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# **CHILD PROTECTION AND SAFEGUARDING POLICY**

**(including safer recruitment, allegations  
against staff and low-level concerns)**

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This document is based on guidance from Keeping Children Safe in Education (KCSIE) (2023 version) and Working Together to Safeguard Children 2018 and follows the Surrey County Council Model Policy.

If the Government re-issues this guidance during the 2023/2024 period the Policy will be updated to ensure it is compliant with any changes.

Person(s) Responsible:	Mr J Cleary
Governors' Committee:	Full Governing Board
Last Review Date:	Autumn 2023
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Status:	Statutory – annual review

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## Safeguarding Statement 2023

### **'Safeguarding is Everyone's Business'**

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

We make every effort to provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

The purpose of this policy is to provide staff, volunteers and Governors with the framework they need in order to keep children safe and secure at Collingwood College. The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

## Key Personnel

The Designated Safeguarding Lead (DSL) is Mr J Cleary  
Contact details: 01276-457600 [dsl@collingwood.surrey.sch.uk](mailto:dsl@collingwood.surrey.sch.uk)

Deputy DSL(s) are Mrs J Hawkemore and Mr P Jarmyn  
Contact details: 01276-457600 [dsl@collingwood.surrey.sch.uk](mailto:dsl@collingwood.surrey.sch.uk)

The nominated Safeguarding Governor is Mr S W Barker  
Contact details via the Clerk to the Governing Board [s.rutherford@collingwood.surrey.sch.uk](mailto:s.rutherford@collingwood.surrey.sch.uk)

The Principal is Mr E Tanner  
Contact details: 01276-457600

The Chair of Governors is Mr S W Barker  
Contact details: [chair@collingwood.surrey.sch.uk](mailto:chair@collingwood.surrey.sch.uk)

## Terminology

Safeguarding and promoting the welfare of children is defined as:

- protecting children from abuse and maltreatment.
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- taking action to enable all children to have the best outcomes.
- preventing impairment of children's mental or physical health or development.

Child Protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Early help means providing support as soon as any needs emerge or are identified at any point in a child's life.

Staff refers to all those working for or on behalf of the College, full or part time, temporary or permanent, in either a paid or voluntary capacity.

Child(ren) includes everyone under the age of 18. On the whole, this will apply to students at the College; however, the policy will extend to visiting children and students from other establishments.

Parents refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

Social Care refers to Children's Services in the area in which the child is resident, unless a child is a Child Looked After then this will be the Children's Services in their home authority.

MAP refers to the Surrey Multi-Agency Partnership.

C-SPA refers to the Children's Single Point of Access.

DSL where appropriate also refers to Deputy Designated Safeguarding Lead (DDSL)

## Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended).

All action taken by Collingwood College will be in accordance with:

Statutory, national, and local guidance – this includes:

- [Working Together to Safeguard Children \(2018\)](#) which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of settings.
- ['What to do if you are Worried a Child is Being Abused' 2015 - Advice for Practitioners](#)
- [Keeping Children Safe in Education \(KCSIE, 2023\)](#) is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.
- [Local Guidance from the Local Safeguarding Partnership: Surrey Safeguarding Children Partnership \(SSCP\) including SSCP Procedures.](#)

This policy applies to all members of staff and Governors in the College.

Guidance and documents referred to in this policy:

- [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)
- [Working Together to Safeguard Children 2018](#)
- [Keeping Children Safe In Education 2023](#)
- [Disqualification under the Childcare Act 2006 \(updated 2019\)](#)
- [FGM Act 2003 Mandatory Reporting Guidance 2015 \(updated January 2020\)](#)
- ['What to do if you are worried a child is being abused' 2015](#)
- [Teachers' standards](#)
- [Information sharing advice for safeguarding practitioners](#)
- [The Equality Act 2010](#)
- [Early years foundation stage \(EYFS\) statutory framework](#)
- SCC Safeguarding Children Missing Education (CME) and Educated Other Than at School (EOTaS) – available on [Surrey Education Services \(Education Safeguarding Team Resources Hub\)](#)
- SCC Touch and The Use Of Physical Intervention When Working With Children And Young People – available on [Surrey Education Services \(Education Safeguarding Team Resources Hub\)](#)

This policy should be read in conjunction with the following policies (available on request):

- Recruitment and Selection Guidance Policy
- Whistleblowing Policy
- Staff Code of Conduct
- Management of Behaviour Policy
- E-Safety/Online Safety Procedure
- Attendance Policy
- Health, Safety and Welfare Policy
- Anti-Bullying Policy
- Attendance Policy
- Complaints Procedure
- Looked After Children and Previously Looked After Children Policy

- Single Equality Policy
- Special Educational Needs and Disabilities Policy
- Supporting Students with Medical Needs Policy
- Recruitment Privacy Notice

## Equalities Statement

With regards to safeguarding we will consider our duties under the [Equality Act 2010](#) and our general and specific duties under the [Public Sector Equality Duty](#). General duties include:

- Eliminating discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.
- Advancing equality of opportunity between people who share a protected characteristic and people who do not share it.
- Fostering good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

Details of our specific duties are published under Collingwood College's equality statement and measurable objectives. These are available on our website.

Staff are aware of the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND). This will be in line with our Special Educational Needs and Disabilities Policy [Special Educational Needs and Disabilities](#).

Collingwood College also adheres to the principals of and promotes anti-oppressive practice in line of the [United Nations Convention of the Rights of the Child](#) and the [Human Rights Act 1998](#).

## Policy Aims

The aims of this Policy are:

- To provide staff with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the College and ensure that safeguarding follows a whole College approach.
- Clarifying safeguarding expectations for members of the College community, staff, Governing Board, children, and their families.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in the built on shared values; that children are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice and are listened to.
- Supporting contextual safeguarding practice recognising that the College can be a location where harm can occur.
- Setting expectations to develop knowledge and skills within the College community (staff, students, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Working in partnership with children, parents/carers, and other agencies in the Surrey Safeguarding Children Partnership.

## Policy Principles and Values

- The welfare of the child is paramount.
- Maintain an attitude of "It could happen here".
- Maintain a "zero-tolerance" approach to sexual violence and sexual harassment.
- Children have a right to feel safe and secure, they cannot learn effectively unless they do so.

- All children have a right to be protected from harm and abuse.
- All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the college or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.
- Whilst the College will work openly with parents/carers as far as possible, it reserves the right to contact social care or the police, without notifying parents/carers, if this is believed to be in the child's best interests.
- We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach.

## Supporting Children

### **The College will support all children by:**

Providing a safe place and stability in the lives of children who have been abused or who are at risk of harm. The College recognises that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. Research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

Promoting a caring, safe and positive environment within the College.

Encouraging self-esteem and self-assertiveness, through the curriculum and through positive relationships within the College community.

Ensuring children are taught to understand and manage risk through Personal, Social, Health and Economic (PSHE) education and Relationship and Sex Education (RSE) and Health Education through all aspects of College life, including staying safe online.

Responding sympathetically to any requests for time out to deal with distress and/or anxiety.

Ensuring children are made aware of and have access to details of helplines, counselling, or other avenues of external support.

Liaising and working in partnership with support services and agencies involved in early help and the safeguarding of children. This includes Early Help Referrals to Social Care.

Notifying children's social care without delay if there is an immediate risk of significant harm.

Providing continued support to children about whom they have concerns and those who leave the College by ensuring that information is shared confidentially with the child's new setting. The College will ensure records are forwarded as a matter of priority and within statutory timescale.

The DSL will consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

The College recognises it plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

### **The College will:**

Establish and maintain an ethos where students feel safe and secure, are encouraged to talk and are always listened to.

