M|P|W

Mander Portman Woodward

Safeguarding and Child Protection Policy

2021-2022

Approved by:

Adam Cross (Designated Safeguarding Lead) **Date: 13/09/21**

Mark Shingleton (Principal)

MPW Board **Date: 21/09/21**

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1 Safeguarding Contact Details

School

Position	Name	Phone	e-mail
Designated safeguarding lead (DSL)	Adam Cross	0121 4549637	Adam.cross@mpw.ac.uk
Deputy DSL	James Bourne	0121 4549637	James.bourne@mpw.ac.uk
Deputy DSL	Mark Shingleton	0121 4549637	Mark.shingleton@mpw.ac.uk
Deputy DSL	Ryan Moran	0121 4549637	Ryan.moran@mpw.ac.uk
Principal	Mark Shingleton	0121 4549637	Mark.shingleton@mpw.ac.uk
CEO	Spencer Coles	020 7835 1355	Spencer.cole@mpw.ac.uk
Chair of Governors and Nominated Safeguarding Governor	Steve Boyes	020 7835 1355	governorsdb@mpw.ac.uk

Local Authority children's social services numbers

Name	Phone	Out of hours phone	e-mail
Children's Advice and Support Service (CASS)	0121 303 1888	0121 675 4806	cass@birminghamchildrenstrust.co.uk
The LADO Team	0121 675 1669	0121 675 4806	Ladoteam@birminghamchildrenstrust.co.uk

Allegations against staff

Title	Name	Phone	e-mail
Local authority's designatedofficer (LADO) Team	N/A	0121 675 1669	Ladoteam@birminghamchildrenstrust.co.uk

Extremism

Title	Name	Phone	e-mail
LSCP Lead for extremism		0121 303 1888	cass@birminghamchildrenstrust.co.uk
Anti-Terrorist Hotline		0800 789 321	
DfE non-emergency advice	Telephone helpline andmailbox		counter-extremism@education.gsi.gov.uk

Female genital mutilation (FGM)

Title	Name	Phone	e-mail
LSCP Lead for FGM		0121 3031888	cass@birminghamchildrenstrust.co.uk
Police	Non- emergency number	101	

Other useful contact details

Name	Phone
Childline	0800 1111
NSPCC	0808 800 5000
NSPCC helpline for victims of sexual abuse in schools	0800 136 663
NSPCC whistleblowing advice line	0800 028 0285

Kidscape (Anti-bullying helpline for parents)	0845 120 5204
Child exploitation Online Prevent (CEOP)	0870 000 3344
Samaritans	116 123
The Disclosure and Barring Service PO Box 3961, Royal Wootton Bassett, SN4 4HF	0300 200 190
Kidscape (Anti-bullying helpline for parents)	0845 120 5204
Report Abuse in Education	0800 136 663
National Domestic Abuse Helpline	0800 2000 247
Child exploitation Online Prevent (CEOP)	0870 000 3344

2 Introduction

2.1 Mander Portman Woodward (MPW) is committed to safeguarding and promoting the welfare and wellbeing of young people and staff. We believe that everyone, without exception, has a right to be safe and to be treated with dignity and respect regardless of background and live a life free from discrimination. The college recognises that children and young people learn best when they are healthy, safe and secure.

2.2 Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. (Keeping Children Safe in Education, September 2021.)

2.3 This policy applies to all students in the college.

2.4 The purpose of this policy is to inform all staff (including supply staff), parents (including guardians and carers), contractors, volunteers and governors about the college's responsibilities for safeguarding children and to enable all parties to have a clear understanding of how these responsibilities should be carried out. It applies wherever staff members are working with students – even where this is away from the college, such as on educational visits or when delivering lessons online.

2.5 This policy is published on the college's website and is also available to parents of current and prospective students from the Designated Safeguarding Lead (Adam Cross) or the Administration Team on request. Large print or other accessible formats can also be made available.

2.6 The policy is drafted in accordance with the Local Safeguarding Partnership's agreed local interagency procedures.
[Note: Multi-agency arrangements for safeguarding children are now handled by the three safeguarding partner agencies: the local authority (Birmingham); the clinical commissioning group; and the police. These safeguarding partners come together to form the Local Safeguarding Children's Partnership (LSCP), replacing what used to be referred to as the Local Safeguarding Children's Board (LSCB)]

2.7 This policy is also in accordance with current legislation and the following statutory guidance:

- Keeping Children Safe in Education September 2021 (KCSIE)
- Working Together to Safeguard Children July 2018 (WTSC)
- Prevent Duty Guidance for England and Wales July 2015 (updated April 2021)
- Education (Independent School Standards) Regulations 2014
- What to do if you are worried a child is being abused – advice for practitioners March 2015
- Safeguarding children and young people October 2018
- Children Missing Education September 2016

- Relationships Education, Relationships and Sex Education and Health Education (2019)

2.8 We are advised by the Local Safeguarding Children's Partnership, whom the DSL regularly consults on safeguarding matters. Contact details can be found in section 1 of this policy.

2.9 Every complaint or suspicion of abuse from within or outside the college will be taken seriously and action will be taken in accordance with this policy.

Mark Shingleton

Principal

Steve Boyes

Chair of Governors

3 Principles

3.1 MPW expects all staff, governors and volunteers to share our commitment to safeguarding and promoting the welfare of all students in our care. To achieve this, the college seeks to create a safe college environment with a strong pastoral system, where students who have been subject to any form of abuse can report the matter confident that it will be taken seriously, they will not be made to feel ashamed of making a report and will be fully supported. Staff are trained to listen to students' concerns, identify issues early and respond appropriately following agreed procedures. The college will consider, at all times, what is in the best interest of the child.

3.2 The college will take all reasonable measures to:

- ensure that we practise safer recruitment in checking the suitability of staff, governors and volunteers (including staff employed by other organisations) to work with children and young people. Staff recruitment procedures are outlined in detail in the college's **Recruitment, Selection and Disclosure Policy**;
- ensure that, where staff from other organisations are working with our students on another site, we have received confirmation that appropriate child protection checks and procedures apply to those members of staff and that any such checks do not raise any issues of concern in relation to the suitability of those staff members working with children;
- follow the local inter-agency procedures of the Local Safeguarding Children's Partnership and contribute to inter-agency working;
- support students in need through early intervention and, where appropriate, support them in co-operation with multi-agencies who are working to the Common Assessment Framework (CAF) and as part of the Team around the Child (TAC) approach;
- be alert to signs of abuse, both in the college and from outside and to protect each student from any form of abuse, whether from an adult or another student;
- deal appropriately with every suspicion or complaint of abuse and support students who have been abused in accordance with their agreed child protection plan;
- design and operate procedures which promote this policy, but which, so far as possible, ensure that tutors and other staff who are innocent are not prejudiced by false allegations;
- be alert to the needs of students with physical and mental health conditions;

- operate robust and sensible health and safety procedures;
- operate clear and supportive policies on drugs, alcohol and substance misuse;
- assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
- identify children who may be vulnerable to radicalisation, and know what to do when they are identified;
- take all practicable steps to ensure that the college premises are as secure as circumstances permit;
- teach students about safeguarding issues and about how to keep themselves safe (including online and when working from home online); and
- ensure that any deficiencies in our child protection and safeguarding procedures are remedied without delay.

4 Roles and responsibilities

4.1 Safeguarding and child protection is **everyone's** responsibility. All staff (including governors, supply staff, contractors and volunteers) are under a general legal duty to:

- contribute to providing a safe environment in which students can learn;
- consider at all times the best interests of the student and take action to enable all students to have the best outcomes;
- attend appropriate safeguarding and child protection training on an annual basis or additionally as directed by the DSL;
- be aware of the indicators of the different forms of abuse and neglect and of emergent mental health issues;
- assist children in need and to protect children from abuse, neglect, radicalisation and extremism;
- be familiar with the college's policies pertaining to safeguarding and child protection procedures and follow them;
- know how to access and implement the procedures, independently if necessary;
- keep a sufficient record of any significant complaint, conversation or event;
- report any matters of concern to the DSL or, where appropriate, to one of the key contacts in accordance with this policy; and
- support social services and any other agencies following any referral.

4.2 The Designated Safeguarding Lead (DSL)

The college has appointed a Designated Safeguarding Lead (DSL) who is a senior member of staff and member of the college's leadership team. The DSL takes lead responsibility for safeguarding (including on-line safety) and child protection and is the first point of contact for parents, students, staff and others if they have any concerns about safeguarding or child protection. The college also has Deputy DSLs, ensuring that there is always an appropriately trained and designated person in the college at all times. There is an addendum to this policy which outlines the measures the college has put in place to ensure there is effective DSL cover in the event of staff absence or lockdowns due to the ongoing COVID-19 pandemic.

The DSL will be given the time, funding, training, resources and support to ensure they are able to fulfil all the key aspects of their role as described in KCSIE (Sept 2021):

- **Managing Referrals:** the DSL will manage the referral of cases of suspected abuse, neglect, radicalisation or any other relevant issue to the Local Authority Social Care Service, Channel programme, DBS and/or Police as appropriate.
- **Working with others:** the DSL will be the principal point of contact for all staff and when co-ordinating different departments and functions within and outside the college in the management of a case. They will promote supportive relationships with parents and carers to safeguard students' welfare, be able to identify the causes and consequences of issues that children are experiencing and to support staff to make appropriate adjustments in the provision of educational programmes.
- **Information sharing and managing the child protection file:** the DSL is responsible for keeping child-protection files up to date with accurate and complete records of any actions or decisions taken and ensuring these confidential records are securely stored and, where appropriate, transferred to a new school promptly.
- **Raising Awareness:** the DSL is responsible for reviewing and updating the college's safeguarding policy at least annually, for ensuring that all staff members have had appropriate training regarding its implementation, and for ensuring that parents can access the policy and know that the college may make referrals where abuse or neglect is suspected.
- **Training, knowledge and skills:** the DSL will receive the appropriate level of training, together with regular updates, to ensure they are able are able to understand the unique risks associated with online safety, to be confident that they have the relevant knowledge and up-to-date capability required to keep children safe whilst they are online at school or college and to diagnose and respond to the specific needs of vulnerable children and work effectively with agencies such as the LADO, the Police and the Channel agency.
- **Providing support to staff:** the DSL should receive sufficient support and training so that they can support staff and help them feel confident on welfare, safeguarding and child-protection matters, including referrals and taking into account safeguarding, welfare and SEN in the provision of academic and pastoral support.
- **Understanding the views of children:** the DSL should, through training, develop the knowledge and skills needed to encourage a culture of listening to children and taking account of their wishes and feelings among all staff. They should promote an understanding of the difficulties that children may have in approaching staff about their circumstances and help staff consider how to build trusted relationships which facilitate communication.

Note: A full description of the responsibilities of the DSL is set out in Appendix 5 of this policy.

4.3 Deputy Designated Safeguarding Leads (DDSL)

DDSLs are trained to the same standard as the DSL and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of students. In the event of a long-term absence of the DSL, a Deputy will assume responsibility for all the activities described above. On a day-to-day basis safeguarding activities may be delegated to a DDSL but final lead responsibility for safeguarding and child protection remains with the DSL.

