual who has previously been subject to such allegations, or where a low-level concern is reclassified as a serious concern after meeting the harms threshold, all records of LLC about that individual will be moved to the staff personnel file and kept alongside records of the allegation.

The DSL will ensure that all records are kept in a manner that is consistent with the Data Protection Policy. Records will be confidential, and shared only with the Principal and will be destroyed after the staff member to whom the concerns pertain has left CCC

When providing employment references, the school will ensure that any information provided confirms whether they are satisfied with the applicant's suitability to work with children, and only provide the facts of any substantiated safeguarding concerns or allegations, including a group of LLC about the same individual, that meet the harm threshold.

Any repeated low-level safeguarding concerns or allegations which do not meet the harm threshold which have been found to be false, unfounded, unsubstantiated, or malicious will not be included in any reference.

The principal will decide in exceptional circumstances if a reference cannot be provided or if certain questions asked by the prospective employer cannot be answered, with HR advice sought when appropriate.

9. Monitoring and review

This policy will be reviewed annually by the principal and DSL, and in response to any new safeguarding requirements or concerns surrounding the wider cultural issues in the school. The next scheduled review for this policy is August 2025.

History (CP/SG Policy)

Date	Issue	Status	Comments
October 2022	1	New	
January 2024		Update	Dfe Document date changes
		Update	Terminology Changes from LAC to CLA
September 2024		Update Added Added	Dates, Terminology Appendix 12 Low Level Safeguarding Concerns Appendix 13 Allegations of abuse against staff