Include regular consultations with students e.g. through questionnaires, participation in anti-bullying activity, asking children to report whether they feel safe in the College.

Ensure that all students know they can access a trained adult in the setting whom they can approach if they are worried or in difficulty.

Include safeguarding across the curriculum, including PSHE opportunities which equip students with the skills they need to keep themselves and other safe, including online and to know to whom they should turn to for help. It is also recognised that effective education will be tailored to the specific needs and vulnerabilities of individual students, including those who are victims of abuse, and children with special education needs or disabilities.

Provide preventative education by creating a culture of zero tolerance for sexism, misogyny/Misandry, homophobia, biphobia and sexual violence and sexual harassment.

Ensure all staff are aware of the College's guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

## Professional expectations, roles, and responsibilities

### Role of the College

The College will ensure that:

Details of the DSL and DDSL are available on the website, our newsletter, key offices and in reception areas.

The College operates safer recruitment procedures in line with KCSIE 2023 which includes statutory checks on the suitability of staff to work with children.

All staff receive information about the College safeguarding arrangements, the College's safeguarding statement, staff behaviour policy (code of conduct), Child Protection and Safeguarding Policy, the role and names of the Designated Safeguarding Lead (DSL) and their deputy Designated Safeguarding Lead (DDSL), and [Keeping children safe in education \(2023\)](#), Part 1 or the condensed version of it in annex A. This applies to the Governing Board in relation to part 2 of the same guidance.

All staff receive safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction in line with advice from [SSCP](#). Training is regularly updated as required, and at least annually to continue to provide them with relevant skills and knowledge to safeguard children effectively.

All members of staff are trained in and receive regular updates in online safety and reporting concerns.

All members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment.

All staff and Governors have regular safeguarding and child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.

The Child Protection and Safeguarding Policy is made available via the College website and a paper copy is available upon request for parents/carers.

All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures.

A coordinated offer of early help when additional needs of children are identified is provided and contribute to early help arrangements and inter-agency working and plans.

The College's lettings policy will seek to ensure the suitability of adults working with children on the College site at any time and ensure that any groups who use the College's premises have Safeguarding and Child Protection policies and procedures in place.

Community users organising activities for children are aware of the College's Child Protection and Safeguarding Policy, guidelines and procedures.

The name of the designated members of staff for safeguarding and child protection, the DSL and DDSL(s), are clearly advertised in the College.

## **All Staff will:**

Maintain an attitude of “It could happen here” with regards to safeguarding.

Understand that safeguarding is “everyone’s responsibility”.

Maintain a “zero-tolerance” approach to sexual violence and sexual harassment.

Read and understand Part 1 of statutory guidance KCSIE (2023). Those working directly with children will also read Annex B.

In addition to this all staff will be aware of the systems in place which support safeguarding including reading this Child Protection and Safeguarding Policy; the Management of Behaviour Policy; the Staff Code of Conduct; safeguarding response to children who go missing from education; and the role of the DSL.

Know who and how to contact the DSL and DDSL, the Chair of the Governing Board or the Governor responsible for safeguarding.

Be aware of indicators of abuse and neglect understanding that children can be at risk of harm inside and outside of the College, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

Be able to identify vulnerable learners and take action to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:

- who may need a social worker and may be experiencing abuse or neglect.
- requiring mental health support.
- may benefit from early help.
- where there is a radicalisation concern.
- where a crime may have been committed.

Provide a safe environment in which children can learn.

Establish and maintain an environment where students feel secure, are encouraged to talk and are listened to.

Ensure students know that there are adults in the College who they can approach if they are worried or have concerns.

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

Ensure only appropriately trained professionals attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Take immediate action if they have a mental health concern about a child that is also a safeguarding concern, following our Child Protection and Safeguarding Policy and procedures.

Plan opportunities within the curriculum for students to develop the skills they need to assess and manage risk appropriately and keep themselves safe.

Attend training in order to be aware of and alert to the signs of abuse and neglect.

Know how to respond to a child who discloses harm or abuse following training of ‘Working Together to Safeguard Children’ (2018), and ‘What to do if you are worried a child is being abused’ (2015).

Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day by CPOMS and in person. If the DSL is not contactable immediately a DDSL should be informed.

Be prepared to refer directly to the Children's Single Point of Access (C-SPA), and the Police if appropriate, if there is a risk of significant harm and the DSL or their DDSL is not available.

Follow the allegations procedures, as set out in this policy and KCSIE 2023, if the disclosure is an allegation against a member of staff, supply staff, volunteer or contactor.

Report low-level concerns (as defined in KCSIE 2023) about any member of staff/supply staff/volunteer or contractor to [insert your agreed internal procedures for reporting low level concerns in line with [Surrey LADO guidance](#)].

Provide support for children subject to early help, child in need or child protection and be involved where appropriate, in the implementation of individual plans to further safeguard vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child and/or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Notify the DSL or their DDSL of any child on a child protection plan or child in need plan who has unexplained absence.

Understand early help and be prepared to identify and support children who may benefit from early help. Liaise with other agencies that support children and provide early help.

Be aware that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected, and/or they may not recognise these experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.

Be mindful that the Teacher Standards states that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

## **The Governing Board**

All members of the Governing Board understand and fulfil their responsibilities to ensure that:

There is a whole College approach to safeguarding, involving everyone in the College and ensuring that safeguarding, and child protection are at the forefront and underpin all relevant aspects of process and policy development.

A nominated governor for safeguarding is identified.

The Governing Board should ensure that all members receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the College are effective and support the delivery of a robust whole College approach to safeguarding. Training should be regularly updated.

The student's wishes and feelings are considered when determining what action to take and what services to provide.

The College has effective safeguarding policies and procedures including a Child Protection and Safeguarding Policy, a Staff Code of Conduct, a Management of Behaviour Policy and a response to children who go missing from education.

Policies are consistent with SSCP and statutory requirements, are reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt and that the Child Protection and Safeguarding Policy is available on the College website.

The SSCP is informed in line with local requirements about the discharge of duties via the Biennial (s 157 s 175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via PHEW to Surrey County Council.

Recruitment, selection and induction follow safer recruitment practice including all appropriate checks.

Staff have been trained appropriately and this is updated in line with guidance and all staff have read KCSIE (2023) part 1 or Annex B (depending on their role in the College) Additionally, there are mechanisms in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.

As part of the requirement for staff to undergo regular updated safeguarding training, including online safety and the requirement to ensure children are taught about safeguarding, is integrated, aligned, and considered as part of the whole College safeguarding approach and wider staff training and curriculum planning.

Considering the above training requirements, the Governing Board has regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all children.

All staff including temporary staff/supply staff, volunteers and contractors are provided with the College's Child Protection and Safeguarding Policy and if applicable the Staff Code of Conduct.

A proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.

The College has procedures in place for dealing with allegations against all staff (including the Principal), volunteers and contractors and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have, had they not resigned.

Policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold or low-level concerns as defined in KCSIE 2023.

A member of the senior leadership team has been appointed by the Governing Board as the DSL who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.

That on appointment, the DSL and DDSL undertake interagency training (SSCP Foundation Modules 1 and 2) and also initially undertake DSL 'New to Role' with 'Refresher' training at least every two years as well as attending DSL network events, to refresh knowledge and skills.

Students are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through PSHE and RSE.

Alongside the College, Governors will regularly review the effectiveness of filtering and monitoring systems in place to safeguard students online.

The leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

The College will comply with DfE and the Surrey County Council Policy Guidance for Safeguarding Children Missing Education and Education Other Than at School.

Clear systems and processes are in place for identifying possible mental health concerns, including routes to escalate and clear referral and accountability systems.

