

# The Chalfonts Community College

# CHILD PROTECTION AND SAFEGUARDING POLICY

2022-2023

Approved by:	SLA Committee	Date: 3 <sup>rd</sup> October 2022
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#### **Statement of Intent**

<u>Chalfont Community College</u> (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.

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 2018, "Keeping Children Safe in Education 2022" Keeping children safe in education 2022 (publishing.service.gov.uk) 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).

# The CCC Safeguarding Team comprises of the following:

Designated Safeguarding Lead: Mrs M Wall (Senior Assistant Principal)

Deputy DSL (DDSL): Mrs S Austin (DDSL)

Safeguarding Officer: Mr J Howard (Assistant Principal)
Safeguarding Officer: Mrs P Procopi (Assistant Principal)

Safeguarding Officer: Ms S Jones (Vice Principal)
Safeguarding Officer: Mrs C Whitehead (Principal)

Nominated Safeguarding Governor - Stuart Dennis

Chair of Governors (Name and contact details – Peter Solloway

**Contacts in The Local Authority** 

Contacts in The Local Authority	
Education Safeguarding Advisory Service	01296 387981
ESAS	Secure-esasduty@buckinghamshire.gov.uk
offers support to education providers to assist	
them to deliver effectively on all aspects of their	
safeguarding responsibilities	
First Response Team (aka MASH)	01296 383962
(including Early Help, Channel)	Out of hours 0800 999 7677
The First Response Team process all new	Secure-
referrals to social care, including children with	cyp.firstresponse@buckinghamshire.gov.uk
disabilities. Referrals are assessed by the team	cypinion esponse a backing namonii ergoviak
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.	01206 202070
Local Authority Designated Officer (LADO)	01296 382070
The Buckinghamshire Local Authority	Secure- <u>lado@buckinghamshire.gov.uk</u>
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	
<b>Bucks Family Information Service</b>	01296 383065
https://familyinfo.buckinghamshire.gov.uk	
Information for families on a range of issues	
including childcare, finances, parenting and	
education	
<b>Buckinghamshire Safeguarding Children Pa</b>	rtnership (BSCP)
https://www.buckssafeguarding.org.uk/childrenpa	artnership
Procedures, policies and practice guidelines	
Schools Web - https://schoolsweb.buck	scc.gov.uk/
School bulletin, Safeguarding links, A-Z guide to in	
Buckinghamshire Council Equalities &	01296 382461
School Improvement Manager	Yvette.thomas@buckinghamshire.gov.uk
Buckinghamshire Council Prevent Co-	01296 674784
ordinator	Alisonwatts1@buckinghamshire.gov.uk
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Thames Valley Police	101 (999 in case of emergency)
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# Other contacts

NSPCC	0800 800 5000
	www.nspcc.org.uk
Childline	0800 11 11
	www.childline.org.uk
Kidscape – Parent Advice Line (bullying)	020 7823 5430
(Mon-Weds from 9:30am to 2:30pm)	www.kidscape.org.uk
(Fight Weds from 5150diff to 2150pin)	- THININGSCAPETOL GLAN
Female Genital Mutilation Helpline (NSPCC)	0800 028 3550
	fgmhelp@nspcc.org.uk
Samaritans – Helpline	116 123
	www.samaritans.org
Forced Marriages Unit - Foreign and	020 7008 0151
Commonwealth Office	fmu@fco.gov.uk
Crimestoppers	0800 555 111
Independent UK charity taking crime	
information anonymously   Crimestoppers	
(crimestoppers-uk.org)	
R-U Safe? Barnardos - Children/Young People	01494 785 552
Sexual Exploitation Service	
www.barnardos.org.uk/rusafebucks	
CEOP (Child Exploitation and Online Protection)	
www.ceop.police.uk/	

# **Policies and Processes:**

Written policies and procedures are in place to deal effectively with child protection and safeguarding issues, which include tackling radicalisation and extremism, together with recording and monitoring processes (via CPOMS). 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 (2022).

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 College are clear of their role and responsibilities.

#### **Prevent:**

Our Safeguarding Policy also complies with our statutory duty under Section 26 of the Counter-Terrorism and Security Act 2015 that states that all educational establishments must have due regard to the need to prevent people from being drawn into terrorism - this is called the Prevent Duty. Further information regarding this, and advice around avoiding extremism can be found in our prevent strategy.