4.4 Principal

The Principal is responsible for ensuring that the procedures outlined in this policy are followed on a day-to-day basis. To this end the Principal will ensure that:

- the safeguarding and child protection policy and procedures adopted by the governing body are implemented and followed by all staff;

- sufficient time, training, funding, support and resources necessary to enable the DSL and DDSLs to carry out their roles effectively are allocated, including the assessment of students and attendance at strategy discussions and other necessary meetings;
- matters which affect student welfare are adequately risk-assessed by appropriately-trained individuals and for ensuring that the relevant findings are implemented, monitored and evaluated;
- systems which operate with the best interests of the student at heart are in place for students 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 college's Whistleblowing Policy and low-level concerns procedures;
- students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online;
- safer recruitment procedures are being adhered to in line with Part 3 of KCSIE, September 2021;
- he acts as the 'case manager' in the event of an allegation of abuse made against another member of staff (including supply staff and volunteers) and liaises with the Local Authority Designated Officer (LADO); and
- he notifies the Disclosure and Barring Service and, where appropriate, the Teaching Regulatory Authority and/or the Police of anyone who has harmed or may pose a risk to a child.

4.5 Governing Body

The Governing Body has overall responsibility to ensure compliance with child protection statutory requirements and actively promote the wellbeing of students. It is the role of the Governing Body to provide scrutiny of the safeguarding policy and safeguarding practice. The Governing Body takes seriously its responsibility to fulfil its duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. To this end, the Governors will ensure that:

- an effective, up-to-date child protection policy is in place and made available on the college's website;
- other policies, as prescribed Part 2 of KCSIE, are in place and operational;
- required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Register;
- an appropriate member of staff from the college's leadership team is appointed to the role of DSL
- all staff receive safeguarding induction and ongoing training in accordance with this policy;
- students are taught about safeguarding, including online safety;
- the college's safeguarding arrangements take into account the procedures and practice of the Local Safeguarding Children Partnership;
- the college contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of students are identified;
- clear systems and processes are in place for identifying and managing students with mental health problems;
- child protection files are maintained and, where appropriate, such records are transferred to a student's new school or college in accordance with statutory guidance;
- appropriate filters and monitoring systems are in place to keep children safe online;
- the college reports to their local authority any student who joins or leaves the college at non-standard transition times in line with statutory and local authority guidance; and

- written assurances are provided by individuals or organisations who hire college premises confirming appropriate safeguarding and child protection procedures are in place.

4.6 Safeguarding Governor

The Chair of Governors is Steve Boyes and he is also the Nominated Safeguarding Governor who takes lead responsibility for monitoring the operation of safeguarding arrangements in the college. This is done in a number of ways, these being:

- discussions about safeguarding matters with the DSL at least once a term and more regularly, if needed;
- liaising with the local authority and/or partner agencies where appropriate; and
- conducting an annual audit of the college's safeguarding procedures and submitting a written report to the Governing Body with recommendations for further improvements. The annual written report will typically consider: the effectiveness and implementation of relevant policies; staff safeguarding training; staff recruitment procedures; the handling of safeguarding issues; referral management; the contribution the college is making to inter-agency working; and the provision for teaching students how to keep themselves safe. This audit will form part of the annual review undertaken by the Governing Body as a whole to ensure that all policies, procedures and training provided by the college are effective and comply with the law.

4.7 The contact details for the Safeguarding Governor are set out in Section 1 of this policy.

5 Key personnel

The DSL at the college is Adam Cross, Vice Principal and member of the Senior Leadership Team. If the DSL is unavailable, the role will be carried out by one of the Deputy DSLs: Libby Turton (Director of Learning Support), James Bourne (Vice Principal/Head of GCSE), Ryan Moran (Vice Principal/International Officer) or Mark Shingleton (Principal). The DSL or Deputy DSLs are always available when the college is open to discuss safeguarding concerns with staff, either in person or via telephone, email or MS Teams.

5.1 If the DSL and Deputy DSLs are unavailable, the role will be carried out by the Principal. Outside college hours and during out-of-term activities, a designated member of the SLT will assume temporary responsibility.

5.2 Adam Cross is the designated member of staff who oversees the welfare of looked-after children.

5.3 Contact details for all the above are contained in section 1 of this policy.

6 Staff training

6.1 Staff training encourages all members of staff to maintain an attitude of 'it could happen here' where abuse and neglect are concerned.

6.2 Induction training for all new members of staff, including temporary employees or volunteers, includes formal child-protection training which covers:

- This safeguarding policy and related policies on Anti-Bullying and Cyber-bullying, E-Safety, Mental Health and Prevent*;
- Part 1 and Annex B of KCSIE*;
- the role, identity and contact details of the DSL and Deputy DSLs;
- policies on acceptable use of IT and online safety (including when they are online at home)*;
- the student behaviour policy*;
- the college's safeguarding response to students who go missing from education;
- the Staff Code of Conduct*;

- the college's policy on Whistleblowing*; and
- an overview of the Local Safeguarding Children Partnership's procedures.

** Copies of these documents will be provided either in paper form or electronically as part of the induction process and new staff will be required to sign a declaration confirming they have read and understood them. A proportional, risk-based approach will be taken to determine the level of information provided to temporary staff and volunteers.*

6.3 All staff, including the Principal and volunteers involved in regulated activity, will undertake appropriate child-protection training which, in line with LSCP guidance, is updated every two years. In addition, all staff will receive safeguarding updates delivered through a combination of INSET, e-bulletin updates, and the completion of relevant e-courses on a regular basis and at least annually. Safeguarding training is coordinated by the DSL and includes online safety and Prevent training, where appropriate.

6.4 All staff receive updated copies of the college policies referred to above and are required to confirm that they have read and understood them. In addition, Part 1 and, where appropriate, Annex B of KCSIE are reissued to staff whenever this statutory guidance is updated by the DfE. Staff training provides an opportunity to check and consolidate their understanding of the policies. Staff can also access the policies and further reading in the staff section of the college's VLE.

6.5 The DSL team will regularly assess the appropriate level and focus for staff training so that it can respond to specific safeguarding concerns such as mental health, peer on peer abuse, online safety, radicalisation, child sexual exploitation, child criminal exploitation, sexual violence and harassment, and female genital mutilation.

6.6 The DSL and Deputy DSLs undertake training that is in accordance with locally agreed procedures to provide them with the knowledge and skills necessary to carry out their role. This training includes Prevent awareness training and will be updated every two years. Additional specialist training will be obtained for those who have specific responsibility for looked-after children. They also refresh their knowledge and skills at regular intervals (and at least annually) by following developments in safeguarding to:

- keep abreast of best practice for promoting a culture of listening to children;
- remain up to date on the mechanics of inter-agency working as operated by the LSCP;
- understand the assessment process for providing early help and intervention, for example through locally agreed common assessment processes such as early-help assessments;
- have an up-to-date working knowledge of how local authorities conduct child-protection case conferences so they can contribute to these effectively when required to do so;
- be alert to the specific needs of children in need, those with Special Educational Needs and young carers;
- understand and support the college regarding the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation; and
- be able to keep proper written records of concerns and referrals.

6.7 All members of the Board of Governors receive training at least on a three-yearly basis, to ensure they have the knowledge necessary to exercise appropriate oversight over the college's safeguarding policies and procedures.

7 Hierarchy of intervention

7.1 The Local Safeguarding Partnership publishes threshold guidance (https://www.lscpbirmingham.org.uk/delivering-effective-support) that all agencies, professionals and volunteers in the area can use to consider how best to meet the needs of individual children and young people. This guidance provides a summary of thresholds for intervention in relation to a continuum of need, ranging from children who need no additional intervention to those who require intensive help and specialist support.

Children's needs are not static and they may experience different needs – at different points on the continuum – throughout their childhood years.

7.2 Within the continuum, there are four levels of intervention:

Level 1: Universal

These are children all of whose health and developmental needs will be met by universal services such as housing, mainstream education, primary health care, community resources alone. Children and young people at this level are achieving expected outcomes. There are no identified unmet needs, or the need is at a low-level and can be met by the universal services or with some limited additional advice or guidance. Children, young people, parents and carers can access these services directly.

Level 2: Universal Plus

These are children whose needs are not clear, not known or not being met. They may be vulnerable and showing early signs of abuse and/or neglect. Children and young people at this level are in need of coordinated early help and support from services to prevent problems from escalating and difficult to resolve.

Level 3: Additional Needs

Children and families at this level will be facing complex problems which will require an integrated and coordinated response from a number of agencies eg children's social services, CAMHS, health services etc. Children at this level, often described as children 'in need', are unlikely to achieve or maintain a satisfactory level of health or development, or their health and development will be significantly further impaired, without the provision of external services.

Level 4: Complex/Significant Needs

These are children who are suffering or are likely to suffer significant harm. This is the threshold for child protection. These children are likely to have already experienced adverse effects and to be suffering from poor outcomes.

8 Early help

8.1 MPW recognises the importance of providing early help to students to provide support for a problem as soon as it arises, to prevent it from escalating. We recognise that young people may face many challenges that put them in need of support and ensure that staff are aware of them. These include: stress, peer pressure, body image concerns, mental health and relationship issues.

8.2 Students are encouraged to raise concerns as soon as they are identified, either through their Personal Tutor or directly to the Designated Safeguarding Lead, so that effective early support can be provided.

8.3 If staff believe that a student could benefit from early help, they should discuss the matter with the DSL who will, taking into account the Local Safeguarding Partnership's threshold criteria, consider what action should be taken.

8.4 If early help is provided, the situation will be monitored carefully and a referral to children's social services made if the student's situation does not appear to be improving.

8.5 The college has various mechanisms to help identify emerging problems, including a thorough student recruitment process, the college's pastoral system, the PSHE programme and various policies, including Anti-Bullying and Cyber-bullying, E-Safety, Mental Health and Prevent. Staff training also prepares staff to identify students who might benefit from early help.

8.6 The college recognises the increased vulnerability of young people who:

- are Disabled or have Special Educational Needs (whether or not they have a statutory Education, Health and Care plan) as they are more prone to peer-group isolation or bullying (including prejudice-based bullying);
- do not have English as a first language;
- are living away from home for the first time;
- are frequently missing from care or home
- are faced with challenging family circumstances;
- are showing signs of being drawn into anti-social or criminal behaviour
- are looked after children;
- are acting as a young carer;
- are misusing drugs or alcohol themselves;
- are at risk of being radicalised or exploited
- are showing early signs of abuse, neglect or mental health problems; and
- may be subject to discrimination and maltreatment on the grounds of race, religion, ethnicity, sexual orientation or sexual identity.

Such children may be more likely to need early help. Also, recognising abuse or neglect may be more difficult for these young people for many reasons, including:

- assumptions that indicators of possible abuse such as behaviour, mood or injury relate to a student's disability without further exploration;
- that students with Special Educational Needs or Disabilities (SEN/D) can be disproportionately impacted by bullying/peer-on-peer abuse without outwardly showing any signs;
- communication barriers and difficulties overcoming these barriers; and
- a disabled student's understanding of abuse.

9 What to look out for and when to be concerned

9.1 All staff should be aware of the types and signs of abuse and neglect so that they are able to identify students who may be in need of help or protection. If staff are unsure, they should always speak to the DSL.

9.2 **Child abuse** is 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. 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 (peer-on-peer abuse). Serious bullying is a form of abuse and therefore will be treated as a child protection concern if there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm.

9.3 Staff should be aware of the four main categories of child abuse which are commonly identified:

- **Physical abuse**: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), 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 through a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. 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. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer-on-peer abuse) and is covered in greater detail later in this policy (section 20).
- **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 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 or 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.

9.4 Other forms of abuse which staff should be aware of are:

- Children missing from education
- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE)
- County lines
- Domestic abuse
- Honour-Based Abuse (HBA) and Female Genital Mutilation (FGM)
- Forced marriage
- Radicalisation
- Peer-on-peer
- Sexual violence and harassment (including upskirting)

Further information is provided in Appendices 2 and 3 of this policy and in Part 1 and Annex B of KCSIE.