Safeguarding and child protection files are maintained as set out in KCSIE 2023 Annex C.

Enhanced DBS checks (without barred list checks unless the Governor is also a volunteer at the College) are in place for all Governors.

Section 128 checks are undertaken as defined in KCSIE 2023.

Where the College hires or rents out facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.

## **The Principal:**

In addition to the role and responsibilities of all staff the Principal will ensure that:

The College fully contributes to inter-agency working in line with Working Together to Safeguard Children (2018) guidance.

The Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff.

The College has appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place.

The College's staff have appropriate knowledge of KCSIE (2023) part 5.

All students are supported to report concerns about harmful sexual behaviour freely. That concerns are taken seriously and dealt with swiftly and appropriately, and they are confident that this is the case. Comprehensive records of all allegations are kept.

All staff are aware of the role of the DSL, including the identity of the DSL and any DDSL's.

Sufficient time, training, support, funding, resources, including cover arrangements where necessary, is allocated to the DSL to carry out their role effectively, including the provision of advice and support to College staff on safeguarding and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.

Opportunities are provided for a co-ordinated offer of early help when additional needs of children are identified.

That DDSLs are trained to the same standard as the DSL and the role is explicit in their job description.

Adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities.

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

Child-centred systems and processes are in place for children to express their views and give feedback.

All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.

Students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.

That allegations or concerns against staff and other adults are dealt with in accordance with guidance from the Department for Education (DfE), SSCP and Surrey County Council (SCC).

That statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.

Record low-level concerns in cases which concern a member of staff/supply staff/contractor or a volunteer. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

## The Designated Safeguarding Lead:

In addition to the role and responsibilities of all staff the DSL will:

Hold the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems in place) in the college, this responsibility is not able to be delegated.

Liaise with the Surrey Country Council work in partnership with other agencies in line with Working Together to Safeguard Children (2018).

Where necessary contact Surrey's Child Protection Consultation Line for advice and support (0300 470 9100 option 3).

Manage and submit a Request for Support Form for a student if there are concerns about suspected harm or abuse, to the C-SPA, and act as a point of contact and support for College staff. Requests for support should be sent securely by email to [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) using the [Request for Support Form](#) urgent referrals should be made by telephone 0300 470 9100 or 03311 435554.

Report concerns that a student may be at risk of radicalisation or involvement in terrorism, use the [Prevent referral form](#) to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) . If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 07795 043842 or 01865 555618 and ask to speak to the Prevent Supervisor for Surrey. The DfE has also set up a dedicated telephone helpline for staff and Governors to raise concerns around Prevent (020 7340 7264).

Refer cases where a crime may have been committed to the Police as required. NB: NPCC- [When to call the police](#) should help DSLs understand when they should consider calling the Police and what to expect when they do.

Liaise with the "case manager" and Local Authority Designated Officer (LADO) for child protection concerns in cases which concern a member of staff/supply staff/contractor or a volunteer.

Follow relevant DfE guidance and KCSIE 2023 on 'Child on Child abuse' when a concern is raised that there is an allegation of a child abusing another child within the college.

When there has been a report of sexual violence, make an immediate risk and needs assessment. Additionally, where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and will be put in place as required.

Be available during term time (during College hours) for staff in the College to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the Senior Leadership Team for any out of hours/term activities.

Act as a source of support and expertise in carrying out safeguarding duties for the whole College community.

Ensure that the names of the DSL and DDSL, are clearly advertised, with a statement explaining the College's role in referring and monitoring cases of suspected abuse.

Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.

Access training and support to ensure they have the knowledge and skills required to carry out the role.

Have a secure working knowledge of SSCP procedures and understand the assessment process for providing early help and statutory intervention, in line with [Surrey's Effective Family Resilience levels of need document](#).

Have a clear understanding of access and referral to the local early help offer and will support and advise members of staff where early help intervention is appropriate.

Have a working knowledge of how Surrey Country Council conduct an initial child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.

Understand the lasting impact that adversity and trauma can have, including on the children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.

Understand and support the College's delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation.

Liaise with College staff (especially pastoral support, behaviour leads, health colleagues and the SENDCo) on matters of safety and safeguarding and consult Surrey's Effective Family Resilience document to inform decision making and liaison with relevant agencies.

Be alert to the specific needs of children in need, those with Special Educational Needs and Disability (SEND) and young carers.

Understand the risks associated with online activity and be confident that they have the up-to-date knowledge and capability to keep children safe whilst they are online at the College; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.

DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually.

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 children's attendance, engagement and achievement at the College.

Keep up to date, detailed, accurate records (either written or using appropriate secure online software), that include all concerns about a child even if there is no need to make an immediate referral and record the rationale for decisions made and action taken.

Ensure that an indication of the existence of the additional safeguarding/child protection file is marked on the child's main file record.

Ensure that when a child transfers setting (including in-year), their safeguarding/child protection file is passed to the new setting as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

If the transit method requires that a copy of the safeguarding/child protection file is retained until such a time that the new setting acknowledges receipt of the original file, the copy should be securely destroyed on confirmation of receipt.

Ensure that where a child transfers to a setting and is on a child protection plan, child in need plan or is a child looked after, their information is passed to the new setting immediately and that the child's social worker is informed. In addition, consideration should be given to a multi-agency settings transition meeting if the case is complex or on-going.

Ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting.

Report to the Principal any significant issues for example, use of [Surrey's FaST Resolution Process](#) enquiries under section 47 of the Children Act 1989 and Police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the [Statutory guidance - PACE Code C 2019](#).

Ensure that the case holding social worker is informed of any child currently with a child protection plan who is absent without explanation.

Organise safeguarding and child protection induction, regularly updated training and a minimum of annual updates (including online safety) for all college staff, keep a record of attendance and address any absences.

Ensure each member of staff has access to, and understands, the College's Child Protection and Safeguarding Policy procedures, especially new and part-time staff.

Ensure that in collaboration with the leadership and Governing Board, the Child Protection and Safeguarding Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.

Ensure that the Child Protection and Safeguarding Policy is available publicly and that parents/carers know that referrals about suspected abuse or neglect may be made and the role of the College in this.

Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.

Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and leadership staff.

Establish and maintain links with the SSCP to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.

Contribute to and provide, with the Principal and Chair of Governors, the biennial (s157 s175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via PHEW to Surrey County Council.

(Duties are further outlined in KCSIE (2023, Annex C)

## **The Deputy Designated Safeguarding Lead(s):**

In addition to the role and responsibilities of all staff the DDSL(s) will:

Be trained to the same standard as the DSL and the role is explicit in their job description.

Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.

In the absence of the DSL, carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the DDSL will assume all of the functions of the DSL.

## **Confidentiality, Sharing and Withholding Information**

All matters relating to safeguarding and child protection will be treated as confidential and only shared as per the ['Information Sharing Advice for Practitioners' \(DfE 2018\) guidance](#). The College will refer to the guidance in the [Data protection: toolkit for schools](#) to support college with data protection activity, including compliance with General Data Protection Regulation (GDPR).

Information will be shared with staff within the College who 'need to know'.

Relevant staff have due regard to GDPR principles which allow them to share (and withhold) information.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the [Data Protection Act 1998](#) and GDPR are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff will always endeavour to gain parent/carers consent to refer a child to social care unless to do so could put the child at greater risk of harm or impede a criminal investigation.

## Reporting and Responding to Safeguarding Concerns

The following procedures apply to all staff working in the College and will be covered in training to enable staff to understand their role and responsibility.

The aim of the procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a student is being harmed or abused or is at risk of harm or abuse.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:

Make an initial record of the information related to the concern as soon as possible.