# Revised Prevent duty guidance: for England and Wales

For further practical advice on how to protect children from the dangers of extremism, which includes information on the warning signs, how parents should talk to children about extremism and the steps concerned parents should take please visit <a href="educateagainsthate.com">educateagainsthate.com</a>.

To promote a safe environment for students, CCC employs a strict selection and recruitment policy which includes all statutory checks on staff and regular volunteers including Enhanced DBS (disclosure and barring service) checks.

# **Training:**

As a minimum, all CCC staff are trained to level 1 safeguarding; attending an annual update training session each academic year. 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 from this academic year; a commitment of the importance we here at CCC place on Safeguarding. All staff 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.

All members of CCC understand and are committed to the vital contribution that staff, parents and students make to safeguarding children. Every member of staff has a shared understanding of the importance of providing an environment that helps children feel safe and respected and we actively promote a culture that encourages children to talk openly and have the confidence to know that they will be listened to.

# **Reporting Concerns:**

Staff are required to report any causes of concern to the school safeguarding team via CPOMS. All concerns raised from CPOMS are acted upon during the day of receipt, 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) will soon (Autumn Term 2022) also be able to register any safeguarding concerns that they may have via our anonymous online reporting system – Whisper: Whisper Anonymous Reporting | SWGfL

Alternatively if a child is in imminent danger - please do call 999 for the Police.

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 <a href="#">CEOP website</a>.

https://www.ceop.police.uk/Safety-Centre

We are very aware that a current major issue facing education is sexual abuse in schools and, and like all schools are currently assessing our own setting following the Ofsted report into sexual abuse published in June 2021. We will be looking at establishing links and working with organisations such as 'Bold Voices' and 'Be Her Lead" in order to empower girls and women in schools as well as educational work for all staff and students.

#### Attendance:

Student attendance is monitored closely via Form Tutors, Year Teams and our School attendance officers. Concerns are shared as appropriate with parents/carers, the schools Participation Officer, the Schools Officer, Social Care and the School Safeguarding Team. The College has weekly meetings where students of concern are discussed and **Curriculum:** 

Our curriculum is designed to promote and raise awareness in students of safeguarding issues (including e-safety, mental health and sexual abuse and harassment) and how to deal with them. Issues are covered in our PSHE (Personal Social and Health Education) programme, our assembly programme, during form times, more generally throughout the curriculum and also in our Safeguarding Week. Parents, carers and all stakeholders of CCC are also kept updated via Safeguarding newsletters throughout the academic year.

**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 when necessary in order to safeguard our young people.

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

Acronym	Long form	Description
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
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).
ЕНА	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.
НВА	'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.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
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'	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.

# 1. Definitions

The terms "children" and "child" refer to anyone under the age of 18. For the purposes of this policy, "safeguarding and protecting the welfare of children" is defined as:

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

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

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

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

For the purposes of this policy, "sexual harassment" refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of 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

# 2. Legal Framework

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

# 2.1 Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021

# 2.2 Statutory Guidance

- DfE (2015) 'The Prevent duty'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2018) 'Disqualification under the Childcare Act 2006
- DfE (2022) 'Keeping children safe in education 2022'
- 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'

# 2.3 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'

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
- LAC & PLAC Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy
- Staff Code of Conduct
- Behaviour Policy

# 3. Roles and Responsibilities

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the student.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned. At CCC we actively promote to staff that 'it does happen here'.
- Provide a safe environment in which students can learn.
- Be prepared to identify students who may benefit from early help from the Family Support Service (FSS).
- Be aware of the college's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
  - Staff must maintain a good working knowledge of the Buckinghamshire
     Continuum of Need The Continuum of Need Buckinghamshire Safeguarding

<u>Children Partnership (buckssafeguarding.org.uk)</u> 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.
- Undertake safeguarding training, including online safety training, during their induction and at subsequent regular intervals.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Have increased awareness of contextual and CCC specific safeguarding issues that can put students at risk of harm.
- Be aware of behaviours linked to issues such as drug-taking and alcohol misuse, and be able to identify other signs that students may be at risk for example deliberately missing education, and sharing indecent images could be an indication of exploitation.
- For all staff, knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure they should always speak to the DSL / DDSL. In exceptional circumstances, such as in emergency or a genuine concern that appropriate action has not been taken, staff members can speak directly to children's social care:

Bucks Childrens Services 01296 383962 Hillingdon Children's Services 01895 556633 Hertfordshire Children's Services 0300 123 4043

Teachers, including the Principal, have a responsibility to:

- Safeguard students' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Provide a safe environment in which students can learn.
- Report suspected and actual abuse swiftly to the DSL

# The Governing Body has a duty to:

- Take strategic leadership responsibility for the college's safeguarding arrangements.
- Ensure that the college complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the college contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirm that the college's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.

Ensure the DSL completes an Annual Safeguarding Report for Governors and a copy is shared with the Education Safeguarding Advisory Service at

- Buckinghamshire Council
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the school's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that staff working directly with children read at least Part one of KCSIE 2022 (which is then recorded onto the school's SCR).
- Ensure that staff who do not work directly with children read either Part one or Annex A of KCSIE 2022.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure a senior leader takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the roleholder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they
  are trained to the same standard as the DSL and that the role is explicit in their job
  description(s).
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the student's wishes and feelings are taken into account when determining what action to take and what services to provide. Students will also be made aware that at times, given the risk of harm that is present (or has happened) the SG team may need to override a student's wishes of what action needs to be taken.
- Ensure systems are in place, so that children can confidently report abuse, knowing that
  their concerns will be treated seriously, and they can safely express their views and give
  feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.

# 3.1 The Governing Body

Ensure that a member of the governing board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Principal or another governor. If there are concerns that issues are not being progressed in an expedient manner, staff/pupils/parents/carers should escalate concerns to the Local Authority Designated Officer (LADO) via First Response.

The governing body has a statutory duty to appoint a Nominated Governor for safeguarding. The Nominated Governor must be familiar with <u>Buckinghamshire Safeguarding Children Partnership</u> procedures, Local Authority procedures and guidance issued by the Department for Education. The Nominated Governor must:

Work with the DSL to produce the Child Protection Policy annually.

Undertake appropriate safeguarding training, to include Prevent and Safer Recruitment training. 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)

## 3.2 Governors

All governors must complete safeguarding training on appointment, to also include Prevent training. This training must be regularly updated in line with national or local guidance.

- Guarantee that there are effective and appropriate policies and procedures in place.
- Ensure all relevant persons are aware of the college's local safeguarding arrangements, including the governing board itself, the SLT and DSL / DDSL.
- Make sure that students are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who
  work with children, taking proportionate decisions on whether to ask for any checks
  beyond what is required.
- Ensure that staff are appropriately trained to support students to be themselves at 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.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- 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 LAC 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 LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the student's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for students who go missing from 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.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements

# 3.3 The Principal has a duty to:

- Ensure that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff with the appropriate policies and information upon induction.
- Ensure the DSL (and DDSL) are adequately supported and supervision is in place to support them

# 3.4 The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Creating a culture of safeguarding within the school wherechildren are protected from harm
- Ensuring all staff receive an effective induction and ongoing training to support them to recognise and report any concerns.
- Ensuring children receive the right help at the right time using the Buckinghamshire Continuum of Need document.
- Ensuring referrals to partner agencies, are followed up in writing, including referrals to First Response and Early Help (FSS).
- Establishing and maintaining a safe and secure system for recordin and recording safeguarding and child protection records. These records must be audited regularly to ensure all actions are completed.
- Ensuring all child protection files are held separately from pupils' educational records.
- Maintaining the record for staff safeguarding training. Ensuring that the safeguarding team contact details and photos are displayed in prominent areas around the school and also on the website.
- Being the designated point of contact for staff to be able to discuss and share their concerns.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns.
- Arrange, alongside the school, adequate and appropriate cover for any activities outside
  of school hours or terms. (This information will be arranged and shared with the trip
  leader.)

# • 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 college. This includes:
  - Ensuring that the college 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 each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the governing board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- 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.
- Support and advise staff and help them feel confident on welfare, safeguarding and child
  protection matters: specifically, to ensure that staff are supported during the referrals
  processes; and to support staff to consider how safeguarding, welfare and educational
  outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within 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.
- Keep detailed, accurate, secure written records of concerns and referrals, and understand the purpose of this record-keeping.