10 Contextual safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between young people outside this environment. This is known as contextual safeguarding. All staff should consider, and especially those within the safeguarding team, whether students are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of forms

and young people may be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, and serious youth violence.

11 Signs of abuse

11.1 All staff need to be aware that students may be reticent about reporting abuse generally, and particularly so about peer-on-peer abuse, and need therefore need to be vigilant for potential indicators that abuse may be taking place and using MyConcern inform the DSL team of any concerns they might have.

11.2 Possible signs of abuse include (but are not limited to) the following (and these do not necessarily mean that abuse is occurring):

- the student discloses that he or she has been abused, or asks a question which gives rise to that inference
- the student has an injury that cannot be reasonably or consistently explained, or is unusual in type or location
- the student shows signs of injury on a regular or patterned basis
- the student engages in extreme or challenging behaviour or there is a sudden change in the student's behaviour
- the student asks to drop subjects with a particular tutor and seems reluctant to discuss reasons
- the student appears neglected (eg dirty, hungry, inadequately clothed)
- the student appears reluctant to return home or has been openly rejected by parents or guardians
- the student's development is delayed in terms of emotional progress
- the student withdraws emotionally – showing a lack of trust in adults
- the student shies away from being touched or flinches at sudden movements
- the student loses or gains weight

11.3 Further guidance is provided in Appendix 2. Other sources of information on the signs of abuse include: the DfE advice note What to do if you're worried a child is being abused (2015) and the NSPCC website.

12 Listening to students and record keeping

12.1 The college provides a range of opportunities for students to be listened to. Students can speak with Personal Tutors, subject tutors, a member of the DSL team or make use of the college's counselling service. These opportunities are signposted by Personal Tutors and in PSHE sessions. Links to external agencies such as Childline and Kooth are included in weekly PSHE newsletters and on the college's virtual learning environment.

12.2 If a student discloses that he or she has been abused or neglected in some way, the member of staff should:

- immediately stop any other activity to listen;
- listen carefully to the student and keep an open mind - do not interrupt or be afraid of silences;
- limit the questioning to the minimum necessary for clarification using "what, when, how, where" but avoiding leading questions (such as, "has this happened to your siblings?") that may prejudice an investigation;
- not make any attempt to investigate the incident themselves or make a decision as to whether or not the student has been abused;
- reassure the student, but never promise not to tell anyone. Instead, explain who has to be told to ensure that proper action is taken in accordance with this policy;

- discuss the conversation with the DSL as soon as possible, and take no further action unless instructed to do so by the DSL or the Principal;
- only share information on a need-to-know basis; and
- make a full written record of the conversation as set out below.

12.3 Staff must record in writing all concerns, discussions and decisions made about a student as soon as possible on MyConcern. The recording must be a clear, precise and factual account of the conversation or observations. Where a child has made a disclosure, the record must include details of:

- its date, time and place
- what was said and done, by whom and in whose presence
- any noticeable non-verbal behaviour or words used by the child.

The record should be signed by the person making it, using names, not initials. Any other evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers) must be kept securely and passed on to the DSL as soon as possible. No copies should be retained by the member of staff or volunteer. The DSL or DDSL will organise for the evidence to be scanned and added to the MyConcern incident record.

Where a report includes an online element, staff should, where possible, avoid viewing illegal images of a child and under no circumstances should such images be forwarded electronically. Further guidance is available on what to do if viewing an image is unavoidable on:

- https://www.gov.uk/government/publications/searching-screening-and-confiscation
- *Sharing nudes and semi nudes: advice for education settings working with children and young people (December 2020)*.
- UKCIS advice on sharing nudes and semi-nudes

13 Procedure to be followed by staff if they have concerns about a student's welfare

13.1 If a member of staff has concerns about a student's welfare, including any mental health concerns, **they must inform the DSL as soon as possible**, unless the concerns involve an allegation against a member of staff, in which case the procedures set out in the section *Allegations against members of staff (including supply staff) and volunteers* below should be followed. Staff should not assume that somebody else will act and share information that might be critical in keeping a student safe.

13.2 All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSL.

13.3 If a tutor discovers that an act of female genital mutilation (FGM) appears to have been carried out on a girl under 18, the tutor **must** report this to the police. Unless the tutor has a good reason not to, they should also still inform the DSL. This statutory duty does not apply to suspected cases of FGM or those at risk of FGM, which should both be addressed in accordance with the safeguarding procedures described in this policy. (For further details, see Annex A of KCSIE and 'Guidance for Schools' information.)

13.4 The normal safeguarding procedures outlined in this Policy must be used when there are concerns about children who may be at risk of being drawn into terrorism.

13.5 Parents can report to the DSL on the welfare of any student in the college, whether their own child or not. If preferred, parents may discuss concerns in private with the student's Personal Tutor or other member of staff, who will notify the DSL.

13.6 Any member of staff may refer a matter to children's social services directly. This could happen in exceptional circumstances such as in an emergency or if there is a genuine concern that appropriate action has not been taken.

14 Duties of the DSL on being notified of a concern about a student's welfare

14.1 When the DSL is notified of any concerns about a student's welfare, he or she will decide on the appropriate course of action. In particular, the DSL will decide whether a referral should be made to children's social services.

14.2 Factors that the DSL should bear in mind when making their decision include:

- the best interests of the child
- the nature and seriousness of the complaint
- contextual factors
- the referral threshold set by the relevant Local Authority
- the student's wishes or feelings
- the inter-agency procedures of the Local Safeguarding Children Partnership
- where relevant, local information sharing protocols relating to Channel referrals.

14.3 If the DSL decides not to make a referral, but to support the student with early help, the DSL will keep the situation under review and consider a later referral to children's social services if the student's situation does not appear to be improving.

14.4 Members of the DSL team are responsible for maintaining written safeguarding records once an issue has been logged on MyConcern. These records are confidential and the only personnel within the college who have access to them are the DSL/DDSLs. Such records will include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved; and
- a note of any actions taken, decisions reached and the outcome.

15 Making a referral to children's social services

15.1 When a student is not considered at risk of harm, but still has an unmet need that could mean they are in a Child in Need, a referral should be made as soon as possible by the DSL to Children's Social Care in the local authority in which the student lives. Parental consent for referrals of this type is not required in these circumstances. However, it is best practice for such concerns to be discussed first with parents and any subsequent referral to be made transparently with their knowledge. Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) there should an inter-agency early-help assessment and procedures will be put in place by children's services to arrange this. The college will coordinate with the local agencies involved.

15.2 If a student is in **immediate danger** or is at **risk of harm**, a referral should be made to children's social services and/or the police **immediately**. Further guidance on when to call the police is provided by the NPCC - when to call the police. The college is not required to obtain parental consent prior to a referral being made.

15.3 If the initial referral is made by telephone, the DSL should confirm the referral in writing. Confirmation of the referral and details of the decision on what action will be taken should be received from the Local Authority within one working day. If this is not received, the DSL should contact children's social services again.

15.4 If the DSL is not sure whether a referral should be made, he/she will consult with children's social services on a no-names basis. However, if at any stage sufficient concern exists that a student may be at risk of harm or in immediate danger, a referral to children's social services and/or the police will be made immediately.

15.5 Anyone can make a referral, although if a referral is made by someone other than the DSL, the DSL should be informed as soon as possible.

15.6 If, after a referral, the student's situation does not appear to be improving, the DSL should contact children's social services again to follow the matter up, to ensure both that their concerns are addressed and that the student's situation improves.

15.7 Where relevant, the college will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The college will respond to requests for information from the police promptly, and in any event within five to ten working days (see the college's Prevent Policy).

15.8 If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the college will consider whether any disciplinary action is appropriate against the individual who made it.

Note: Refer to Appendix 3 for a flowchart outlining the referral process to children's social services.

16 Informing parents

16.1 Parents will usually be informed of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult with the Local Authority Designated Officer (LADO), children's social services, the police and/or the Principal before discussing details with parents.

16.2 For Channel referrals, the DSL will consider seeking the consent of the student (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

16.3 When the college decides to refer a particular complaint of abuse to social services or the police, the parents/guardian and student will be informed in writing of their right to make their own complaint or referral to social services or the police, where appropriate, and will be provided with contact names, addresses and telephone numbers.

16.4 For the avoidance of doubt, referrals do not require parental consent. Staff must act in in the best interests of the child, even if this means making a referral against the parents' wishes.

17 Allegations about members of staff, supply staff, contractors and volunteers

17.1 Guidance to staff

Guidance is given to staff to be circumspect about placing themselves in situations which may

- put themselves or their students at risk of harm; or
- give rise to allegations of abuse.

To reduce the risk of allegations, staff should be aware of safer working practices and should be familiar with the detailed guidance on acceptable behaviour and actions contained in the Staff Code of Conduct, which is issued to all staff. Particular care should be taken where staff have one-to-one meetings with a student.

17.2 The following procedures will be used where it is alleged that a member of staff, a supply teacher, contractor or volunteer has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; or
- behaved or may have behaved in a way (in or outside of college) that indicates they might not be suitable to work with children. The incident may not necessarily involve children but may raise concerns that such behaviour might be replicated against a child (eg domestic violence at home).

These criteria are often referred to as the allegation or harms threshold. The procedures outlined below aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. The procedures follow Part 4 of KCSIE (September 2021).

17.3 Reporting an allegation about staff

If an allegation is made about staff that appears to meet the criteria in paragraph 17.2:

- Where an allegation is made about a member of staff, supply staff, the DSL, contractor or volunteer, the matter should be reported immediately to the Principal, or in the Principal's absence, to the Safeguarding Governor/Chair of Governors, Steve Boyes. The adult to whom the allegation relates should not be informed without the explicit consent of the Local Authority Designated Officer (LADO), the person designated by the local authority to be involved in the management of allegations against people who work with children.
- Allegations about the Principal should be reported to the Chairof Governors, Steve Boyes, (steve.boyes@mpw.ac.uk) or, in his absence, the CEO, Spencer Coles (spencer.coles@mpw.ac.uk), without first notifying the Principal.
- Allegations about a governor should be reported to the Chair of Governors. If the allegation is against the Chair of Governors, the matter should be reported to the CEO.
- The Principal, Chair of Governors or CEO who receives any such allegation is referred to in these procedures as the 'case manager'.

17.4 Action to be taken by the case manager

- Before contacting the LADO, the case manager will conduct basic enquiries in line with the Local Safeguarding Partnership's procedures to establish the facts to help determine whether there is any foundation to the allegation. Nothing must be done at this initial stage that could jeopardise a future police investigation.
- If the case manager is unsure whether the allegation meets the criteria in para 17.2 above, the LADO will be consulted for advice.
- Any allegations meeting the criteria in para 17.2 will be dealt with in accordance with the local authority's arrangements for managing allegations. All such allegations must be dealt with as a priority to avoid any delay.
- The case manager will immediately (and in any event within one working day) discuss the matter with the LADO – the person designated by the local authority to be involved in the management of allegations against people who work with children – before further action is taken. The case manager may also consult with the DSL, but no attempt will be made to formally investigate the allegation until the LADO is consulted. The purpose of the initial discussion between the case manager and the LADO is to consider the nature, content and context of the allegation and agree a course of action. All discussions with the LADO should be recorded in writing.