On CPOMS staff should detail all aspects of the disclosure including details of (should access to CPOMS not be immediate written notes should include):

- Date
- Time
- Place
- Who was present
- Context
- Details of disclosure/concern (using the student's words)
- Demeanour/non-verbal behaviours of the student
- Child's voice
- Any injuries (using a body map to record these)
- Rationale for decision making
- Actions taken

Report it to the DSL immediately.

The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.

The records must be signed and dated if written notes. CPOMS will automatically time and date stamp electronic communication.

In the absence of the DSL or DDSL, all staff must be prepared to and know how to refer directly to C-SPA (and the Police if appropriate) if there is the potential for immediate significant harm or contact the consultation line at the C-SPA for support and advice.

Following a report of concerns the DSL must:

Using the Effective Family Resilience and Levels of Need document decide whether or not there are sufficient grounds for suspecting harm, in which case a request for support must be made to the C-SPA and the Police if it is appropriate.

The College should try to discuss any concerns about a child's welfare with the parent/carer and where possible obtain their agreement before making a referral to the C-SPA. However, this should only be done when:

- it will not place the child at increased risk
- or sexual/organised abuse is suspected
- or the fabrication of an illness is suspected
- or where the discussion could impede a Police investigation or Social Work enquiry

Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or the Police whether the parents/carers should be told about the referral and, if so, when and by whom. This is important in cases where the Police may need to conduct a criminal investigation. The child's views should also be considered.

If it is suspected that a child is suffering, or is likely to suffer, harm or abuse the DSL must contact the C-SPA. If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA consultation line to discuss concerns.

When a child needs urgent medical attention and there is suspicion of abuse the DSL should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the C-SPA will take and about informing the parents/carers, remembering that parents/carers should normally be informed that a child requires urgent hospital attention.

The exception to this process will be in those cases of known FGM where there is a [mandatory reporting duty](#) for the teacher to report directly to the Police where they either:

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

The DSL should also be made aware.

## Dealing with safeguarding concerns

### All staff:

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child and/or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable. All staff have the right to make a referral to the C-SPA or Police directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on the College premises at the time and have concerns about sending a child home.

### Guiding principles:

- Receive or Recognise
- Reassure
- Respond
- Report
- Record
- Remember
- Refer if applicable
- Review (by the DSL)

### What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information, they should seek it out.

If they believe that the concern has not been acted upon appropriately, they should inform the Principal or Safeguarding Governor or contact the C-SPA for advice.

## Safeguarding Concerns and Allegations made about Staff, including supply teachers, volunteer and contractors

[Surrey's LADO procedure](#) will be followed where it is alleged that anyone working in the College that provides education for children under 18 years of age, including supply staff, volunteers and contractors or another adult who works with children has:

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

The last bullet point above includes behaviour that may have happened outside of the College, that might make an individual unsuitable to work with children, this is known as transferable risk.

The College may also receive an allegation relating to an incident that happened when an individual or organisation was using the site for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities).

In dealing with allegations or concerns against an adult, staff must without delay:

Report any concerns to the Principal immediately.

If an allegation is made against the Principal, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly.

There may be situations when the Principal, Chair of Governor will want to involve the Police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

Once an allegation has been received by the Principal, Chair of Governors they will contact the LADO (as part of their mandatory duty) on 0300123 1650 option 3 LADO or Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk) immediately and before taking any action or investigation.

Following consultation with the LADO inform the parents/carers of the allegation unless there is a good reason not to.

In liaison with the LADO, the College will determine how to proceed and if necessary, the LADO will refer the matter to Social Care and/or the Police.

If the matter is investigated internally, the LADO will advise the college to seek guidance in following procedures set out in part 4 of KCSIE (2023) and the SSCP procedures.

### Low-level concerns

The term low-level concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the College may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

The purpose of reporting low-level concerns is to create and embed a culture of openness, trust and transparency in which the College's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

The College creates an environment where staff are encouraged and feel confident to self-refer where they have found themselves in a situation.

Reports should be made to the DSL in a timely manner. If the DSL has any doubt as to whether the information which has been shared about the individual as a low-level concern in fact meets the harm threshold, they will consult with the LADO.

## What is child abuse?

The following definitions are taken from Working Together to Safeguard Children (2018). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour-based violence, forced marriage or female genital mutilation. To support the local context, all staff have access to Surrey's [Effective Family Resilience and Levels of Need document](#).

### Forms of abuse and neglect

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing 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 or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child 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 children frequently to 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, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

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

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The College uses the [Graded Care Profile 2](#) tool to support better identification and intervention in cases of neglect. The Surrey [Neglect Risk Assessment Tool](#) is used to support with the initial identification of neglect.

Further information on indicators of abuse can be accessed via [NSPCC](#).

## Sexual Violence and Sexual Harassment Between Children in the College

### Child-on-Child Abuse

Sexual violence and sexual harassment can occur between children of any age and sex. It can occur through a single child or a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will, in all likelihood, adversely affect their education attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adults, and College staff are supported and protected as appropriate.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying) abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse');
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) [UKCIS guidance: Sharing nudes and semi-nudes advice for education settings](#) working with children and young people;
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and,
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

*See page Appendix 1 on page 32 for detailed definitions.*

We believe that all students have a right to attend our College and learn in a safe environment. They should be free from harm by adults and other students at Collingwood College.

We recognise that children are capable of abusing other children and their peers and this will be dealt with under our Child Protection and Safeguarding Policy and in line with KCSiE (2023).

We are clear that sexual violence and sexual harassment is not acceptable.

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

- Making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It will never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". We believe that failure to do so can lead to a culture

of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

- Recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- Challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. We believe that dismissing or tolerating such behaviours risks normalising them.

## **Prevention**

- Taking a whole College approach to safeguarding and child protection.
- Providing training to staff.
- Providing a clear set of values and standards, underpinned by the College's Management of Behaviour Policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum.
- Providing the students with the capacity to report electronically as well as in person via the College's ReportIt@ email.
- Engaging with specialist support and interventions.
- Responding robustly to reports of sexual violence and sexual harassment.

Children making any report of sexual violence or sexual harassment including "upskirting" (The Voyeurism Offences Act 2019) will be taken seriously, kept safe and be well supported.

If the report includes an online element staff will be mindful of the [Searching, screening and confiscation at school](#) guidance.

The key consideration is for staff not to view or forward illegal images of a child. The guidance provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

## **Risk Assessment**

Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis.

The risk assessment will consider;

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any sanctions.
- All other children at the College.
- The victim and the alleged perpetrator sharing classes and space at College.
- The risk assessment will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the College's approach to supporting and protecting children.

## **Action:**

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the College should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

The DSL will consider:

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.

- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- That sexual violence and sexual harassment can take place within intimate personal relationships between children.
- Importance of understanding intra familiar harms and any necessary support for siblings following incidents
- Ongoing risks to victim, other children, adult students, or staff.
- Other related issues or wider context.

### **Confidentiality:**

The victim may ask the College not to tell anyone about the sexual violence or sexual harassment. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. The DSL should consider:

- Parents or carers should normally be informed (unless this would put the victim at greater risk);
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and,
- Rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

### **Options:**

- Manage internally
- Early help intervention
- Request for support to the C-SPA
- Report to the Police (generally in parallel with a request for support to the C-SPA)

All concerns, discussions, decisions and reasons for decision will be recorded electronically on CPOMS.

### **Ongoing Response:**

- The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and social care.
- Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, the College should be aware of anonymity, witness support, and the criminal process in general so it can offer support and act appropriately.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.
- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on the college premises and on transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the College will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same setting would seriously harm the education or welfare of the victim (and potentially themselves and other children).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the College will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the College, the Principal should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on College premises and transport. The

nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

- The victim, alleged perpetrator and any other children and adults affected will receive appropriate support and safeguards on a case-by-case basis.
- The College will take any disciplinary action against the alleged perpetrator in accordance with the College Management of Behaviour Policy.
- The College recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.
- The College will consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- The College recognises that children who have experienced sexual violence display a wide range of responses to their experiences including clear signs of trauma, physical and emotional responses, or no overt signs at all.