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

#### 3.5 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.

# 4. Multi-agency Working

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

CCC will be fully engaged, involved, and included in local safeguarding arrangements. Once we are named as a relevant agency by local safeguarding partners, we will follow our statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. CCC will act in accordance with the safeguarding arrangements.

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.

# **Information Sharing**

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.

# 5. Early Help

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

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

As part of our regular Safeguarding meetings, the SG team will reflect on cases in order to inform future practice.

# 6. Abuse and Neglect

For the purposes of this policy, "abuse" is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others — this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may

be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

Refer to the following guidance:

"What to do if You're Worried a Child is Being Abused" Stat guidance template (publishing.service.gov.uk)

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

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

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

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

All staff will be aware of the indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a

pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

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

# 7. Specific safeguarding issues

There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.

<u>Appendix A</u> of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

# 8. Child-on-child Abuse

For the purposes of this policy, **"child-on-child abuse"** is defined as abuse between children. The College has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy's <u>statement of intent</u>.

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.

# 9. Online Safety and Personal Electronic Devices

The College will adhere to the E-Safety and Online Safety Policy at all times.

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

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

- Student attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a student's online activity. The College has ensured that suitable filtering systems are in place on ICT equipment to prevent children accessing inappropriate material. This is through the use of Smoothwall. Smoothwall Filter is the only fully content-aware web filter in education. It keeps users safe by categorising new and existing content in real-time by analysing the content, context and construction of each page. Combined with a powerful reporting suite, social media controls and Bring Your Own Device (BYOD) functionality, Smoothwall Filter allows CCC to review and control what students see online and raises any concerns direct to the designated staff 9Safeguarding Team) of any infringements.

The College will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what students can be taught online.

Staff will be aware of the filtering systems in place and will know how to escalate concerns where they are identified

Further information regarding the College's approach to online safety can be found in the E-Safety and Online Safety Policy.

# 9.1 Communicating with parents

As part of the usual communication with parents, the College 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.

# 9.2 Reviewing Online Safety

CCC will carry out an annual review of its approach to online safety, supported by an annual risk

assessment that considers and reflects the risks faced by students.

#### 9.3 Personal Electronic Devices

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.

# **Upskirting**

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

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

# 10. Consensual and non-consensual sharing of indecent images and videos

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

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

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

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

- Refrain from viewing, copy, printing, sharing, storing or saving the imagery
- Tell the DSL immediately if they accidentally view an indecent image and seek support.

- Explain to the student that the incident will need to be reported
- Respond positively to the student without blaming or shaming anyone involved, and reassuring them that they can receive support from the DSL
- Report the incident to the DSL

The DSL alongside one other member of the Safeguarding team and / or Year Team (who are Level 3 Safeguarding trained) 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.

# 11. Context of Safeguarding Incidents

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

# 12. Students Potentially at Greater Risk of Harm

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. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

#### 12.1 Students who Need Social Workers

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

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

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

# 12.2 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.

# 12.3 LAC and PLAC

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

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

• Looked after legal status, i.e. whether they are looked after under voluntary

- arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the student.

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

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

#### 12.4 Students with SEND

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

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the student's disability without further exploration; however, it should never be assumed that a student's indicators relate only to their disability
- Students with SEND can be disproportionally impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers When reporting concerns or making referrals for students with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a student with SEND, the DSL will liaise with the school's SENCO, as well as the student's parents where appropriate, to ensure that the student's needs are met effectively.

# 12.5 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.

# 12.6 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.

# 13. Use of the School Premises for Non-school Activities

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.

## 13.1 Extracurricular Activities and Clubs

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.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

# 14. Alternative Provision

CCC remains responsible for a student's welfare during their time at an alternative provider. When placing a student with an alternative provider, CCC will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff. We will also conduct site visits to ensure that the alternate provider is complying with our Safeguarding regulations and providing the relevant and appropriate curriculum to the student(s).