- The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it will be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom.
- In situations where a person is deemed an immediate risk to children or where there is evidence of a possible criminal offence, the case manager may, in consultation with the LADO, request police involvement from the outset.
- Where an adult makes an allegation to the college that they were abused as child, the individual will be advised to report the allegation to the police. Non-recent allegations made by a student will be reported to the LADO in line with the Local Safeguarding Partnership's procedures for dealing with such allegations. The LADO will then coordinate with the children's social care and the police.

17.5 Disclosure of information

- The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted and, if appropriate, children's social care and the police.
- The parents of the student involved will be informed of the allegation as soon as possible if they do not already know of it, although where external agencies are involved, the case manager will not inform the accused or the parents until it has been agreed what information can be disclosed. Parents will be kept informed of the progress of the case, only in relation to their child: no information can be shared regarding the member of staff.
- The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

17.6 Investigation

- Investigations will usually be undertaken by a senior member of college staff, under the guidance of the LADO. However, depending on the nature and complexity of an allegation, the investigation may instead be conducted by external agencies, such as social services or the police. In some cases, the LADO may ask for further enquiries to be made before a formal decision is reached about how to proceed. When this occurs, the LADO will provide specific guidance as how and by whom the investigation should be conducted.
- Where an external agency is conducting the investigation rather than the college, the college will cooperate fully with external investigators. No internal investigation into possible breaches of the college's disciplinary code will commence until any external investigation or criminal proceedings are complete.
- It is recognised that the college may have to consider an allegation against an individual not directly employed by the college: for example, supply tutors provided by an employment agency or business. MPW will ensure that the agency are made fully aware of any allegations and that they are dealt with properly. Prior to ceasing using a supply tutor due to safeguarding concerns, the facts will be found out and the LADO liaised with to determine a suitable outcome. MPW may take the lead in the investigation, to ensure that the allegation is dealt with properly and to recognise the fact that the agency would not have direct access to students or other college staff. They would therefore not be able to collect the facts or liaise with the LADO, police and/or children's social services. The agency will be made aware of the issues and be fully involved, even though the college is taking the lead. For example, the college will discuss with the agency whether it is appropriate to suspend the person they have supplied, or redeploy them, whilst the investigation is carried out. Supply staff will be advised to contact their trade union for representation. If there is an allegation meeting, it will address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are considered by the college.
- The college will not cease its investigations if the person involved leaves, resigns, ceases to provide their services, or refuses to cooperate. Records will be kept of the nature of the allegation and any supporting

evidence used to determine whether or not, on the basis of information available, the allegation is substantiated. The person involved will be notified in writing of the outcome of the investigation process.

- In accordance with DfE statutory guidance, the following definitions will be used when determining the outcome 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 cause harm to the person subject to the investigation.
    - False: there is sufficient evidence to disprove the allegation
    - Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
    - Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

17.7 Support

- The college has a duty of care towards its employees and will ensure that effective support is provided for anyone facing such an allegation. A representative will be appointed to keep him or her informed of the progress of the case.
- The college will also provide access to counselling or medical advice, where appropriate.
- The college will not prevent social contact with work colleagues and friends, when staff are suspended, unless there is reason to believe this may be prejudicial to the gathering and presentation of evidence.
- Support will also be offered to the student(s) affected and their parents or guardian. The college will consult with the children's social services, or the police as appropriate, as to how this can be done in the most suitable and effective way.

17.8 Suspension

- Suspension will not be an automatic response to an allegation and will only be considered in a case where there is cause to suspect that a student, or other students at the college, is/are at risk of significant harm, or where the allegation is so serious that it might be grounds for dismissal. The college will consider whether the result that would be achieved by suspension could be obtained by alternative arrangements, such as redeployment. A member of staff will only be suspended if there is no reasonable alternative. The college will balance the need to ensure the safety and welfare of the student with the need for a full and fair investigation. The LADO will be consulted as to the appropriate action to take.
- If suspension is deemed appropriate, the reasons and justification will be recorded by the college and the individual notified of the reasons for the suspension. The college will ensure that the suspended person is given the contact details for the representative who has been appointed to keep him or her informed about the progress of the case.
- If it is decided that the person who has been suspended should return to work, the college will consider how to facilitate this: for example, whether a phased return would be appropriate. The college may provide a mentor and will also consider how to manage contact with the student who made the allegation.

17.9 Confidentiality and information sharing

- The college will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality, in order to ensure a fair investigation with minimum impact on all parties.
- A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal offence to publish information that could lead to the identification of a member of staff who is the subject

of an allegation before they are charged with an offence. Publication includes any speech, writing, relevant programme or other communication, in whatever form, which is addressed to the public at large or any section of the public.

- The case manager will take advice from the LADO, police and 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 the parents or guardian of the student 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, or when, it arises
- Where the police are involved, wherever possible the college will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in any subsequent disciplinary process initiated by MPW.

17.10 Unsubstantiated, unfounded, false or malicious allegations

- If an allegation by a student is determined to be unsubstantiated, unfounded, false or malicious, the case manager should consider the following actions:
    - If the student who made the allegation is in need of help or may have been abused by someone else and, under such circumstances, whether a referral to student's social services is appropriate
    - whether to take disciplinary action against the student in accordance with the college's Behaviour Policy.
- If a parent has made a deliberately invented or malicious allegation the Principal will consider whether to require that parent to withdraw their child or children from the college, on the basis that they have treated the college or a member of staff unreasonably.
- Whether or not the person making the allegation is a student or a parent (or other member of the public), the college reserves the right to contact the police to determine whether any action might be appropriate.

17.11 Substantiated allegations

- If an allegation is substantiated and the member of staff, contractor or volunteer is dismissed because they are unsuitable to work with children a report to the Disclosure and Barring Service will be made promptly, and in any event within one month of the person leaving the college.
- Settlement agreements, including a form of words for a reference, will not be used in cases where a member of staff, volunteer or contractor resigns or ceases to provide his or her service, where there are allegations that indicate the person is a risk or poses a risk of harm to children. Resignation or ceasing to provide services will not prevent a referral being made to the Disclosure and Barring Service where appropriate.
- If a tutor has been dismissed, or would have been dismissed had they not resigned, in cases involving unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction for a relevant offence, the college will give separate consideration to whether a referral should be made to the Teaching Regulatory Authority. The college will follow the advice set out in the TRA documents: Teacher misconduct: information for teachers and Teacher misconduct: the prohibition of teachers (as updated from time to time) to decide whether a referral should be made.
- At the conclusion of a case in which an allegation is substantiated, the LADO will review the circumstances of the case with the case manager to determine whether any improvements could be made to the college's procedures to prevent the occurrence of similar events in the future. Consideration will also be given to how the investigation process was managed, including, where appropriate, the use of suspension

of the accused. The case manager will produce a written report that will be presented to the governors without delay.

17.12 Record keeping and references

- Details of allegations that are found to be malicious or false will be removed from personnel records, unless the individual gives their written consent for the retention of the information. For all other allegations, a comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions will be kept on the employee's file. A copy of this summary will be provided to the individual concerned. Such records will be retained at least until the employee reaches the normal pension age (or for a period of ten years from the date of the allegation, if this is longer).
- When providing employer references, MPW will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unfounded, unsubstantiated, false or malicious

18 Low-level concerns

18.1 As part of a whole college approach to safeguarding, MPW seeks to promote a culture in which all concerns about all adults working in or on behalf of the college are dealt with promptly and appropriately. The purpose of the college's low level concerns policy is to create and embed a culture of openness, trust and transparency in which our values and expectations of staff behaviour as set out in the Code of Conduct are constantly lived, monitored and reinforced by all staff.

18.2 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 has acted in a way that:

- Is inconsistent with the college's Code of Conduct, including inappropriate conduct outside of work; and
- Does not meet the allegation threshold (see 17.2) or is otherwise not serious enough to consider a referral to the LADO.

NB: The term 'low-level' does not mean that the concern is insignificant; it simply means the behaviour does not meet the allegation threshold as defined in KCSIE.

18.3 Inappropriate behaviour can exist on a wide spectrum, from that which is inadvertent or thoughtless through to that which is ultimately intended to enable abuse. Examples of such behaviour could include but are not limited to: being overly friendly with students; showing favouritism; taking photographs of students on a personal device; or using inappropriate sexualised, intimidating or offensive language.

18.4 Staff are required to report any concerns about any adult (including a person employed by a supply agency or a contractor) to the Principal. In the case of supply staff, and contractors their employers will be notified so any patterns of inappropriate behaviour can be identified. Where the concern relates to the Principal, it should be reported to the Chair of Governors. Such reports should be made without undue delay. Staff do not need to be able to determine whether their concern is a low-level concern or whether it meets the threshold of an allegation. This determination will be made by the Principal/Chair of Governors when the matter has been investigated.

18.5 The Principal will gather as much evidence as possible by speaking directly to the member of staff concerned (unless the concern has been raised anonymously), to the individual concerned and to any witnesses. If the Principal is the subject of the concern the Chair of Governors will act in a similar fashion. Full details of how low-level concerns will be investigated are set out in the "Reporting Low-Level Safeguarding Concerns" policy.

18.6 A member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff, for whatever reason, may have behaved in a manner which,

on reflection, falls short of the standard set out in the Staff Code of Conduct. Under such circumstances, the member of staff should make a self-referral to the Principal as soon as possible. Doing so demonstrates transparency, facilitates effective management of the issue and can reduce the risks of misunderstandings and false allegations.

18.7 All low-level concerns, including those determined to unfounded, will be recorded in writing by the Principal. The record will include details of the concern, the context in which the concern arose, any actions taken and decisions reached (along with the rationale for them), and the eventual outcome. The name of the individual sharing their concerns will be noted. If the individual wishes to remain anonymous, then this will be respected as far as reasonably possible. Records of low-level concerns are confidential and securely stored by the DSL in accordance with the Data Protection Act 2018 and the UK General Data Protection regulation for six years after the individual ceases to be employed by the college.

18.8 Low-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in employment references provided by the college. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to.

18.9 Records of low-level concerns will be reviewed at least termly by the DSL, Principal and Chair of Governors to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. Where a pattern of behaviour is identified consideration will be given to whether disciplinary procedures should be invoked, the matter should be escalated to the LADO and, more broadly, whether existing policies need to be revised and/or additional training is required to address wider cultural issues and minimise the risk of recurrence in the future.

19 Arrangements for dealing with peer-on-peer abuse and allegations

19.1 Most instances of students causing harm to each other will be dealt with under the college's Anti-bullying and Behaviour Policies. However, all staff should be aware that safeguarding concerns can arise as a result of conduct by a student towards another (sometimes referred to as peer-on-peer abuse). This type of abuse can happen both inside and outside of college and online. Examples of students' conduct towards each other that could raise safeguarding concerns are:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical violence 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;
- upskirting, which typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or to cause humiliation or distress. (Upskirting is now a criminal offence. Anyone of any gender can be a victim.)

- consensual and non-consensual sharing of nude and/or semi-nude images and/or videos (also known as sexting, or youth-produced sexual imagery); 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).

19.2 It is more likely that girls will be victims and boys perpetrators of peer-on-peer abuse. It is also the case that it manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

19.3 Students with Special Educational Needs or Disabilities are particularly vulnerable to peer-on-peer abuse.

19.4 Whilst sexual violence and sexual harassment are forms of peer-on-peer abuse to which the comments and measures below concerning awareness, education and reporting apply, their particular nature requires extra commentary, which is provided in section 20.