### **Physical Abuse**

While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from children to children can also be abusive.

These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the Police.

The principles from the Anti-Bullying Policy will be applied in these cases, with recognition that any Police investigation will need to take priority.

## **Harmful Sexual Behaviour (HSB)**

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB will be considered in a child protection context.

The College's response to HSB:

The [Brook Traffic Light Tool](#) uses a traffic light system to categorise the sexual behaviours of children, it can be used to help professionals and key staff are aware, have been trained in it's use and use the tool. It helps:

- Make decisions about safeguarding children and young people
- Assess and respond appropriately to sexual behaviour in children and young people
- Understand healthy sexual development and distinguish it from harmful behaviour

By categorising sexual behaviours, the College can work with other agencies to the same standardised criteria when making decisions and can protect children with a multi-agency approach.

The College recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

## **Anti-Bullying/Cyberbullying**

The College's policy on anti-bullying is set out in the [Anti-Bullying](#) Policy which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying).

We keep a record of known bullying incidents. An overview is provided to the Governing Board through its Student Welfare and Community Committee. All staff are aware that children with SEND and/or children who

identify as Lesbian, Gay, Bisexual, Transgender, Queer or Questioning (LGBTQ+) are more susceptible to being bullied/victims of child abuse.

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern. If the anti-bullying procedures are seen to be ineffective, the Principal and the DSL will also consider child protection procedures.

PSHE education regularly provides opportunities for children to understand bullying is wrong, its impact and how to deal with it.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help settings counter homophobic, bi-phobic and transphobic bullying and abuse.

## E Safety/Cybercrime

The College has measures and guidelines which empowers us to protect and educate students and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The College also has a clear policy on the use of mobile and smart technology (including wearable technology such as smart watches).

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk, content, contact, conduct and commerce.

Students are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The College's DSL will also assume responsibility for online safety.

The College will follow the guidance around [harmful online challenges and online hoaxes](#) when supporting students and sharing information with parents/carers.

Students with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a student in this area, the DSL will consider a referral into the [Cyber Choices](#) programme.

This programme aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

## Racist Incidents

Our policy on racist incidents is set out separately and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

## Radicalisation, Extremism and Terrorism

[The Prevent Duty for England and Wales \(2015\)](#) under section 26 of the Counter Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

Extremism is defined as ‘the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces’.

Radicalisation refers to ‘the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups’.

Terrorism is ‘an action that endangers or causes serious violence to a person/people;; causes serious damage to property; or seriously interferes with an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.’

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

The College is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the DfE guidance for settings and childcare providers on preventing children and young people from being drawn into terrorism.

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children’s behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a [Prevent Referral](#) .

The DSL should report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the [Prevent referral form](#) to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) .

If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101.

To speak to the Prevent Supervisor for Surrey call 07795043842.

There is a dedicated telephone helpline 0800 0113764 for staff and the Governing Board to raise concerns around Prevent.

College staff will receive regular advice and guidance to help identify early signs of radicalisation and extremism.

Opportunities are provided in the curriculum to enable children to discuss issues of religion, ethnicity and culture and the College follows the [Promoting fundamental British values through SMSC](#).

The Governing Board, the Principal and the DSL will assess the level of risk within the College and put actions in place to reduce that risk. Risk assessment may include due diligence checks for external speakers and private hire of facilities, anti-bullying policy and other issues specific to the College’s profile, community and philosophy.

Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised.

Further information and a list of such indicators can be found at [Managing Risk of Radicalisation in your Education Setting](#)

## Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

[Domestic Abuse Act](#) received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

The College is enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey Domestic Abuse Service and Surrey settings. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSL in the College before the child or children arrive at the College the following day. This ensures that key staff have up to date relevant information about the child’s circumstances and can enable immediate support to be put in place, according to the child’s needs.

## Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. The DSL is aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

## Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence and may happen without the child’s immediate knowledge for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL.

The College is aware there is a clear link between regular non-attendance and CSE. Staff will consider a child to be at potential CSE risk in the case of regular non-attendance at and make reasonable enquiries with the child and parents/carers to assess this risk.

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between children outside of these environments. All staff, but especially the DSL, will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

In all cases if the DSL identifies any level of concern the DSL should contact the C-SPA and if a child is in immediate danger the Police should be called on 999.

The College is aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

The College includes the risks of sexual exploitation in the PSHE and RSE curriculum.

## **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. Children are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt.

Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. The DSL will then contact the C-SPA and if there is concern about a child’s immediate safety, the Police will be contacted on 999.

The College is aware there is a clear link between regular non-attendance in education and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at College and make reasonable enquiries with the child and parents/carers to assess this risk.

## **Serious Violence**

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- Increased absence from College;
- A change in friendships or relationships with older individuals or groups;
- A significant decline in performance;
- Signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries;
- Unexplained gifts or new possessions could also indicate that students have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff are aware that violence can often peak in the house just before and after the children attend the College which includes travelling to and from College.

## **Modern Slavery**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

## Female Genital Mutilation (FGM)

FGM is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. [A mandatory reporting duty](#), requires teachers to report directly and immediately to the Police 101 where they either:

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

The duty applies to all persons who are employed or engaged to carry out 'teaching work' whether or not they have qualified teacher status.

**The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the DSL; however, the DSL should be informed.**

College staff are trained to be aware of risk indicators of FGM.

Concerns about FGM outside of the mandatory reporting duty should be reported using the College's Safeguarding and Child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female children about going on a long holiday during the summer holiday or just prior.

There should also be consideration of potential risk to other girls in the family and the wider community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the Police by calling 999.

**There are no circumstances in which a member of staff should examine a girl.**

## Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual, and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. In addition, since February 2023, it is also a crime to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

College staff should never attempt to intervene directly as a college or through a third party. Contact should be made with the C-SPA and/or the Forced Marriage Unit 020 7008 0151.

## So-called 'Honour'-based abuse (HBA)

HBA can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

HBA might be committed against people who:

- Become involved with a boyfriend or girlfriend from a different culture or religion.

- Want to get out of an arranged marriage; become involved with a boyfriend or girlfriend from a different culture or religion.
- Want to get out of a forced marriage.
- Wear clothes or take part in activities that might not be considered traditional within a particular culture

It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

### **One Chance Rule**

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBA. Staff should recognise they may only have one chance' to speak to a child who is a potential victim and have just one chance to save a life.

The College is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

## **Private Fostering Arrangements**

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

Looked After Children by the local authority or those who are placed in residential settings, children's homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures and children may be privately fostered at any age.

The College recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care immediately. However, where a member of staff becomes aware that a child may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify the C-SPA immediately.

## **Looked After Children and Previously Looked After Children**

The most common reason for children becoming looked after is because of abuse and/or neglect.

Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

The designated teacher and Governor for looked after children will have the appropriate level of training to equip them with the knowledge and skills to undertake their role.

The designated teacher will work with Surrey's Head of virtual School for both looked after children and previously looked after children.

## Children with Special Educational Needs and Disabilities or Health Issues

Children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children, the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in settings or the consequences of doing so

Any reports of abuse will require close liaison with the DSL and the SENDCO. The College will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

## Children Absent from Education

All students are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude, and any SEND they may have.

The College recognises that when children are absent from education, this can be a vital warning sign of a range of safeguarding possibilities. They are also at significant risk of underachieving, being victims of abuse and harm, exploitation, radicalisation, and not being in education, employment or training (NEET) later in life.