# 15. Work Experience

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

# 16. Homestay Exchange Visits

# **16.1** School-arranged Homestays in UK

Where the College is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, the school is the regulated activity provider; therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

Where criminal record information is disclosed, the College will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, the College will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

# 16.2 School-arranged Homestays Abroad

CCC will liaise with partner schools to discuss and agree the arrangements in place for the visit. The College will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK. CCC will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Students will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

# **16.3 Privately Arranged Homestays**

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

# 16.4 Private Fostering

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

# 17. Concerns about Students

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 <u>communication and confidentiality</u> 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, or deputy 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.

# 18. Managing Referrals

The reporting and referral process outlined in <u>Appendix B</u> will be followed accordingly.

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 multiagency 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.

# 19. Concerns about College Safeguarding Practices

If a staff member has concerns about another member of staff (including supply staff and volunteers), it will be raised with the DSL. If the concern is with regards to the Principal, it will be referred to the chair of governors.

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

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whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

# 20. Safeguarding concerns and allegations of abuse against Staff

All allegations against staff, supply staff, volunteers and contractors will be managed in line with the College's Allegations of Abuse Against Staff Policy. 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 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.

# 21. Communication and 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 College will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the College will do all it can to protect the anonymity of the students involved in the case.

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

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

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

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

Where a student is leaving 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.

# 22. Safer Recruitment

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

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

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

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

The governing body (through the SG Link governor) will conduct the appropriate preemployment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

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

#### 22.1 Staff Suitability

All staff members are required to sign the <u>declaration form</u> provided in the appendices of this policy confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school, unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

# 22.2 Ongoing Suitability

Following appointment, consideration will be given to staff and volunteers' ongoing suitability — to prevent the opportunity for harm to children or placing children at risk. At CCC we maintain an environment and awareness where by staff understand that 'it could happen here', in order to deter and prevent abuse and challenge in appropriate behaviour.

#### 22.3 Referral to the DBS

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

# 23. Single Central Record (SCR)

CCC keeps an SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the school. This will be checked on a half-termly basis by the DSL, and also checked by the SG Link Governor throughout the year.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions (Governors and postholders)

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

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

Written confirmation that supply agencies have completed all relevant checks will also be included.

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

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

# 24. Training

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, including the safeguarding response to children who go missing from education.
- Appropriate child protection and safeguarding training, including online safety training.
- Information about the role and identity of the DSL and deputy DSL.

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

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

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

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 part of CCC's commitment to ensure effective safeguarding.

# 25. Monitoring and Review

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 **June 2023**.

# **APPENDIX A: 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. Here are the issues covered:

- 1. Domestic abuse
- 2. Homelessness
- 3. Children missing from education
- 4. Child abduction and community safety incidents
- 5. Child criminal exploitation (CCE)
- 6. Cyber-crime
- 7. Child sexual exploitation (CSE)
- 8. Modern slavery
- 9. FGM
- 10. Forced marriage
- 11. Radicalisation
- 12. Pupils with family members in prison
- 13. Pupils required to give evidence in court
- 14. Mental health
- 15. Serious violence

#### **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.

All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Domestic abuse can take many forms and can include a pattern of threatening behavior; 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.

#### **Homelessness**

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible. Indicators that a family may be at risk of homelessness include:

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

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

# **Children missing from education**

A child going missing from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation. Staff will monitor 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.

## **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.

## 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.

### Child criminal exploitation (CCE)

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

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

Specific forms of CCE can include:

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

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.

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

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

## **County Lines**

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

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

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

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

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

#### **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.

#### Child sexual exploitation (CSE)

For the purposes of this policy, "child sexual exploitation" is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce,

manipulate or deceive a child into sexual activity, for any of the following reasons:

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

CCC recognises that CSE can occur over time or be a one-off occurrence, and may happen without the student's immediate knowledge, e.g. through others sharing videos or images of them on social media. 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. CCC also recognises that students may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

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

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

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

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

## **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.

#### **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.

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

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

Indicators that FGM may take place soon include:

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

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

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

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

## **Forced marriage**

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

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

- Being absent from College 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.
- Being removed from a day centre when they have a physical or learning disability.
- 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.