19.5 MPW has an important role in developing students' understanding of what constitutes peer-on-peer abuse and instilling behavioural norms that minimise the risk of it taking place. With this in mind, staff should be aware of the importance of:

- Not assuming peer-on-peer abuse is not occurring because known cases are rare when it may in fact be that such abuse is occurring and are simply going unreported by students;
- enforcing the college's rules, which are explicit about the high standards of behaviour and courtesy the college expects;
- implementing in a consistent way its Promoting Good Behaviour Policy;
- being clear that sexual violence or sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing any form of peer-on-peer abuse as 'banter', 'just having a laugh' or 'boys being boys' as this can lead to a culture of unacceptable behaviours and an unsafe environment for students; and
- challenging all incidents of abusive behaviour, no matter how small the incident may seem and reporting to a member of the safeguarding team in a timely fashion
- implementing the college's anti-bullying strategy.

Other strategies in place to prevent the occurrence of peer-on-peer abuse include:

- providing developmentally appropriate PSHE and RSE lessons which develop students' understanding of acceptable behaviour. Themes covered in these lessons that are particularly relevant to peer-on-peer abuse include: consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships
- having systems in place to for any students to raise concerns with staff, knowing that that their concerns will be taken seriously and that they will be listened to, believed and valued
- delivering targeted work on assertiveness and keeping safe for those students identified as being potentially vulnerable

19.6 If a student discloses that they or another student has been the victim of peer-on-peer abuse, the guidance for gathering and recording the information provided in Section 12 of this policy should be followed.

19.7 If an allegation of peer-on-peer abuse has been made the DSL must be informed as soon as possible. Where the DSL considers that the behaviour meets the local authority threshold criteria (ie where there is reasonable cause to suspect a student is suffering or is likely to suffer significant harm), the case will be referred to the local

authority using the procedures set out in this policy. The college will take advice from children's social services on when and how to inform the student about the allegations and how the investigation of allegations should be conducted. It will also take all appropriate action to ensure the safety and welfare of all students involved, including those accused of abuse. Further details on how cases of peer-on-peer abuse will be managed is contained in Part 5 of KCSIE (September 2021).

19.8 A student against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the college's policies on behaviour and discipline will apply.

19.9 If it proves necessary for a student to be interviewed by the police in relation to allegations of abuse, the college will ensure that, subject to the advice of children's social services, parents are informed as soon as possible and that an appropriate adult supports the student during the interview. If a student's parents are abroad, the student's education guardian will be asked to support the student and to accommodate him or her if they have been suspended.

19.10 Both the victim and the perpetrator will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. The DSL, as part of these procedures, will produce a welfare risk assessment which will consider the needs of all those involved (victim, perpetrator and other students at the college) and the measures that need to be taken to protect and keep them safe. When compiling the risk assessment, appropriate weight will be given to: the wishes of the victim; the nature of the alleged incident; the ages of those involved; whether the incident was an isolated one or part of a pattern; any power imbalance between the victim and perpetrator; any ongoing risks to the victim and other students; and any relevant contextual factors. Children's social services will independently risk assess the situation and any report produced by them will be used to inform and update the college's own risk assessment which, in any event, will be reviewed on a regular basis.

20 Child-on-child sexual violence and sexual harassment

20.1 Sexual violence includes acts such as sexual assault, assault by penetration, and rape (this may include an online element which facilitates, threatens and/or encourages sexual violence). A key feature of such acts is that the sexual activity takes place without the consent of the victim. Consent can only be given if an individual has the freedom and capacity to choose to participate in a sexual act.

20.2 Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline. Sexual harassment can take a wide variety of forms:

- Sexual comments, such as making lewd comments or sexualized remarks about a person's clothes or appearance, using sexualised names etc
- Physical behaviour, such as deliberately brushing against someone, interfering with clothing (flicking bra straps, lifting up skirts etc), upskirting, displaying pictures, drawings or photos of a sexual nature
- Online harassment, such as non-consensual sharing of images and videos (nudes and semi-nudes), unwanted sexualised comments and messages

20.3 Sexual violence and sexual harassment can occur between students of any age and sex. However, staff should be aware that some groups are at greater risks than others. Girls, students with SEND, and LGBTQ+ students are more likely to be victims of these types of abuse. Evidence shows that boys are more likely to be perpetrators and girls to be victims. Young people who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

20.4 Students may not find it easy to tell staff about their abuse verbally. They can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of staff may overhear a conversation that suggests a child has been harmed, or a child's own behaviour might indicate that something is wrong.

20.5 All staff will be trained to manage a report of peer-on-peer sexual violence and sexual harassment. 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, or their experience minimised.

20.6 Section 12 of this policy provides general guidance for listening to students and record-keeping. Effective safeguarding practice in the context of claims of sexual violence or harassment further requires the following:

- If possible, reports should be managed with two members of staff present, (preferably one of them being the Designated Safeguarding Lead or a Deputy).
- Where the report includes an online element, staff should know and following the searching, screening and confiscation advice (for schools) and UKCIS advice on sharing nudes and semi-nudes. **The key consideration is for staff not to view or forward illegal images of a child.** The UKCIS advice 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.
- The recognition that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so students may not be able to recall all details or timeline of abuse.

20.7 The college will respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the college. The DSL/DDSLs are likely to have a complete safeguarding picture and be the most appropriate people to inform the college's initial response. Important considerations will include: the wishes of the victim in terms of how they want to proceed; the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB (harmful sexual behaviour) has been displayed; the ages of the children involved; the developmental stages of the children involved; any power imbalance between the children (eg whether the alleged perpetrator(s) significantly older, more mature or more confident); whether the victim has a disability or learning difficult; whether the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature); that sexual violence and sexual harassment can take place within intimate personal relationships between peers; whether there are ongoing risks to the victim, other children, adult students or school or college staff; and, other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

20.8 The DSL will reach a judgement about which of the following four ways is the most appropriate for handing the case:

- Internal management: handled entirely within the college.
- Early help: where the students concerned do not require referral to statutory services but may benefit from assistance from an external agency.
- Children's social care: where a child has been harmed, is at risk of harm, or is in immediate danger.
- Report to the police: in addition to the above, where the seriousness of the concern merits it.

In all but the first circumstance, how the case is managed will be determined in conjunction with the local authority MASH (Multi Agency Safeguarding Hub) team and/or the police. The college will follow the guidance as set out in detail in KSCIE (2021), Part 5.

20.9 Sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Where students have a health need arising from sexual assault or abuse, the college will assist them in gaining access to suitable specialist support services.

20.10 If a report of sexual violence or sexual harassment is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider if disciplinary action should be taken against the pupil who made the allegation and/or whether a referral to children's services is appropriate.

21 Other safeguarding arrangements

21.1 Mental health

All staff should also be 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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe students 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.

Where young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by raising the issue with the DSL, who may in turn contact an appropriate external agency. Further details are provided in the college's Mental Wellbeing Policy.

21.2 Teaching students to keep themselves safe

The college is committed to raising awareness of personal safety whenever the opportunity arises. This includes highlighting general health and safety matters in and around the college as well as in the wider world and educating students about specific safeguarding issues, such as staying safe online (including when they are accessing remote learning), radicalisation, grooming, child sexual exploitation, child criminal exploitation, healthy relationships, mental health, substance misuse, bullying and sexting. These issues are explored in a variety of contexts, including academic and PSHE lessons and in individual pastoral meetings with Personal Tutors. Staff are also aware of the ongoing need to promote fundamental British values as a means of building resilience to the risks of radicalisation. A range of written and online resources are also provided to students when they join the college (Student Handbook, Acceptable use of IT Policy and a booklet on mental health and wellbeing). Students are specifically taught how to identify risks and how to modify behaviour to mitigate these risks.

21.3 Online safety

The widespread use of digital communications technologies, such as personal mobile devices and the internet, presents young people with a host of opportunities for learning, participation, creativity and self-expression. At the same time, it allows students to access and transmit harmful content along with being a means to harass and bully their peers. The age range of our students means that we do not ask that students do not bring mobile devices to college. Students are not allowed to use mobile devices within lessons and in the libraries but their use is otherwise permitted the college buildings. Students who use the college's Wi-Fi must login with their MPW details and thereby register their phones. The college has a range of filtering systems in place to keep students safe when accessing the internet via, and usage is also monitored (see the college's E-safety Policy for further details). The college recognises, however, that students may use their 3G/4G/5G connection and bypass its filters. Our focus therefore is to teach students about the dangers. The safe use of technology is a focus in all areas of the curriculum and key ICT safety measure are routinely reinforced in lessons and at pastoral events. All students have to read and sign the Acceptable Use of IT policy.

In our policies and guidance for students, we follow the "4Cs" classification of areas of risk regarding online safety:

1. **Content:** Being exposed to illegal, inappropriate or harmful online content such as spam, pornography, fake news, substance abuse, violence, misogyny, anti-Semitism, racism, radicalisation and extremism, and lifestyle sites that promote anorexia, self-harm or suicide.
2. **Contact:** Being subjected to harmful online interaction with other users. Examples include: peer-to-peer pressure, exposure to viruses and malware, anonymous online chat sites, cyber-bullying commercial advertising, personal data or identity theft, cyber-stalking, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
3. **Conduct**: Personal online behaviour that increases the likelihood of being harmed oneself or causing harm to others. Examples include threats to: health and well-being, such as gaming or social network addiction; online disclosure of personal information and ignorance of privacy settings; online bullying; making, sending and receiving explicit images (eg consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images); and illegal conduct, including hacking, plagiarism, and copyright infringement of digital media, such as music and film.
4. **Commerce:** Risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

21.4 Mobile phones and cameras

The college provides mobile phones for trips and cameras for taking photographs when necessary. Mobile phones should not be used when supervising or teaching students except in cases of emergency or for the completion of electronic class registers. Images of student must not be taken or stored on any personal mobile phone. If a phone is to be used for college blogs or Twitter whilst on educational visits, permission must be obtained from the Principal and reference to their use and subsequent safety of data must be referred to in the trip risk assessment.

Photographs and videos are taken of students by staff for a variety of purposes, including displays of work/activities, personal records of achievement and for the college website and newsletter. Written permission is obtained when a student joins the college and this also indicates the level of consent, including where images may be used (personal records only or personal records and on the college website and in college publications). The DSL will ensure that all staff are aware of the names of students who may not be photographed or where there is limited consent. Images of students on the website will not be named. Images may only be captured on college cameras and the images may only be stored on those cameras and on the college's password-protected computers. Once images have been transferred from a camera onto a computer the images should be deleted from the camera immediately. Additional copies may be stored on flash drives, but these must be stored securely in a locked cupboard. Images must not under any circumstances be transmitted by staff to other individuals over the internet.

When taking photographs or recording video footage, staff should have regard to the following guidance:

- all students must be appropriately dressed
- images that only show a single student with no surrounding context should be avoided: photographs of three or four students are more likely to include the learning context
- use photographs that represent the diversity of students participating
- do not use images that are likely to cause distress, upset or embarrassment

- do not use images of a student who is considered vulnerable, unless parents or a guardian have given specific written permission

The SLT will review (at least annually), stored images and delete unwanted and out-of-date material.

Parents should be made aware of the need for sensitivity and respect when filming/photographing events featuring their own child or children. Staff should monitor the use of cameras at these events and ask anyone behaving inappropriately to cease filming/taking photos.

21.5 Risk assessment

The college recognises that the evaluation of risks and putting in place measures to mitigate those risks contributes to promoting the welfare and protection of students. Risk assessments may pertain to the whole college, to specific curricular or extra-curricular activities that have hazards associated with them, or to individual students or staff. The procedures for conducting, recording and monitoring risk assessments are set out in full in the college's Risk Assessment Policy.