Where possible the College will hold more than one emergency contact number for each child.

The College will ensure that there is a record of joiners and leavers as defined in [The Education \(Pupil Registration\) \(England\) 2006 \(amended 2016\)](#).

When removing a child's name, the College will notify Surrey County Council of: (a) the full name of the child, (b) the full name and address of any parent with whom the child normally resides, (c) at least one telephone number of the parent, (d) the child's future address and destination setting, if applicable, and (e) the ground in regulation 8 under which the child's name is to be removed from the College register.

The College will make reasonable enquiries to establish the whereabouts of a child jointly with the Local Authority, before deleting the child's name from the setting register if the deletion is under regulation 8(1), sub-paragraphs (f) (iii) and (h) (iii) of [The Education \(Pupil Registration\) \(England\) 2006 \(amended 2016\)](#).

The College will:

- Enter children on the admissions register on the first day on which the College has agreed, or has been notified, that the child will attend the College.
- Notify Surrey County Council within five days of adding a child's name to the admission register. The notification must include all the details contained in the admission register for the new child.
- Monitor each child's attendance through their daily register and follow Surrey County Council procedure in cases of unauthorised absence.
- Remove a child's name from the admissions register on the date that the child leaves the College.
- Notify Surrey County Council when they are about to remove a child's name from their register under any of the fifteen grounds listed in the regulations, no later than the date that the child's name is due to be removed.

Where parents/carers notify the College, in writing, of their intention to Electively Home Educate (EHE) the College will forward a copy of the letter to the Surrey County Council Inclusion Team.

Where parents/carers orally indicate that they intend to withdraw their child to EHE and no letter has been received, the College will not remove the child from roll and will notify the Inclusion Team at the earliest opportunity.

## **Pupils Missing Out on Education (PMOOE)**

Most children engage positively with their education and attend regularly. However, to flourish, some students require an alternative education provision or may require a modified timetable to support a return to full time education provision. It is recognised that students accessing alternative provision, or a reduced/modified timetable may have additional vulnerabilities. Ofsted refer to these as PMOOE because they are not accessing their education in a setting in the 'usual way'.

The College will gain consent (if required in statute) from parents/carers to put in place alternative provision and/or a reduced or modified timetable.

The College will ensure that parents/carers (and the Local Authority where the child has an Education Health Care Plan (EHCP)) are given clear information about alternative provision placements and reduced/modified timetables: why, when, where, and how they will be reviewed.

The College will keep the placement and timetable under review and involve parents/carers in the review. Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the child is benefitting from it.

The College will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child. The college continues to be responsible for the safeguarding of that pupil. We will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment,

The College will comply with regular data returns requested by Surrey County Council, regarding all children, of statutory age, attending alternative provision and/or on a reduced/modified timetable.

The Senior Leadership Team will report to the Governing Board information regarding the use and effectiveness of alternative provision and modified/reduced timetables. The College will also report to Governors any formal direction of a child to alternative provision to improve behaviour.

## **Attendance and Behaviour**

Additional policies and procedures are in place regarding College attendance and behaviour.

The College recognises that students being absent, particularly repeatedly and/or for prolonged periods and exclusion from may be indicators of abuse and neglect, including the exploitation of them. The DSL will regularly liaise with members of staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

The College will work in partnership with Surrey Police and other partners for reporting children that go missing from the site during the college day. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

## **Restrictive Physical Intervention**

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is at immediate risk of harming themselves or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained in Crisis Prevention Institute (CPI) or Positive Touch Training and other de-escalation techniques.

Staff understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection and/or disciplinary procedures.

We recognise that sometimes touch is appropriate in the context of working with children, and all staff have been given safe practice guidance to ensure they are clear about their professional boundaries.

When applying disciplinary measures such as physical intervention or isolation for children with SEND the College will consider the risks, given the additional vulnerabilities of these children.

## Whistleblowing

We recognise that students cannot be expected to raise concerns in an environment where staff fail to do so.

All staff, including temporary staff/supply staff and volunteers, should be aware of their duty to raise concerns, where they exist, about the management of safeguarding and child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the College's safeguarding arrangements.

If it becomes necessary to consult outside the College, they should speak in the first instance, to the Area Schools Officer or LADO in accordance with the Whistleblowing Policy.

Staff are encouraged to use an external, independent and confidential service provided by Navex Global, who can be contacted on their freephone helpline number 0800 069 8180 and through the [Navex Global web pages](#)

[The NSPCC whistleblowing helpline](#) is also available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by the College. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Whistleblowing regarding the Principal should be made to the Chair of the Governing Board whose contact details should be available to staff.

### Links with other College policies and guidance

Anti-Bullying Policy  
Child Exploitation  
Complaints Procedure  
Curriculum Policy  
Drugs Policy  
Equality Policy  
E-Safety, including staff use of mobile phones  
Health, Safety and Welfare Policy  
Looked after Children and Previously Looked after Children  
Management of Allegations Policy  
Management of Behaviour Policy  
Physical Intervention Procedure  
PSHE Policy  
Prevent - Radicalisation and Extremism  
Recruitment and Selection Guidance Policy  
Risk Assessment  
School Attendance Policy  
Relationships and Sex Education Policy  
Sexual Violence and Sexual Harassment  
Single Equality  
Staff Behaviour Policy / Code of Conduct  
Supporting Student with Medical Needs Policy  
Teaching and Learning Policy  
Transgender Policy  
Whistleblowing Policy

## **Additional Resources**

[Surrey Safeguarding Children Partnership webpages](#)

[Surrey Education Services \(surreycc.gov.uk\)](#) – Education Safeguarding Resources Hub

[Graded Care Profile 2](#)

[NSPCC | The UK children's charity | NSPCC](#)

[CEOP ThinkuKnow webpages](#)

[Anti Bullying Alliance webpages](#)

[Childnet International](#)

[Safer Internet Centre webpages](#)

[Contextual Safeguarding Network webpages](#)

[Lucy Faithfull Foundation webpages](#)

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

## Appendix 1: Safer Recruitment

# Safer Recruitment Policy

### Recruitment and selection process

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

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

#### Advertising

When advertising roles, we will make clear:

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

#### Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

#### Shortlisting

Our shortlisting process will involve at least 2 people and will:

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

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

## Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

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

## Interview and selection

When interviewing candidates, we will:

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

## Pre-appointment vetting checks

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

### New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
- For all staff, including teaching positions: [criminal records checks for overseas applicants](#)

- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state

\* Management positions are most likely to include, but are not limited to, Principals, Vice Principals and senior/assistant Principals.

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

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

#### **Existing staff**

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

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

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

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

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

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

#### **Contractors**

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

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the College.

#### **Trainee/student teachers**

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

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

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

### **Governors**

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

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

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

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

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

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

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

### **Students staying with host families**

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

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

## Appendix 2: Allegations of abuse made against staff

# Allegations against staff (including low-level concerns) Policy

### Section 1: allegations that may meet the harms threshold

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

- . Behaved in a way that has harmed a child, or may have harmed a child, and/or
- . Possibly committed a criminal offence against or related to a child, and/or
- . Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- . Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of College

If we are in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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

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

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

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

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

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

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

If in doubt, the case manager will seek views from the College's personnel advisor and the designated officer at the local authority, as well as the police and Surrey Children's Services where they have been involved.