#### **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.

## **The Prevent Duty**

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

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

#### **Risk Indicators of Vulnerable Students**

Indicators of an identity crisis include the following:

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society

Indicators of a personal crisis include the following:

- Family tensions
- A sense of isolation
- Low self-esteem
- Disassociation from existing friendship groups
- Searching for answers to guestions about identity, faith and belonging

Indicators of vulnerability through unmet aspirations include the following:

- Perceptions of injustice
- Feelings of failure
- Rejection of civic life
- Indicators of vulnerability through criminality:
- Experiences of dealing with the police
- Involvement with criminal groups

## **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.

## **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/\_

## 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.

### 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.

#### **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 or DDSL. The College has designated the DSL to be the Mental Health Lead for students (due to the large correlation of Safeguarding concerns that this also presents).

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.

### **Serious violence**

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

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

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

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

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

## **SIGNS AND SYMPTOMS**

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

#### 1. Physical Signs of Abuse

- Any injuries not consistent with the explanation given for them
- Injuries which occur to the body, in places which are not normally exposed to via falls,
- Injuries which have not received medical attention
- Neglect- under nourishment, failure to grow, constant hunger, stealing or gorging food,

- untreated illnesses, inadequate care, etc.
- Reluctance to change for, or participate in, games or swimming
- Repeated urinary infections, or unexplained tummy pains
- Bruises, burns, bites, fractures etc. which do not have an accidental explanation
- Cuts/scratches/substance abuse.

## 2. Emotional Signs of Abuse

- Changes of regression in mood or behaviour, particularly where a child withdraws or becomes 'clingy'. Also, depression/aggression, extreme anxiety
- Nervousness, frozen watchfulness
- Obsessions or phobias
- Sudden under achievement or lack of concentration
- Inappropriate relationships with peers and/or adults
- Attention-seeking behaviour
- Persistent tiredness
- Running away / stealing / lying.

## 3. Signs of Possible Sexual Abuse

- Any allegations made by a child concerning Sexual Abuse
- Child with excessive preoccupation with sexual matters, and detailed knowledge of adult sexual behaviour; or who regularly engages in age-appropriate sexual play
- Sexual activity through words, play or drawing
- A child who is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares; sometimes with overt or veiled sexual connotations
- Eating disorders anorexia, bulimia.

## 4. Signs of Possible Sexual Exploitation

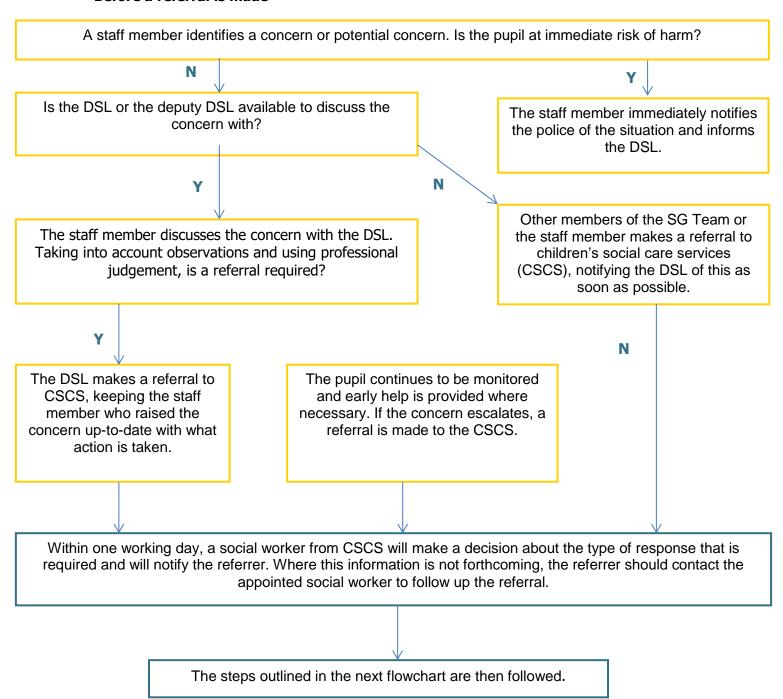
- Children who appear with unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections or become pregnant
- Children who suffer from changes in emotional well being
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late
- Children who regularly miss school or education or don't take part in education

