POLICY TITLE: Child Protection and Safeguarding

STATUS: Statutory

DATE OF REVIEW: September 2023

Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated Safeguarding Lead (DSL)	Jyoti Pankhania Assistant Principal	jpankhania@latimer.org.uk 01536 720300
Deputy DSL	Heidi Angel LAC/EHA Lead	hangel@latimer.org.uk 01536 720300
Data Protection Officer	Debbie Castley	dcastley@latimer.org.uk 01536 720300
Lead for Mental Health	Jyoti Pankhania Assistant Principal	jpankhania@latimer.org.uk 01536 720300
Prevent SPOC	Jyoti Pankhania Assistant Principal	jpankhania@latimer.org.uk 01536 720300
Our Designated Teacher for Looked After Children	Heidi Angel LAC/EHA Lead	hangel@latimer.org.uk 01536 720300
The Principal – Kathryn Murphy is responsible for allegations made against staff		mail@latimer.org.uk 01536 720300
Local authority designated officer (DO)		ladoreferral@nctrust.co.uk LADOConsultations@nctrust.co.uk
Nominated Safeguarding Governor	Carol Taylor	Governors@latimer.org.uk
Multi-Agency Safeguarding Hub (MASH):	MASH@northamptonshire.gov.uk https://www.nctrust.co.uk/help-and-protection-for-children/Pages/report-a-concern.aspx **0300 126 7000 (option 1)** In an emergency outside office hours, contact the Emergency Duty Team or the Police: **01604 626938**	
Channel Helpline		**020 7340 7264**

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1. Aims

The College aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare

- All staff are aware of their statutory responsibilities with respect to safeguarding

- Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2023) and Working Together to Safeguard Children (2018), Northamptonshire Safeguarding Children Partnership Guidance (2023) and the Governance Handbook We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002

- The School Staffing (England) Regulations 2009

- The Children Act 1989 (and 2004 amendment)

- Multi-agency statutory guidance on female genital mutilation (July 2020) and Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015

- Statutory guidance on FGM

- The Rehabilitation of Offenders Act 1974

- Safeguarding Vulnerable Groups Act 2006

- Statutory guidance on the Prevent duty

- The Childcare (Disqualification) Regulations 2009 (and 2018 amendment)

- The Human Rights Act 1998

- The Equality Act 2010

- The Public Sector Equality Duty (PSED)

- Guidance from the Northamptonshire Safeguarding Children Partnership (NSCP) can be found here: http://www.northamptonshirescb.org.uk/

- Guidance for safer working practice for those working with children and young people in education settings (2022)

- What to do if you're worried a child is being abused (2015)

- Guidance for safer working practice for those working with children and young people in education settings (2022)

- Working together to improve school attendance (2022)

- Meeting digital and technology standards in schools and colleges (DfE)

3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment

- Preventing impairment of children's mental and physical health or development

- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Child on child abuse refers to the abuse of a child or children perpetrated by another child or children.

Children includes everyone under the age of 18.

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

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

NSCP: The three organisations in Northamptonshire who are jointly responsible for the partnership arrangements for keeping children safe are:

Northamptonshire County Council, Northamptonshire Police and Northamptonshire Integrated Care Boards (Nene CCG and Corby CCG) who all make up Northamptonshire Safeguarding Children Partnership.

4. Equality statement

Some children have an increased risk of abuse, both online and offline and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see Section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see Section 12)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the College and is consistent with the procedures of the Northamptonshire Safeguarding Children Partnership (NSCP). Our policy and procedures also apply to extended school and off-site activities.

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

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - Healthy and respectful relationships

- o Boundaries and consent
- o Stereotyping, prejudice and equality
- o Body confidence and self-esteem
- o How to recognise an abusive relationship (including coercive and controlling behaviour)
- o The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
- o What constitutes sexual harassment and sexual violence and why they are always unacceptable

5.1 All staff

All staff will read and understand Part 1 and Annex B of the Department for Education's statutory safeguarding guidance, *Keeping Children Safe in Education*, and review this guidance at least annually.