21.6 Staff recruitment

The college is committed to safer recruitment processes. Members of teaching and non-teaching staff at the college, including part-time staff, temporary and supply staff, and visiting staff such as musicians and sports coaches are subject to the background checks required under the Education (Independent School Standards) Regulations 2014 and in accordance with the latest version of KCSIE. For most appointments, an enhanced DBS check with 'barred list' information will be required. At least one member of any staff recruitment panel will have had Safer Recruitment training. The college's separate Recruitment, Selection and Disclosure Policy contains further details about how the process of staff recruitment is conducted.

21.7 Children missing education procedures

All staff are aware that children going missing, particularly repeatedly, is a potential indicator of a range of safeguarding issues such as: neglect, sexual abuse or exploitation, child criminal exploitation, mental health problems, substance abuse, travelling to conflict zones, female genital mutilation or forced marriage. The college has clear procedures in place for following up on unexplained absences and, where necessary, reporting to the Local Authority students who are missing from college for more than 10 school days (continuous). The procedure includes the requirement to record any incident, the action taken and the reasons given by the student for being missing.

The college has a legal duty to inform the Local Authority if a student is to be removed from the roll at a non-standard transition point; ie, where a compulsory school-aged student leaves the college before completing the college's final year. When this notification is made the following information has to be provided by the college: full name of the student; name, address and telephone number of the parent the student lives with; details of any new address for the child and parent; the name of the student's destination college and expected start date; and the reason why the student is leaving the college.

The college is also legally required to notify the Local Authority within five days of adding a student's name to the admissions register at a non-standard transition point. The notification includes all the details contained in the admissions register for the new student; specifically, their full name; sex; name and address known to be a parent of the student (and an indication of which parent the student normally lives with and which parents hold parental responsibility); address of new or additional places of residence; at least one contact telephone number at which the parent can be contacted in an emergency*; date of birth; name and address of last college attended (if any); and details of whether they are a boarder or a day student.

**Note: In line with KCSIE 2021, it is the college's policy to hold a minimum of two emergency contact numbers for each student.*

21.8 The Prevent Duty

All colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, to have "due regard" to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. There are four specific elements to MPW's approach to meeting the statutory requirements imposed by the Prevent duty. In summary these are:

- Risk assessment – working with the Local Authority, who provide contextual information about the area, the college assesses the risk of students being drawn into terrorism, including extremist ideologies
- Working in partnership – liaising closely with the LSCP to ensure students requiring support are referred at a suitably early stage
- Staff training – enabling staff to identify students at risk of being drawn into terrorism and to challenge extremist ideas
- IT policies – to provide guidance to students as to how to stay safe online (see the college's Acceptable Use Policy) and set out the filtering and monitoring mechanisms in place.

MPW's Prevent Policy contains further details about how the college fulfils the statutory requirements imposed by the Prevent Duty.

21.9 Visiting speakers

Any student or member of staff who wishes to invite a speaker to address students must provide details of the individual to the SLT in order that they may carry out a vetting procedure. The event organiser or, if the organiser is a student, a member of the SLT, will undertake a search via the internet to research the background of the individual and consider taking up references from other schools at which they have spoken at in the past. The event organiser should also consider carefully whether the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups. In these circumstances the event will not be allowed to proceed.

It is not necessary to undertake a DBS check on every speaker. In cases where specific vetting checks are not prescribed by KCSIE, the visiting speaker will be accompanied at all times by a member of staff to ensure there is no unsupervised access to students. However, if a DBS check is deemed necessary, the appropriate details will be recorded on the college's SCR.

21.10 Confidentiality and information sharing

The college will keep all child-protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The college will co-operate with police and children's social services to ensure that all relevant information is shared for the purposes of child-protection investigations.

Where a student who is subject to a child-protection plan is moving to another school, the DSL will ensure their child-protection file is securely transferred as soon as possible. This file will be transferred separately from the main student file to the DSL at the new school and confirmation of safe receipt will be obtained. The DSL should also consider if it would be appropriate to share any information with a new school in advance of a student leaving: for example, information that would allow the new school to continue supporting victims of abuse and have support in place for when the student arrives. Where allegations have been made against staff, the college will consult with the LADO and, where appropriate, with the police and social services to agree the information that should be disclosed and to whom.

Information sharing is essential in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including educational outcomes. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must

not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Information that is relevant to safeguarding is regarded as 'special category personal data' and as such can be shared securely on a need-to-know basis. Further non-statutory guidance Information Sharing was published by the Government in July 2018. See Appendix 4.

21.11 Whistleblowing

All staff are required to report to the Principal any concerns about:

- poor or unsafe safeguarding practices at the college;
- potential failures by the college or its staff to properly safeguard the welfare of students; or
- other wrongdoing in the workplace that does not involve the safeguarding and welfare of students.

If the member of staff feels unable to raise their concern with the Principal (or a member of SLT) or if they believe any concern has not been dealt with, they should contact the Chair of Governors. The NSPCC whistleblowing advice line is available for staff who do not feel able to raise safeguarding concerns internally (see section 1 for contact details). Any member of staff can whistleblow without fear of detriment (retribution or disciplinary action), provided the report was made in good faith. Malicious allegations may be considered as a disciplinary offence.

21.12 College premises, security and visitors

- The college will take all practicable steps to ensure that all college buildings are as secure as circumstances permit. The college buildings have CCTV cameras at their main entrances and other locations. Staff and students need to use their staff or student cards as swipe cards to gain access to college buildings.
- All staff are identified by photo ID cards worn at all times during college-related activities and duties. An electronic Visitors' Book is kept at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on college premises by a member of staff. All visitors will be given a name badge with the title 'Visitor', which must be clearly displayed and worn at all times whilst on the college's premises.

21.13 Monitoring this Policy

- Any child protection incidents at the college will be followed by a review of the safeguarding procedures in the college and a report to the governors. Where an incident involves a member of staff, the LADO will be asked to assist in this review, to determine whether any improvements can be made to the college's procedures. The DSL will monitor the content and operation of this policy and present an annual report to the MPW Board.
- The DSL will monitor the operation of this policy and procedures on a day-to-day basis and will provide regular updates at Senior Leadership Team meetings. In addition, the DSL will present a monthly report to the governors, as part of the Principal's Report.
- The MPW Board will undertake an annual review of the policy and implementation of its procedures including good co-operation with local agencies and of the efficiency with which the related duties have been discharged. The governors will draw on the expertise of staff, including the DSL, when considering amendments to policies and/or arrangements related to safeguarding.
- Any deficiencies or weaknesses in child protection and safeguarding arrangements identified at any time will be remedied without delay.

21.14 Other relevant policies

The following policies should be read in conjunction with this policy:

- Anti-Bullying Policy
- Health and Safety Policy

- Educational Visits Policy
- Recruitment, Selection and Disclosure Policy
- Staff Code of Conduct (with Low-Level Concerns Annex)
- Policy for Promoting Good Behaviour
- Cyber-bullying Policy
- E-Safety Policy
- ICT acceptable Use Policy
- Whistleblowing Policy
- Supervision Policy
- Missing Student Policy
- Mental Health and Wellbeing Policy
- Prevent Duty Policy
- Relationships and Sex Education Policy

Appendix 1: Other types of abuse

- **Children missing from education:** all children of compulsory school age, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special needs they may have. A child going missing from education can act as a vital warning sign of a range of safeguarding possibilities. These include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation (FGM), 'honour'-based abuse or risk of forced marriage. The college will report to the Local Authority instances of prolonged unauthorised absence or a student being removed from the college roll under the circumstances outlined in KCSIE. In cases where a student has a prolonged period of authorised absence for a reason such as long-term illness, the college will be proactive in terms of providing support to both the parents and the student.

- **Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE):** Both CCE and CSE are forms of abuse that occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 (a) in exchange for something the victim needs or wants (for example, food, drugs, alcohol money or affection) and/or (b) for the financial advantage or increased status of the perpetrator or facilitator and/or (c) through violence or threat of violence. An imbalance of power is commonly associated with age difference, it can also be due to a range of other factors including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic and other resources.

  Perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation. More detailed definitions of CCE and CSE are given below:

  - **CSE** occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. The victim (male or female) may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (eg through others copying videos or images they have created and posted on social media).
  - **CCE** is where is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or being forced or manipulated into threatening/committing serious violence to others.

- **County lines:** "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". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults 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 be targeted and recruited

into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. If a child is suspected to be at risk or involved in county lines, a safeguarding referral should be considered (via the National Referral Mechanism) alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

- **Children and the court system:** Children are sometimes required to give evidence either as witnesses in the criminal courts or as part of family court procedure. This can be stressful and may reflect existing conflict and difficulties in the family. Staff members should be aware that any child who is involved in the court process may be at risk of a particular safeguarding issue. The Ministry of Justice has produced age appropriate guides for children who may have to give evidence in the criminal courts.

- **Children with family members in prison:** Children with a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. National Information Centre on Children of Offenders provides information designed to support professionals working with offenders and their children to help mitigate the negative consequences for those children.

- **Cybercrime**. Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

    - unauthorised access to computers (illegal 'hacking');
    - denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and
    - making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

  Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the Designated Safeguarding Lead (or a Deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It 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.

- **Domestic abuse:** Domestic abuse includes any incident or pattern of incidents involving: physical or sexual abuse; violent or threatening behaviour; controlling or coercive behaviour, economic abuse; psychological, emotional or other abuse. For the definition to apply, both parties must be aged 16 or over and personally connected. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status sexuality or background. Domestic violence can take place inside or outside the home.

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. Exposure to domestic abuse and/or violence 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.

When young people experience domestic abuse within their own intimate relationships, this is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators offered support.

- **Homelessness:** Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare. The DSL and deputies are aware of contact details and referral routes in to the Local housing Authority so that they canraise /progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour as well as the family being asked to leave a property. In most cases college staff will be considering homelessness in the context of children who live with their families and intervention will be on that basis. However, it should be recognised that some 16 and 17 year olds may be living independently for example, having being excluded from the family home and will require a different level of intervention and support. Children's services will be the lead agency for those young people and the DSL or deputy should ensure appropriate referrals are made based on the student's circumstances.

- **Serious violence:** All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from 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 children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

- **Honour-based abuse (HBA).** So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse, are illegal in the UK (regardless of the motivation) and should be handled and escalated as such.

    - **FGM:** FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Victims of FGM are likely to come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

      All staff must be aware of the law requiring tutors to report cases to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl aged under 18. The duty to report resides with the tutor who becomes aware of the case not the DSL, although the DSL should be informed unless the tutor has a good reason for not doing so. The report

should be made orally by calling 101 within 24 hours of the issue coming to light. Failure to report a case of FGM can result in disciplinary sanctions.

- **Forced marriage**: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent is where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

- **Modern slavery:** Modern slavery encompasses human trafficking and slavery, servitude, forced or compulsory labour. Exploitation can take many forms, including, sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal or organs. The modern slavery statutory guidance provides more information on how to identify and support victims.

- **Radicalisation and extremism: "**Radicalisation" refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. "Terrorism" is defined as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat 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. "Extremism" is defined in the Prevent strategy as vocal or active opposition to fundamental British 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. Extremist views may result in terrorist activity which is where is an action or actions endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts electronic systems. The use of threat of terrorist activity must be designed to influence the government or intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

  There are various reasons why a young person might become interested in extremism:

  - a search for answers to questions about identity, faith and belonging
  - a desire for 'adventure' and excitement
  - a desire to enhance self-esteem of the individual and promote 'street cred'
  - the discovery of and identification with a charismatic individual and, through them, attraction to a group which can offer identity, social network and support
  - a sense of grievance that can be triggered by personal experiences of racism or discrimination

  The college has a legal duty to have due regard to the need to prevent people from being drawn into terrorism and this is an aspect of safeguarding. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. Schools should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

  There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in behaviour which could indicate that they may be in need of help or protection. Young people at risk of radicalisation may display different signs or seek to

hide their views. college staff should use their professional judgement in identifying young people who might be at risk of radicalisation and discuss their concerns with the DSL.