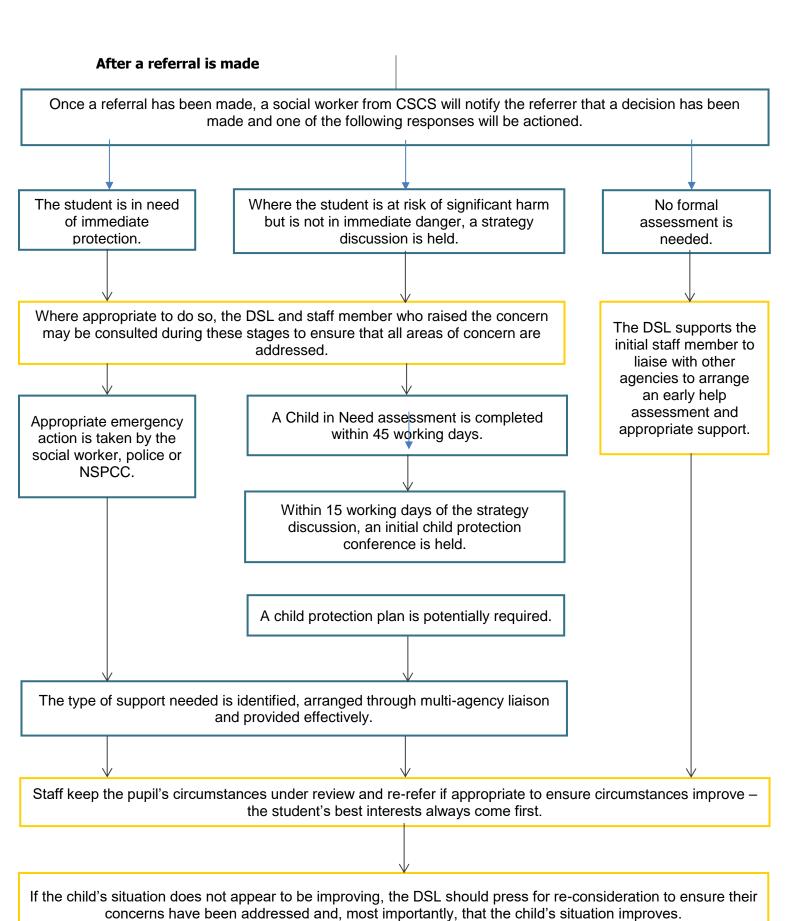
## **APPENDIX B: Safeguarding Reporting Process**

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





# APPENDIX C: 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 Colege 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). <a href="https://www.londoncp.co.uk/index.html">https://www.londoncp.co.uk/index.html</a>

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?				

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)
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 D: Peer on Peer Protocol**

# Protocol for dealing with conflict situations between students with police involvement Septmber 2022

This is an internal protocol that has been adopted by the school to deal with situations that are of a sensitive 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	To be completed immediately
		Staff team 1 support	
		Staff team 2 lead	
		Staff team 2 support	
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	To be completed immediately
		Staff team 2 lead	·
4	Meet with parents to agree the initial draft of the risk assessment (Appendix 2) and to complete points	Staff team 1 lead	Date completed
	5,6,7,8	Staff team 1 support	
	As part of the risk assessment include plans for school trips and non-curriculum days. These are to be	Staff team 2 lead	Date completed
	discussed prior to the event and strategies	Staff team 2 support	
	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.		
5	Set the date to review the risk assessment (point 9)  Agree a member of staff each student(s) will see if	Staff team 1	Date completed
J	issues arise and how/when they can see them (Team	Stair toairi 1	Date completed
	support). This person must complete a log of meetings (Appendix 3)	Staff team 2	Date completed
6	Offer internal support, e.g. Transform (must be different mentors), or external counsellor	Staff team 1	Date completed
_		Staff team 2	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	Staff team 1	Date completed
	a lesson unexpectedly and inform them before and/or afterwards depending on the circumstances	Staff team 2	Date completed
8.	Students to sign an agreement (Appendix 4)		
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	Date completed
		Staff team 2	Date completed
10	Agree review meetings with parents	Staff team 1	Date completed
		Staff team 2	Date completed