All staff:

- Will take part in safeguarding and child protection training as well as online safety (including IT filtering and monitoring procedures and how to report related safeguarding or technical concerns);
- Will reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they will be interacting with online);
- Will receive safeguarding updates throughout the year as part of continuous professional development;
- All teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012);
- Will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will be aware of:

- Our systems and documents that support safeguarding, including this policy, the Staff Code of Conduct, the role and identity of the Designated Safeguarding Lead (DSL) and any deputies, the behaviour policy and the safeguarding response to children missing from education and children who are absent from education, particularly on repeat occasions and/or for prolonged periods;
- The Early Help Process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment;
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play;
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation;
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe;
- Understand that children can be at risk of harm inside and outside of their home, at school and online;

- Understand that a child may be LGBT but this is not in itself an inherent risk factor for harm. However, we understand that children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT;

- Reinforce the importance of online safety when communicating with parents/carers. This includes making parents/carers aware of what the College asks children to do online (e.g. sites they need to visit or who they will be interacting with online);

- Provide a safe space for students who are from the LGBTQ+ community to speak out and share their concerns;

- All staff who have contact with children and families will have supervision, which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues;

- All staff will recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Section 15 and Appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the Senior Leadership Team. Our DSL is Jyoti Pankhania: Assistant Principal. The DSL takes lead responsibility for child protection and wider safeguarding in the College including Online Safety.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

The DSL can also be contacted out of school hours if necessary via the email: jpankhania@latimer.org.uk

When the DSL is absent, the assigned deputy will act as cover.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters;

- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so;

- Contribute to the assessment of children;

- Have a good understanding of harmful sexual behaviour and how to support children in the event that this issue arises;

- Have a good understanding of the filtering and monitoring systems and processes in place at our school;

- Know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support;

- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search;

- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly;

- Make referrals to the Channel programme where there is a radicalisation concern and/or support staff that make a referral to Channel;

- Support staff with regards to their responsibilities under the Prevent duty and provide advice and support on protecting children from radicalisation;

- Refer cases to the police where a crime may have been committed;

- The DSL will also keep the Principal informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate;

- The DSL will support children who have experienced or are experiencing safeguarding or child protection issues by using information they hold about children with a social worker to make decisions in the best interests of the child's safety, welfare and to help promote educational outcomes. This will include ensuring that staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children;

- Ensure that staff are aware of the College's unauthorised absence procedures and children missing education procedures.

The full responsibilities of the DSL and deputies are set out in their job descriptions.

The full responsibilities of the DSL are set out in Annex C, KCSIE (2023)

5.3 The Governing body

The governing body will:

- Ensure that they comply with their duties under statutory guidance and legislation including its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements;

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development;

- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Principal to account for its implementation;

- Appoint a safeguarding governor to monitor the effectiveness of this policy in conjunction with the full governing body. This is always a different person from the DSL;

- Ensure that the College has appropriate filters and monitoring systems are in place to keep children safe online and regularly review the effectiveness of the systems. Ensure that the Senior Leadership Team and relevant staff are:
  - Aware of and understand the systems in place
  - Manage them effectively
  - Know how to escalate concerns when identified

- Review the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the College in meeting these standards;

- Make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
  - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
  - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
  - The College has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
  - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

o That all staff undergo safeguarding and child protection training (including online safety which, amongst other things, will include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) on induction and regularly thereafter;

o Ensure that children are taught about safeguarding, including online safety

o Ensure that appropriate safeguarding arrangements are in place to respond to children missing from education and those who are absent from education, particularly on repeat occasions and/or for prolonged periods

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

o Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed

o Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate

o Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Principal.

All governors will read '*Keeping Children Safe in Education'* in its entirety and take part in regular safeguarding training including online safety.

Section 15 of this policy has information on how governors are supported to fulfil their role.