### Definitions for outcomes of allegation investigations

- . **Substantiated:** there is sufficient evidence to prove the allegation
- . **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- . **False:** there is sufficient evidence to disprove the allegation

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

## Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority (LADO) This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or Surrey Children's Services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or Surrey Children's Services, where necessary). Where the police and/or Surrey Children's Services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the College is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or Surrey Children's Services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the College and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in College and/or liaise with the police and/or Surrey Children's Services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Colleagues will be steered to support networks such as union representatives, or another colleague and/or human resources support networks for example for welfare counselling or medical advice
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with Surrey Children's Services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the College is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the College will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the College's disciplinary process, should this be required at a later point.

### **Additional considerations for supply teachers and all contracted staff**

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

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

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

## **Timescales**

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

## **Specific actions**

### **Action following a criminal investigation or prosecution**

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

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

If the allegation is substantiated and the individual is dismissed or the College ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the College will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the College will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### **Individuals returning to work after suspension**

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

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

## **Unsubstantiated, unfounded, false or malicious reports**

If a report is:

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

## **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

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

## **Confidentiality and information sharing**

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

The case manager will take advice from the LADO, police and Surrey Children's Services, as appropriate, to agree:

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

## **Record-keeping**

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

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

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

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

In these cases, the College will provide a copy to the individual, in agreement with Surrey Children's Services or the police as appropriate.

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

## **References**

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

- . Include substantiated allegations, provided that the information is factual and does not include opinions

## Learning lessons

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

This will include consideration of (as applicable):

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

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

## Non-recent allegations

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

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

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

## Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

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

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

## Definition of low-level concerns

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

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

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

- . Being overly friendly with children
- . Having favourites
- . Taking photographs of children on their mobile phone
- . Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- . Humiliating students

## Sharing low-level concerns

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

We will create this culture by:

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

The Principal and DSL will adopt an open-door policy in order to encourage the sharing of low-level concerns.

## Responding to low-level concerns

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

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

The Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the College's staff code of conduct. The Principal will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Low-level concerns can be reported in person – verbally (a written, signed and dated recording should be kept), via the College ReportIt@ email account or via CPOMS.

Keeping Children Safe in Education also links to this report for more information [\[Developing and implementing a low-level concerns policy: A guide for organisations which work with children\]](#)

## Record keeping

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

Records will be:

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

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

## References

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

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

## Appendix 3

### Sexual violence

It is important that settings are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of the educational setting. When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his 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: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his 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: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE- Settings should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes 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. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

#### What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#).

### Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;

- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. The College should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim;
- displaying pictures, photos or drawings of a sexual nature;
- upskirting (this is a criminal offence), and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)
- sharing of unwanted explicit content;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats, and
- coercing others into sharing images of themselves or performing acts they're not comfortable with online.

It is important that College staff consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

## Appendix 4:

### Safeguarding Rapid Response



## Safeguarding Rapid Response

### 1. Recognise

Understand that the reality is that things do and will happen at Collingwood however shocking it may seem. We must assume they occur.

### 2. Recording and Reporting

Create a new incident on CPOMS by typing student name in quick search and then clicking on new incident. Create the log and then click the appropriate category.

Unless this is a specific issue relating to behaviour or attendance most cases will require clicking 'Cause for Concern' and then the sub-category of your choice.

If this came through a communication also tick what form this came in.

If a student is already known to have access to support through social care in the guise of CIN the plan/ TAF/CP plan it is vital the safeguarding box is also ticked.

### 3. Referral Process

Ensure that you assign the incident to the right person. This should always be the Year Manager unless you believe there is an imminent danger to the individual or a crime has been committed. In this instance you would assign it to Jamie Cleary and/or Jess Hawkmore. Alert other key staff—if you are unsure refer to overleaf. If you are unsure whether this has been picked up please chase in person. Adopt a same-day rule and do not leave overnight.

### 4. Response

The safeguarding team will respond appropriately. They may come to you for further information. They will respond appropriately sometimes utilising outside agencies for support.

### 5. Reflections

It is vital that we all reflect on the situation to seek best practice and those reflections shared with the safeguarding team.

**CHILD PROTECTION AND SAFEGUARDING on CPOMS**

**Always assign to Year Manager (PL) in first instance**

**Alert (copy in) PA and anyone else who may be interested/involved with that student, e.g. if you know Ramon has been involved with the family, Nic Everson if they are a looked after child, etc.**

**Alert (copy in) Jamie or Jess if it is level 2 or above, or if you feel it needs them to overview. Level 2 constitutes either social care involvement or a potential immediate risk to the student. Always alert the YM/PA to these situations too.**

**If in doubt, copy DSL/Deputy DSL in.**

Year Managers (PL):		Pastoral Assistants (PA):
Year 7	Harry Green	Shim Amin
Year 8	Paul Andrews	Jade Cousins
Year 9	Sam Goggin	Rianne Dillon
Year 10	Kate Robinson	Sue Lee
Year 11	Suzi Gulliford	Charlie Taylor

**Designated Child Protection and Safeguarding staff include:**

- MR J CLEARY – DESIGNATED SAFEGUARDING LEAD (DSL)
- Mrs J Hawkemore – Deputy DSL
- Mr P Jarmyn - Deputy DSL
- Mrs D Rourke – Deputy DSL
- Mrs J Jennings – Deputy DSL
- Mrs C Chapman – Deputy DSL
- Ms N Akbar – Deputy DSL
- Mrs N Woolven - Assistant Inclusion Centre Manager/Deputy DSL
- Mrs N Everson – Designated Teacher for Looked After Children/Deputy DSL
- Mrs L Edwards – Progress Leader KS3
- Mr R San Emeterio – Progress Leader KS4
- Mr H Green - Year Manager (7)
- Mr P Andrews – Year Manager (8)
- Mrs S Goggin – Year Manager (9)
- Miss K Robinson - Year Manager (10)
- Miss S Gulliford – Year Manager (11)
- Miss E Hope – Student Support Officer

## Appendix 5:

### Brook Sexualised Behaviour Tool

#### Behaviours: age 5 to 9 and 9 to 13

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

##### What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

##### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

##### Green behaviours 5-9

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

##### Green behaviours 9-13

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peers

##### What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

##### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

##### Amber behaviours 5-9

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

##### Amber behaviours 9-13

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

##### What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

##### What can you do?

Red behaviours indicate a need for immediate intervention and action.

##### Red behaviours 5-9

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

##### Red behaviours 9-13

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

## Behaviours: age 13 to 17

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

### What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

#### Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active

### What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

#### Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress,
- withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- taking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult- only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone

### What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

### What can you do?

Red behaviours indicate a need for immediate intervention and action.

#### Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there
- is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals
- receipt of gifts or money in exchange for sex

## Appendix 6:

### Risk Assessment for Child-on-Child Abuse/Harmful Sexual Behaviour

# Collingwood College

## Risk assessment for Child-on-Child abuse/ Harmful Sexual Behaviour

This risk assessment is intended to be used by the College whereby an incident(s) of Child on Child abuse has occurred or is likely to occur and is deemed appropriate. The risk assessment will show considerations made for both/all students involved and will highlight the plan in place to keep all students safe. This will also take into consideration the rights, wishes and feelings of all children involved. Each section/question will be considered from the perspective of all students involved. Considerations will also be given for the impact on, and needs of, the wider College community. All concerns and proposed actions will be recorded. The College will work with the local multi-agency safeguarding hub (MASH/C-SPA), the Education Safeguarding Lead and other agencies as necessary when completing this risk assessment. This document should be reviewed frequently to ensure it is fit for purpose. The terms victim and child alleged to have caused harm are used to identify the children involved. NB: there should be no assumption of guilt on the part of the child alleged to have caused harm, pending investigation.