On the basis of this information the DSL may conclude that a referral to the Channel Programme is appropriate. Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It is run in every local authority and addresses all kinds of extremism including the extreme-right and Islamist-related. The support provided could include assistance with education or employment, and ideological mentoring to provide vulnerable individuals with skills to protect themselves from being drawn into extremism. An individual's engagement with the programme is entirely voluntary at all stages.

- **Sharing nudes and semi-nudes**. The term 'sharing nudes and semi-nudes' refers to the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. It is also known by the names 'youth-produced sexual imagery' or 'sexting'. While sharing photos and videos online and via smartphones is part of daily life for many people, enabling them to share their experiences, connect with friends and **record** their lives, there are risks associated with the production and distribution of sexual and explicit images both in terms of the law (Protection of Children Act 1978, as amended by the Sexual Offences Act 2003) and in relation to the possible impact on a child's well-being if images are shared more widely than they originally intended.

  Creating and sharing sexual photos and videos of under-18s is illegal. Also, consensual and non-consensual sharing of nude or semi-nude images and/or videos can be an indicator that children are at risk. Consequently, a member of the DSL team should be notified as soon as possible if an incident comes to light in which a student under the age of 18:

  - has created and shared sexual imagery of themselves with a peer under the age of 18;
  - has shared sexual imagery created by another person under the age of 18 with another person; or
  - is in possession of sexual imagery created by another person under the age of 18.

  Management of an incident. Any direct disclosure by a student should be taken seriously. Students who make such disclosures are likely to be embarrassed and worried about the consequences. Typically, they will have tried to handle the problem themselves and they will consider notifying a member of staff as a last resort. Given the potential seriousness of the situation, the DSL must be informed as soon as possible. The DSL will conduct an initial review, which will include meeting relevant staff and the students, to consider:

  - whether there is an immediate risk to any child or young person;
  - if a referral should be made to the police and/or children's social care;
  - if it is necessary to view the image(s) in order to safeguard the student **– in most cases, images or videos should not be viewed**;
  - what further information is required to decide on the best response;
  - whether the image(s) has been shared widely and via what services and/or platforms;
  - whether immediate action should be taken to delete or remove images or videos from devices or online services or to confiscate the device used (if possible);
  - any relevant facts about the student involved which would influence the DSL's risk assessment; and
  - whether to inform the parents informed or whether involving them would put young person at risk of harm.

Viewing the Imagery. Staff **must not** ask to see the imagery but should confiscate the device on which it is held and pass it on to the DSL. If a device is confiscated, it should be turned off and locked away securely until it is passed on to the DSL or an external agency such as the police. Staff must not intentionally view any nudes and semi-nudes unless there is good and clear reason to do so. The decision to view any imagery should be based on the professional judgement of the DSL. Imagery should never be viewed if the act of viewing will cause significant distress or harm to those involved. The DSL must further be satisfied that it is the only way to make a decision about whether to involve other agencies, i.e. that it is necessary (i) to contact a reporting agency (such as the IWF) to have it taken down; or (ii) to support the student or parent in making a report; or (iii) or that is unavoidable because the student has shown it directly to a staff member or because the imagery has been found on college equipment. Along with our own Safeguarding and Child Protection procedures, the college will follow the advice given in *Sharing nudes and semi nudes: advice for education settings working with children and young people (December 2020)*.

Referral. Once the DSL has sufficient information, a decision will be taken over whether the matter should be dealt with internally or referred to children's social care and/or the police. The DSL will be informed by the need to ensure the welfare and protection of the student. Records will be kept of the information available and the rationale for any decisions taken.

A referral will always be made to children's social care and/or the police immediately if the incident involves:

- involves an adult.
- If there is reason to believe that a young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent
- What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- You have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming

Support. It is vital that continuing support be given to the student so that they know they are not alone. Students must be advised on how to report sexual images or videos, how to get them taken down and how to delete it from their accounts. Students must also be made aware of the importance of not sharing the image further. Most online service providers offer a reporting function for account holders and some offer a public reporting function to enable a third party to make a report on behalf of the child or young person. Students can use the IWF and Childline's Report Remove tool to report images and videos they are worried have been, or might be, shared publicly.

Deletion of imagery. If the college decides that other agencies do not need to be involved, then consideration should be given to deleting nudes and semi-nudes from devices and online services to limit any further sharing. In most cases, students should be asked to delete the imagery and to confirm that they have deleted them. Any decision to search a student's device and delete imagery should be based on the professional judgement of the DSL.

Recording incidents. All incidents relating to nudes and semi-nudes being shared need to be recorded. This includes incidents that have been referred to external agencies and those that have not been reported out to police or children's social care. Copies of imagery should not be taken.

Appendix 2: Further information on signs of abuse

Physical abuse

Physical signs	Behavioural signs
• Unexplained bruises and welts on the face, throat, arms, buttocks, thighs or lower back in unusual patterns or shapes which suggests the use of an instrument • Unexplained burns, especially burns found on palms, soles of feet, abdomen or buttocks • Scald marks: immersion burns produce 'stocking' or 'glove' marks on feet and hands or upward splash marks, which may suggest hot water has been thrown over a child • Human bite marks • Broken bones	• Behavioural extremes (withdrawal, aggression or depression) • Unbelievable or inconsistent explanations of injuries • Fear of parents being contacted • Flinching when approached or touched • Truancy or running away from home

Emotional abuse

Physical signs	Behavioural signs
• Eating disorders, including obesity or anorexia • Speech disorders (stammering) • Nervous disorders (rashes, hives, facial tics, stomach aches)	• Fear of parent being approached • Fear of making mistakes • Developmental delay in terms of emotional progress • Cruel behaviour towards children, adults or animals • Self-harm • Behavioural extremes, such as overly compliant/demanding, withdrawn/aggressive, listless/excitable

Sexual abuse

Physical signs	Behavioural signs
• Torn, stained or bloody underclothes • Pain or itching in genital area • Bruises or bleeding near genital area or anus • Sexually transmitted infections • Pregnancy • Discomfort when walking or sitting down	• Self-harm • Sexual knowledge or behaviour (promiscuity) that is beyond their age/developmental level • Sudden or unexplained changes in behaviour • Avoidance of undressing or wearing extra layers of clothing • Truancy • Regressive behaviours (bed-wetting or fear of dark)

Neglect

Physical signs	Behavioural signs
• Height and weight significantly below age level • Poor hygiene (lice, body odour etc) • Inappropriate clothing for weather conditions • Indicators of prolonged exposure to the elements (sunburn, chapped extremities, insect bites) • Constant hunger, sometimes stealing food from others	• Erratic attendance at college • Chronic hunger or tiredness • Having few friends • Assuming adult responsibilities

Child sexual exploitation

Physical signs	Behavioural signs
• Tiredness or mood swings • Bruising • Sexually transmitted diseases • Pregnancy	• Sudden decline in college performance, punctuality, attendance • In possession of expensive goods • Going to place they cannot afford • Age-inappropriate clothing • Inappropriate sexualised behaviour • Secretive • Deterioration in mental well-being • Mixing with older people • Misuse of drugs and alcohol

Child criminal exploitation and county lines

Physical signs	Behavioural signs
• *See sections on physical and sexual abuse* • Carrying weapons • Have been the victim or perpetrator of serious violence (eg knife crime) • Exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection • Found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity; owe a 'debt bond' to their exploiters • Have their bank accounts used to facilitate drug dealing	• Self-harming • Persistently going missing from college or home and/or being found out of area • Deterioration in mental well-being • Unexplained acquisition of money, clothes or mobile phones • Excessive receipt of texts/phone calls and/or having multiple handsets • Relationships with controlling older individuals or groups • Significant decline in college performance • Gang association or isolation from peers or social networks • Involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs

Female genital mutilation

Physical signs	Behavioural signs
• Difficulty walking, sitting or standing • Bladder or menstrual problems • Severe pain and bleeding • Infections such as tetanus, HIV and hepatitis B and C	• Abroad for a prolonged period • Unusual behaviour after a period of absence • May talk of a 'special procedure' or 'special occasion to become a woman' • Spending longer periods in the bathroom • Reluctance to undergo normal medical examinations

Forced marriage

Physical signs	Behavioural signs
• Cut or shaved hair as a form of punishment for being disobedient	• Absence from college • Failure to return from visit to country of origin • Self-harm or attempted suicide • Running away from home • Early marriage of siblings • Sudden announcement of engagement to a stranger • May talk of a 'special procedure' or 'special occasion to become a woman' • Spending longer periods in the bathroom • Reluctance to undergo normal medical examinations

Grooming

Physical signs	Behavioural signs
See section on sexual abuse	• Spending increasingly prolonged time online • Having older boyfriends or girlfriends • Secretiveness about who they are talking to online and what sites they visit • Possession of electronic devices such as mobile phones or webcams that parents have not provided • Engaging less with their usual friends • Using sexual language that you would not expect them to know • Going to unusual places to meet people • Using drugs and/or alcohol • Going missing from home or college