5.4 The Principal

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

- Ensuring that staff (including temporary staff) and volunteers:

  o Are informed of our systems which support safeguarding, including this policy, as part of their induction

  o Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

- Communicating this policy to parents/carers when their child joins the College and via the College website;

- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent;

- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly;

- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer;

- Appoint a 'Designated Teacher for Looked After Children and Previously Looked After Children' and a lead for online safety (DSL – KCSIE Paragraph 103);

- Ensure that all recruitment follows the safer recruitment guidance (see Part 3 of KCSIE) and a single, central record is maintained with details of all members of staff who are in contact with children;

- Respond to allegations of abuse against all other members of staff and act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate;

- Make decisions regarding all low-level concerns;

- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;

- Ensure that the College works with social care, the police, health services and other services to; promote the welfare of children; provide a co-ordinated offer of early help when need is identified; contribute to inter-agency plans for children subject to children protection plans and to protect children from harm;

- Safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012);

- Ensure that children's social care (from the host local authority or placing authority) have access to the College to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe in Education (September 2023).

6. Confidentiality

Our College recognises the importance of information sharing and follows statutory guidance as set out in "*Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers*" March 2018.

The College understand that:

- Timely information sharing is essential to effective safeguarding;

- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children;

- The *Data Protection Act (DPA) 2018* and *UK GDPR* do not prevent, or limit, the sharing of information for the purposes of keeping children safe;

- If staff need to share 'special category personal data', the *DPA 2018* contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk;

- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests;

- The government's *information sharing advice for safeguarding practitioners* includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information;

- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy);

- Confidentiality is also addressed in this policy with respect to record-keeping in Section 14;

- Where appropriate the College Safeguarding Team will discuss any concerns about a child with the child's parents/carers;

- If the College believe that notifying the parents/carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so. In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

7. Recognising and respond to abuse

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

Please note – in this and subsequent sections, any references to the DSL to mean "the DSL or deputy DSLs".

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

The adult must make a referral to children's social care and/or the police **immediately** if the adult believes a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

- Staff must inform the DSL (see Section 5.2) as soon as possible if they make a referral directly

- Multi-Agency Safeguarding Hub Contact Details: **0300 126 7000 (option 1)**

- In an emergency outside office hours, contact the Emergency Duty Team or the Police: **01604 626938**

- https://www.gov.uk/report-child-abuse-to-local-council

7.2 If a child makes a disclosure to a member of staff

If a child discloses a safeguarding issue, staff should:

- Listen to and believe them. Allow them time to talk freely and not ask leading questions.

- Stay calm and not show that they are shocked or upset.

- Tell the child they have done the right thing in telling the member of staff. Staff should not tell the child that they should have told them sooner.

- Explain what will happen next and that the information will need to be passed on. Staff should not promise to keep it a secret.

- Write up the conversation as soon as possible in the child's own words. The facts should be stuck to, without staff adding their own judgements.

- Make this referral on the College's 'My Concern' logging system as soon as possible and add any notes as attachments.

- Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that they have done so. Aside from these people, staff should not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

- All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

7.3 If a member of staff discovers that FGM has taken place or a student is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in Appendix 3 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or

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

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **student under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

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

7.4 If staff have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before Section 7.7, illustrates the procedure to follow if staff in the College have any concerns about a child's welfare.

The DSL will decide on the most appropriate course of action and whether the concerns should be referred to children's social care, using the Northamptonshire Thresholds Guidance. If it is decided to make a referral to children's social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Staff should speak to a member of the Senior Leadership Team and/or take advice from local authority children's social care. Staff can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Staff must share details of any actions they take with the DSL as soon as practically possible.

7.4.1 Early help

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the College will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

7.4.2 Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support the member of staff to do so.