# **APPENDIX E: Guidance & Protocol for Child on Child Abuse (See 12.8)**

## <u>INDIVIDUAL STUDENT RISK ASSESSMENT - DRAFT</u>

Student's Name: Assessor's Name:						Date:		Review Date		
BEHAVIOUR	WHEN?	MOST AT RISK	HOW LIKELY?	X	HOW OFTEN?	Х	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; potentia   triggers etc.	Who is most likely to be harmed and how?	5=Certain 4=Probable 3=Possible 2=Not impossible 1=Never	le le	5=Daily 4=Weekl y 3=Monthl y 2=Rarely 1=Never		(Include an assessment of the likely physical and psychologica I 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 fore	esee.		
Signed (Student) Date			
Signed (Parent) Date			

## **APPENDIX F: 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 G: Serious Incident Record**

Serious Incident Record No:								
Name of person completing this report:								
Name of Young								
Person:								
Location of Incident:								
Full Names of Staff I	nvolved:							
Start Time of serious Incident:	Duration of any Restrai		Any Injuries	Medi	ical Check:	Incident reviewed with Young person:		
Hr Mins	Mins	1110.	Child	Offer	ed $\square$	Offered		
			Other	Accep		Accepted		
Nature of Risk			rnal Agencies	<u> </u>	Supporting	Records Completed		
		Info	mea					
Injury to person Damage to property Criminal Offence Serious Disruption Absconding		Parer Socia	cal Staff ht/Guardian I Worker ng Authority		Bound Book Accident Re Medical Rep RIDDOR Formal State	port   ort		
<b>Environments and Tr</b>	iggers:							
	Describe what was happening and what led up to a dangerous situation:							
Low	Circle the level of potential risk.  Low Medium High							
Circle and/or describe p  Verbal abuse	_ '	the ris unch	k was. BitePinch		SpitKick	☐Hair Grab		
☐ Neck grab ☐ C	Clothing grab		Body holds	Arm g	rab \_\	Veapons/Missiles		
Other:								
Who was at risk?								
<b>Controling Risk</b> Describe any changes you made to routines, personnel or the environment in an attempt to reduce the risk of this happening.								
DIVERSION, DISTRA	CTIONS AND	DEE	SCALATION ATTE	MPTEI	)			
Verbal advice and su	ipport	Firm o	clear directions	Nego	tiation	imited 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:
Other.
DUVCTOAL INTERVENTION CERATECTES ATTEMPTED
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 H: Disqualification Declaration**

Chalont Comr	nunity College:			
Name of staff	member:		Position:	
Orders and	other restricti	ons		Yes/No
Have any orde	ers or other det	erminations related to childe	care been made in	
respect of you				
,		erminations related to childe	care been made in	
	hild in your care			
•		erminations been made whi		
_	gistered in relat	tion to childcare, children's h	nomes or	
fostering?				
•		orders, restrictions or prohil	•	
		1 of the Childcare (Disquali		
•	•	ion Free of Charge) (Exten	ded Entitlement)	
	Regulations 20			
		with children by the DBS?		
	bited from teac			
	d statutory of			
		ed, reprimanded, given a wa	rning for or convict	ed of:
		or involving a child?		
		offence against an adult?		
		ne Sexual Offences Act 2003	?	
	ther relevant of			
		ed, reprimanded for or convi	cted of a similar	
	other country?			
	information			
	•	•	provide details bel	ow. You may provide this information
		so without delay.		
Details of the	order restriction	n, conviction or caution:		
The date(s) o				
The relevant	` '			
body/bodies):				lation at Tourslation to continue
	-			iction, etc. In relation to cautions
	rictions, a DBS	S certificate may be provi	aea.	
Declaration	· · ·			
	•	•		est of my knowledge and that:
		consibilities to safeguard chi		thing that affects my suitability to wall
				thing that affects my suitability to work
		would render me disqualifie		orders or other determinations made
	pect of file tilat	would refluer the disqualifie	a non working wit	II CHIICICII.
Signed: Print name:				
Date:				
I Date.	i			

## **APPENDIX I: Protocol for Passing Information to The Police**

Haydon 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 Headteacher 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 Headteacher 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.

## 3.1 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.

## 3.2 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 J: Contacts and Advice**

## **Expert Organisations**

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

# **Document History**

Date	Issue	Status	Comments

Sept 2022	1	New	Newly Created