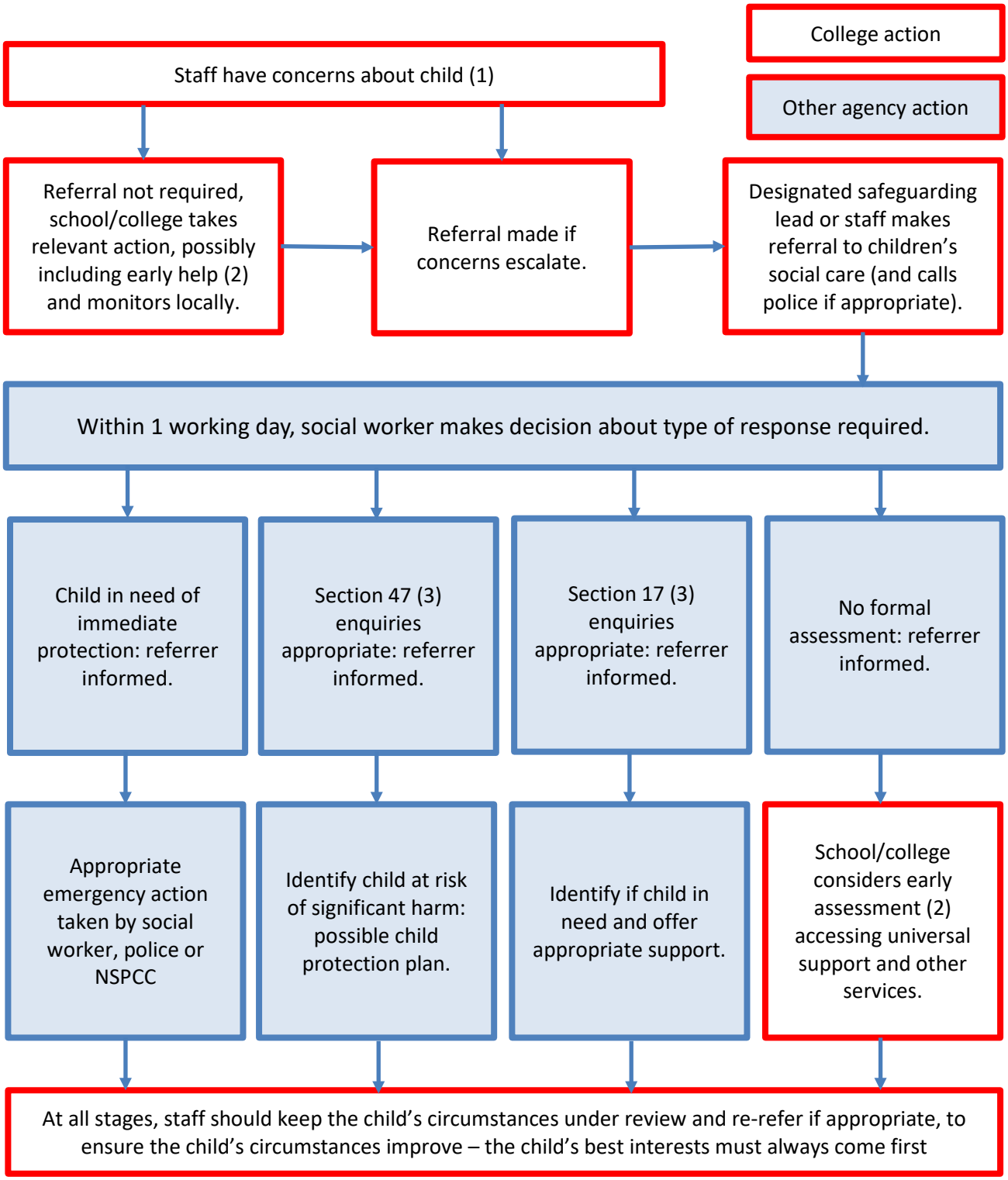
Radicalisation

Physical signs	Behavioural signs
• out of character changes in dress, behaviour, and peer relationships	• Showing sympathy for extremist causes • Glorifying violence • Evidence of possessing illegal or extremist literature • A sudden disrespectful attitude towards others • Increased secretiveness, especially in relation to internet use • Unwillingness or inability to discuss their views • Increasingly judgemental or argumentative • Advocating messages similar to illegal organisations such as 'Muslims Against Crusades' or other non-proscribed extremist groups such as the English Defence League

Broad government guidance on the following is also available via the GOV.UK website (see Part one: Keeping children safe in education September 2021)

- bullying, including cyberbullying
- children missing education
- child missing from home or care
- child sexual exploitation
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate
- mental health
- missing children and adults
- private fostering
- preventing radicalisation
- relationship abuse
- sexting
- trafficking

Appendix 3: Actions where there are concerns about a child (KCSIE, September 2021)

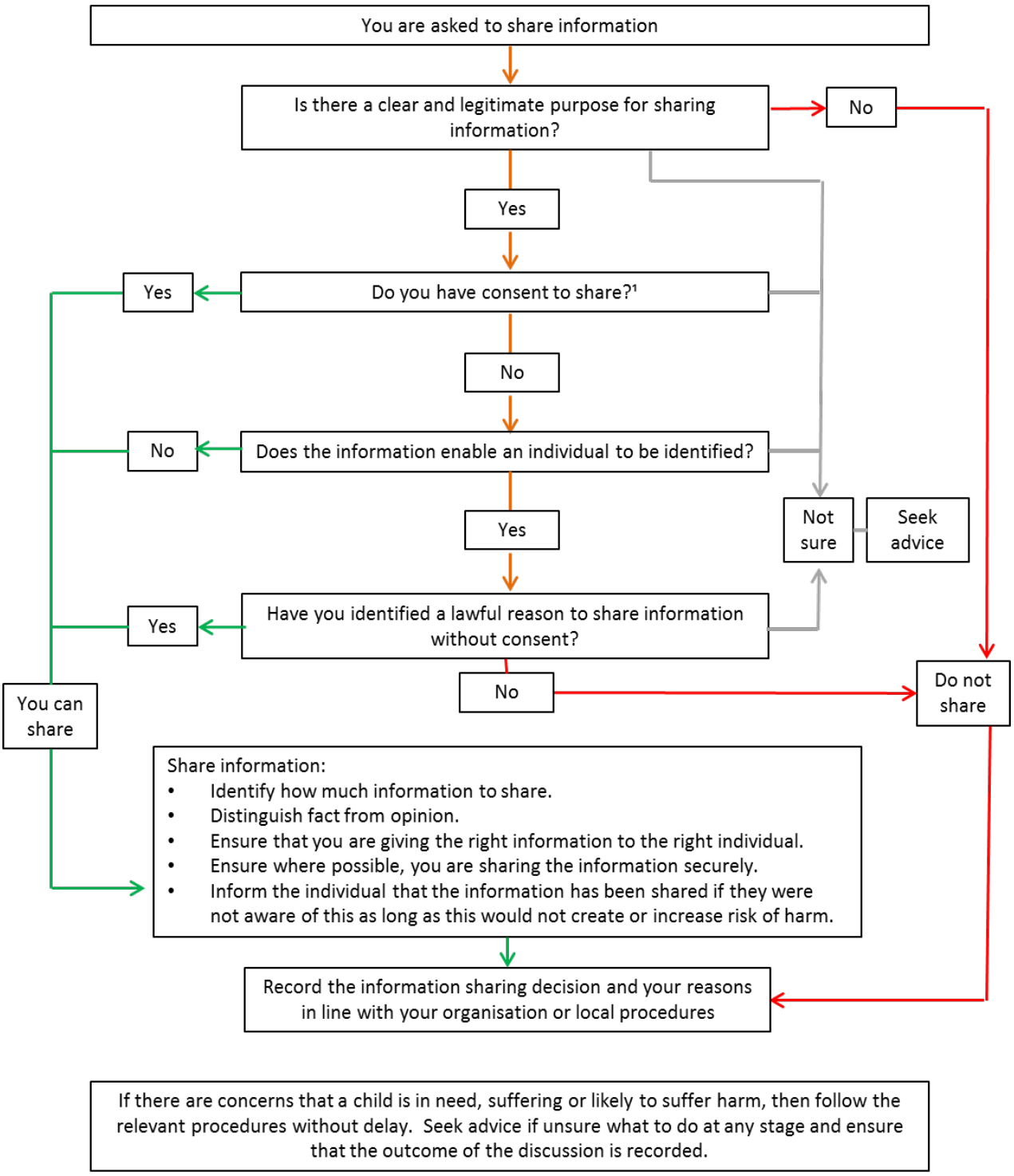


1. Cases where there is a concern or allegation made against a staff member refer to the Principal or LADO (see Section 15)

2. Early help involves providing support as soon as problem emerges. Where coordinated early help is required, an early help inter-agency assessment will be arranged.

3. Referrals will follow the processes set out in Local Safeguarding Partnership's threshold guidance

Appendix 4: Flowchart of when and how to share information



If there are concerns that a child is in need, suffering or likely to suffer harm, then follow the relevant procedures without delay. Seek advice if unsure what to do at any stage and ensure that the outcome of the discussion is recorded.

Appendix 5: DSL Job Description

Job description for the Designated Safeguarding Lead (DSL and DDSLs)	
The College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment	
Summary of the role	• To take lead responsibility for safeguarding and child protection (including online safety) occurring at the College and to support all other staff in dealing with any child welfare and child protection concerns that arise. • To provide advice and support to other staff on matters of child welfare, safeguarding and child protection. • To take part in strategy discussions and inter-agency meetings and to support other staff to do so, and to contribute to the assessment of students. • To promote and safeguard the welfare of students in the College. • Whilst the activities of DSL can be delegated to appropriately trained deputies (DDSLs), the ultimate lead responsibility for child protection remains with the DSL. This lead responsibility cannot be delegated.
Main duties and responsibilities	***Further specifics:***
Availability	You are expected to: • ensure during term time that you or a Deputy will always be available during College hours (8am – 6pm) to discuss any safeguarding concerns; and • arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.
Managing referrals	You are expected to refer cases: • of suspected abuse and neglect of any student at the College to the local authority children's social care and support staff who make referrals to local authority children's social care; • to the Channel programme where there is a radicalisation concern and support staff who make referrals to the Channel programme; • where a person is dismissed or left due to risk/harm to a child to Disclosure and Barring Service (**DBS**); and • where a crime has been committed to the Police.
Working with others	You are expected to: • act as a source of support, advice and expertise for all staff; • act as a point of contact with the local safeguarding partners; the clinical commissioning group; and the Police; • liaise with the Principal to inform him of issues; especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations; • as required, liaise with the "case manager" (as per Part 4 of KCSIE) and the designated officer (LADO) at the local authority for child-protection concerns in cases which concern a staff member;

	• liaise with staff (especially tutors, pastoral support staff, IT staff, First Aiders, counsellors and the named persons with oversight for SEND) on matters of safety, safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically; • promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances; and • 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. This includes: o ensuring that the College knows who its cohort of children are who have or have had a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and, o supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
Information sharing and managing the child protection files	You are expected to: • ensure that child protection files are kept up to date. • ensure that information is kept confidential and stored securely. • ensure that records include: o a clear and comprehensive summary of the concern; o details of how the concern was followed up and resolved; and o a note of any action taken, decisions reached and the outcome. • ensure that files are only accessed by those who need to see them and that where the file or content within it is shared, this happens in line with information-sharing advice, as set out in Part 1 and Part 2 of KSCIE. • ensure, when a student leaves the college, that: o their child protection file is transferred to the new school or college as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term); and o their child protection file is transferred separately from the student's main file in a secure manner and confirmation of receipt is received from the destination school or college; and • consider whether it is appropriate to share any information with the new school or college in advance of the student leaving.
Raising awareness	You are expected to: • ensure each member of staff has access to, and understands, the College's safeguarding policy and procedures, especially new and part-time staff; • ensure the College's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Board regarding this,

	• ensure the safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the College in this; • link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and • 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 College leadership staff.
Training, knowledge and skills	You are expected to ensure your child protection training and that of the DDSLs is sufficient and appropriate to provide the knowledge and skills required to carry out this role. This training must be updated every two years. All members of the DSL team should also undertake Prevent awareness training. In addition to the formal training, the knowledge and skills of members of the DSL team should be supplemented and refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so that they: • understand the assessment process for providing early help and statutory intervention, including local criteria for action and local-authority children's social care referral arrangements; • have a working knowledge of how local authorities conduct a 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 importance of the role the Designated Safeguarding Lead has in providing information and support to children social care in order to safeguard and promote the welfare of children; • understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in response to this in promoting educational outcomes; • are alert to the specific needs of children in need, those with Special Educational Needs and Disabilities (SEND), those with relevant health conditions and young carers; • understand the importance of information sharing, both within the college, and with the three safeguarding partners, other agencies, organisations and practitioners; • understand and support the college with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation; • are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at college; • can recognise the additional risks that children with SEN and disabilities (SEND) face online (for example, from online bullying, grooming and radicalisation) and are confident they have the capability to support SEND children to stay safe online; • obtain access to resources and attend any relevant or refresher training courses; and • encourage a culture among all staff of listening to students and taking account of their wishes and feelings , in any measures the College may put in place to protect them.

Providing support to staff	Training should support the Designated Safeguarding Lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child-protection matters. This includes, specifically, to: • ensure that staff are supported during the referrals processes; and • support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
Understanding the views of children	It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to: • encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the college may put in place to protect them; and, • understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.
Holding and sharing information.	The critical importance of recording, holding, using and sharing information effectively is set out in Parts 1, 2 and 5 of KCSIE, and therefore members of the DSL team should: • understand the importance of information sharing, both within the college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners; • understand relevant data-protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation; and • be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.