If staff make a referral directly (see Section 7.1), they must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

7.5 If staff have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible staff should speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Staff should speak to a member of the Senior Leadership Team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which College staff and governors can call to raise concerns about extremism with respect to a student. Staff can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if staff:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

7.6 If staff have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
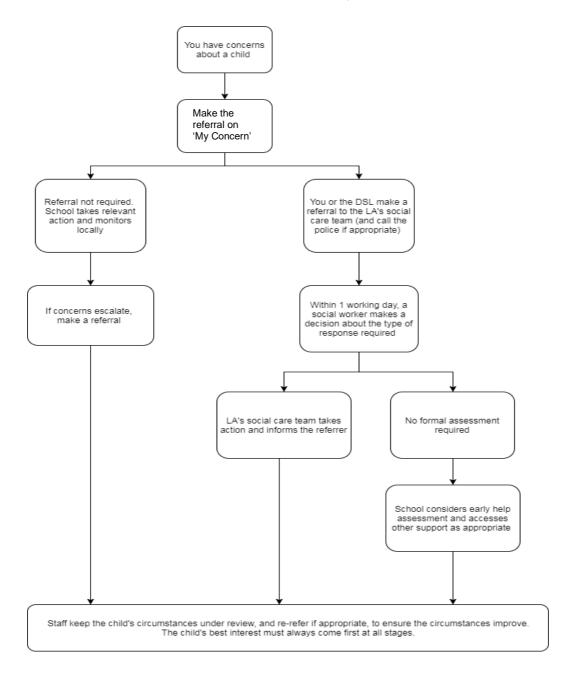
Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, 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, take immediate action by following the steps in Section 7.4.

If staff have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

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

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

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

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Principal as soon as possible. If the concerns/allegations are about the Principal, speak to the chair of governors.

The Principal/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

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

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

7.8 Allegations of abuse made against other students

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of students hurting other students will be dealt with under our College's Behaviour for Learning and Anti-Bullying Policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence;
- Could put students in the College at risk;
- Is violent;
- Involves students being forced to use drugs or alcohol;
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).

See Appendix 3 for more information about child-on-child abuse.

The College also has a student accessible Anti-bullying policy.

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

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

- Staff must record the allegation and tell the DSL, but do not investigate it;
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence;
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed;
- The DSL will contact the Children and Adolescent Mental Health Services (CAMHS), if appropriate.

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

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

To achieve this, the College will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images;

- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys;

- Ensure our curriculum helps to educate students about appropriate behaviour and consent;

- Ensure students are able to easily and confidently report abuse using our reporting systems (as described in Section 7.10 below);

- Ensure staff reassure victims that they are being taken seriously;

- Ensure staff are trained to understand:

  o How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports

  o That even if there are no reports of child-on-child abuse in the College, it does not mean it is not happening and staff should maintain an attitude of "it could happen here"

  o That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

    ▪ Children can show signs or act in ways they hope adults will notice and react to

    ▪ A friend may make a report

    ▪ A member of staff may overhear a conversation

    ▪ A child's behaviour might indicate that something is wrong

  o That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

  o That a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

  o The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it

  o That they should speak to the DSL if they have any concerns

7.9 Sharing of nudes and semi-nudes ('sexting'): Staff responsibilities when responding to an incident

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

Staff must **not**:

- View, copy, print, share, store or save the imagery themselves, or ask a student to share or download it (if they have already viewed the imagery by accident, this must be reported to the DSL);

- Delete the imagery or ask the student to delete it;

- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility);

- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers;

- Say or do anything to blame or shame any young people involved.

Staff should explain that they need to report the incident, and reassure the student(s) that they will receive support and help from the DSL.

7.9.1 Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate College staff – this may include the staff member who reported the incident and the safeguarding or senior leader who deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s);
- If a referral needs to be made to the police and/or children's social care;
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed);
- What further information is required to decide on the best response;
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown);
- Whether immediate action should be taken to delete or remove images or videos from devices or online services;
- Any relevant facts about the students involved which would influence risk assessment;
- If there is a need to contact another school, college, setting or individual;
- Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved).

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult;
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs);
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- The imagery involves sexual acts and any student in the images or videos is under 13;
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

7.9.2 Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the students involved (if appropriate).

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

7.9.3 Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

7.9.4 Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialing 101.