## Human Rights Act & The Equalities Act 2010

When completing this risk assessment, safeguarding staff must have absolute consideration for the HRA and Equalities Act. The victim and child alleged to have caused harm (including parents) must be made aware of these rights. These rights include:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right);
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity;
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination;
- Protocol 1, Article 2: protects the right to an effective education. Being subjected to sexual violence or sexual harassment may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

### Equality Duty

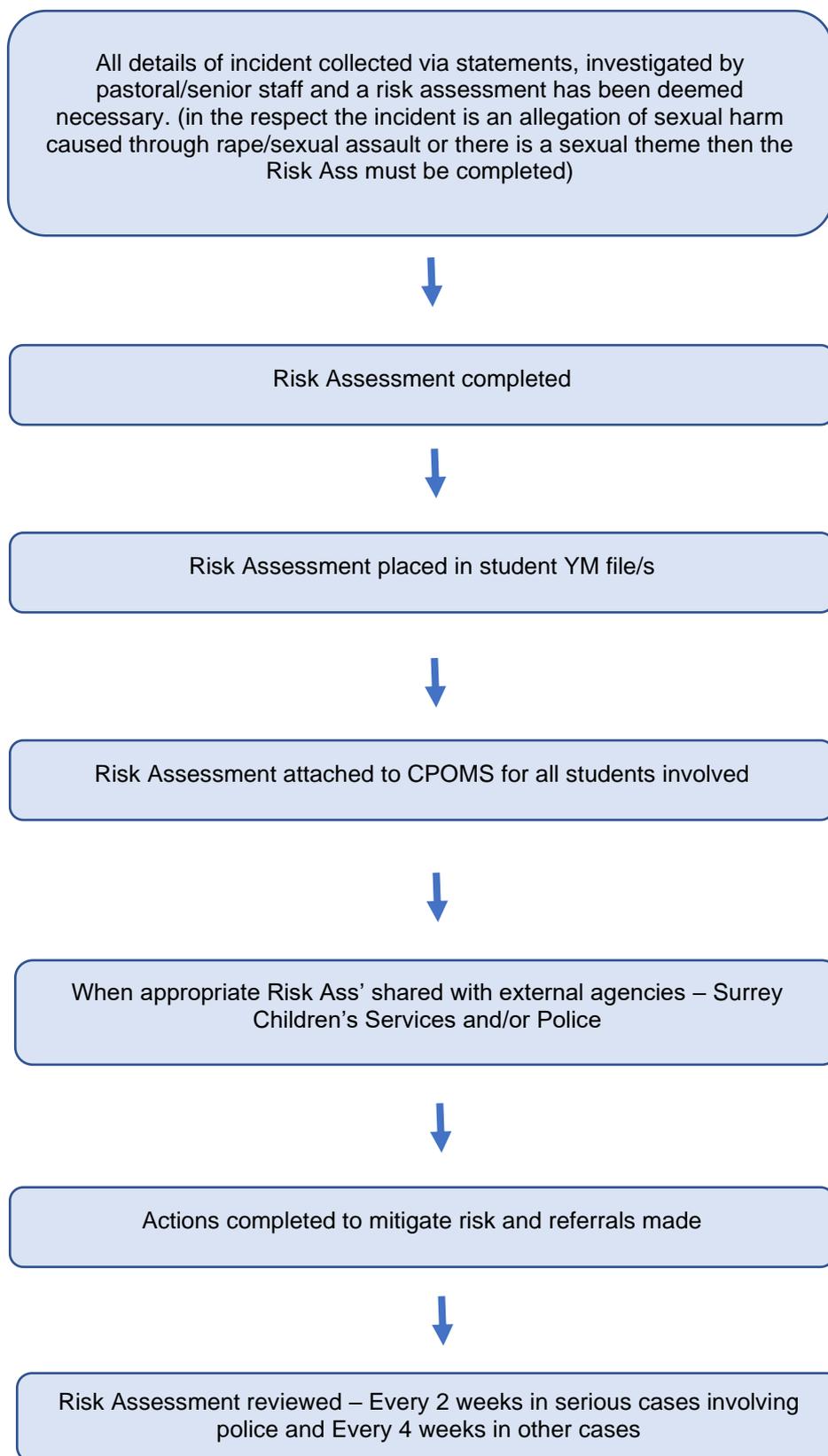
Education settings are required to comply with relevant requirements as set out in the Equality Act 2010 (the Equality Act).

- According to the Equality Act, education settings must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy or sexual orientation (protected characteristics).
- Whilst all of the above protections are important, in the context of this guidance education settings should carefully consider how they are supporting their pupils with regard to their sex and sexuality
- Provisions within the Equality Act allow education settings to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting one group. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

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 KCSIE 2023.

This risk assessment should follow the detailed procedures below.



## RISK ASSESSMENT FORM

Basic Information		Details		
Name and role				
Contact details (email address and ext. phone number)				
Name of school/college(s) for victim(s) if not Collingwood College				
Name of school/college(s) for child/ren alleged to have caused harm if not Collingwood College				
Did the incident occur on College premises? If not, where did the incident occur?				
Considerations	Risk (consider victim, child alleged to have caused harm, other students and staff)	Risk level (high, medium or low)	Actions to reduce risk	Revised risk level (high, medium or low)
What is the incident?				
Who was involved?				
Where did it happen?				
Does this incident constitute a crime? Assault, sexual assault, rape, sharing of indecent images of children etc. etc. As such, has this been referred to the Police?				
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 perceived threat from the child alleged to have caused harm to the victim and/or others?				

Considerations	Risk (consider victim, child alleged to have caused harm, 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 child alleged to have caused harm 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 peer/friendship groups?				
Do they share transport to/from College?				
Are they likely to come into contact with each other (or anyone else involved in/with knowledge of the incident) outside of College?				
How can such contact be limited?				
Is there a risk of harm from social media and gossip?				

**Further action taken by the College: Please complete for each child involved:**

**Student Name:**

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

**Student Name:**

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

**Student Name:**

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

**Student Name:**

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

## Appendix 7:

### Annex F: Table of substantive changes from previous version (September 2022)

This table explains where we made substantive changes.

Summary	About the guidance
Part one	Safeguarding information for all staff
Paragraph 13	Updated link to Behaviour in schools' guidance.
Paragraph 14	New text added to raise awareness of the existing expectation for relevant staff to understand filtering and monitoring.
Part two	The management of safeguarding
Para 103	Added reference to filtering and monitoring.
Paragraph 124	<b>New text added to make clear staff training should include understanding roles and responsibilities in relation to filtering and monitoring.</b>
Paragraph 138	<b>Reference to child protection policies and appropriate filtering and monitoring on school devices and school networks.</b>
Paragraph 142	Added new section referencing the new published filtering and monitoring standards. The standards are to support schools meet their duty to have appropriate/effective filtering and monitoring systems in place, this is not a new burden.
Paragraph 144	Reference to cyber security standards.
Paragraphs 167	Updated to reference Keeping children safe in out-of-school settings.
Paragraph 175	Clarification provided on the difference between children missing education and children absent from education.
Paragraph 202	Additional signpost to specialist organisations for children with special educational needs and disabilities.
Part three	Safer recruitment
Footnote 221	Clarification that it is good practice for schools to inform shortlisted candidates that online searches will be carried out.

Paragraph 276-277	Paragraph re-ordered to flow better.
Part four	<b>Allegations/concerns</b>
New heading and paragraph	Organisations or individuals using school premises.
Part five	Child-on-child sexual violence and sexual harassment
Throughout the guidance	<b>Revised to reflect wording in behaviour guidance.</b>
Annex A	Safeguarding information for school and college staff
	<b>Revised to reflect changes in Part one</b>
<b>Annex B</b>	<b>Further information</b>
Children absent from education	Revised to reflect the difference between children absent from education and children missing education.
Forced Marriage	Reflects change in law from February 2023
Child Exploitation	New reference to multi-agency practice principles