7.9.5 Recording incidents

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

7.9.6 Curriculum coverage

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Relationships and Sex Education curriculum and E-Safety Strategy during Personal Development Sessions, Assemblies and certain curriculum areas. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is;
- How it is most likely to be encountered;
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment;
- Issues of legality;
- The risk of damage to people's feelings and reputation.

Students also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images;
- The receipt of such images.

This policy on the sharing of nudes and semi-nudes is also shared with students so they are aware of the processes the College will follow in the event of an incident.

7.10 Reporting systems for our students

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

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

To achieve this, we will:

- Put systems in place for students to confidently report abuse, including a dedicated e-mail address;
- Ensure our reporting systems are well promoted, easily understood and easily accessible for students;
- Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback
  - o Students are taught that they can report abuse to any adult in the College.
  - o Students are regularly reminded who the Safeguarding Team are where they can report abuse or get support
  - o Students are made aware of the reporting systems and processes, through discussion in personal development sessions and assemblies
  - o Students are made to feel safe in submitting any concerns, reassurances are provided following disclosures, time is taken to ensure they feel comfortable and know all the steps that will be taken following the disclose

All staff will understand that a student may:

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

8. Online safety, including filtering and monitoring and mobile technology

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

To address this, our College aims to:

- Have robust processes in place to ensure the online safety of students, staff, volunteers and governors;

- Protect and educate the whole College community in its safe and responsible use of technology, including mobile and smart technology and social networking (which we refer to as 'mobile phones');

- Set clear guidelines for the use of mobile phones for the whole College community;

- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate;

- Creating a safer online environment – including training requirements, filters and monitoring;

- Giving everyone the skills, knowledge and understanding to help children and young people stay safe on-line;

- Ensure staff know what to report and how to report any concerns – including those related to the efficacy of filtering and monitoring systems;

- Encourage safe and responsible use and behaviour for all.

Any concerns related to children's safety online (either safeguarding or technical) should be reported to the DSL Team immediately.

8.1 The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

- Educate students about online safety as part of our curriculum. For example:
  - o The safe use of social media, the internet and technology
  - o Keeping personal information private
  - o How to recognise unacceptable behaviour online
  - o How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim

- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.

- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety.

- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

  o Staff are allowed to bring their personal phones to College for their own use, but will limit such use to non-contact time when students are not present

  o Staff will not take pictures or recordings of students on their personal phones or cameras

- Make all students, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in College, use of the College's IT systems and use of their mobile and smart technology.

- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones.

- Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the *DfE's guidance on searching, screening and confiscation*

- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the College's IT systems.

- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our College community.

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our College's policy on online safety and the use of mobile phones, please refer to our acceptable use policies.

9. Notifying parents or carers

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

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

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved.

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

We recognise that students with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;

- Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students;

- The potential for students with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs;

- Communication barriers and difficulties in managing or reporting these challenges.

We offer extra pastoral support for these students with the SEND intervention leads.

11. Students with a social worker

Students may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support (Individual support plan)

12. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Heidi Angel, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to;
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how student premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

13. Elective Home Education

- We understand that some parents choose to educate their children at home, are legally able to do so and this in itself is not a safeguarding issue. We encourage parents who are considering removing a student from roll for home education to meet with us prior to making a final decision to discuss this with us. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable.
- From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. As such, we will notify the LA when a child is removed from roll to be educated at home.

14. Complaints and concerns about College safeguarding policies

14.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff.

14.2 Whistle-blowing

The College has a separate Whistle-blowing Policy that covers concerns regarding the way the College safeguards students – including poor or unsafe practice, or potential failures.

15. Record-keeping

The College will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded on the electronic system 'My Concern'. If staff are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

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

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the College.

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

If a child for whom the College has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main student file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

16. Training

16.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the College's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning;
- Be in line with advice from the Northamptonshire Safeguarding Children Partnership (NSCP);
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring;
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  o Manage behaviour effectively to ensure a good and safe environment

o Have a clear understanding of the needs of all students.

All staff will have updates on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

16.2 The DSL and Safeguarding Team

The DSL and Safeguarding Team will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

The safeguarding team will have supervision, which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

They will also undertake Prevent awareness training.

16.3 Governors

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

16.4 Recruitment – interview panels

At least one person conducting any interview for any post at the College will have undertaken safer recruitment training. This will cover, as a minimum, the contents of *Keeping Children Safe in Education*, and will be in line with local safeguarding procedures.

See Appendix 2 of this policy for more information about our safer recruitment procedures.

17. Monitoring arrangements

This policy will be reviewed **annually** by the Senior Leader with responsibility for safeguarding. At every review, it will be approved by the full governing body.

18. Links with other policies

This policy links to the following policies and procedures:
- Behaviour for Learning Policy including our searching, screening and confiscation policy
- IT Acceptable Use Policy
- Anti-Bullying Policy
- Attendance Policy
- Relationships, Sex and Health Education Policy
- Staff and Students ICT Acceptable Use Policy
- Staff Code of Conduct
- Complaints Procedure
- Health and Safety Policy
- Equality and Diversity Policy
- Designated Teacher for Looked-after and Previously Looked-after Children Policy

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

Appendix 1: Types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person

- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction

- Seeing or hearing the ill-treatment of another

- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

- Protect a child from physical and emotional harm or danger

- Ensure adequate supervision (including the use of inadequate care-givers)

- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: Safer recruitment and DBS checks – policy and procedures

Recruitment and selection process

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

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

Advertising

When advertising roles, we will make clear:

- Our College's commitment to safeguarding and promoting the welfare of children

- That safeguarding checks will be undertaken

- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children

- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)

- Include a copy of, or link to, our Child Protection and Safeguarding Policy

Shortlisting

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

- Consider any inconsistencies and look for gaps in employment and reasons given for them

- Explore all potential concerns

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

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

- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

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

When seeking references, we will:

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

Interview and selection

When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

New staff

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

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

- o For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

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

- There are concerns about an existing member of staff's suitability to work with children; or

- An individual moves from a post that is not regulated activity to one that is; or

- There has been a break in service of 12 weeks or more

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

- We believe the individual has engaged in relevant conduct; or

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

- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

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

- An enhanced DBS check with barred list information for contractors engaging in regulated activity

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

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

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

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

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

Trainee/student teachers

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

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

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

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

All governors will also have a Section 128 check (as a Section 128 direction disqualifies an individual from being a maintained school governor).

Staff working in alternative provision settings

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

Adults who supervise students on work experience

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

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

Students staying with host families

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

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

Use of college premises for non-school activities

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll), the College will:

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

Appendix 3: Allegations of abuse made against staff

Appendix 3.1 Safeguarding concerns that may meet the harm threshold

In the event that there is an allegation of abuse against a member of staff, the College will adhere to Part 4, Section 1 of KCSIE (2023) and Northamptonshire Safeguarding Children Partnership guidance.

If staff have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, they must speak to the Principal as soon as possible. If the concerns/allegations are about the Principal, they must speak to the Chair of Governors.

This includes behaviour or incidents that have occurred both in college and outside of college.

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

Allegations against staff relating to a position of trust issue will be referred to the Local Authority designated officer within 24 hours. If a child has suffered or may have suffered abuse or harm, a MASH referral will also be made and the police will be contacted if necessary.

A referral to the Disclosure and Barring Service will be made if a member of staff is dismissed or removed from their post as a result of safeguarding concerns, or would have been removed if they had not resigned.

The College will ensure that any concerns or allegations against supply teachers are handled properly.

The College will not cease to use a supply teacher for safeguarding reasons without finding out the facts and liaising with the Local Authority Designated Officer to reach a suitable outcome.

The College will inform supply agencies of its process for managing allegations and will take account of the agency's policies and their duty to refer to the DBS as personnel suppliers

Appendix 3.2 Safeguarding concerns that do not meet the harm threshold (low level concerns)

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

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer (DO).

The College will act quickly, proportionately and appropriately in the event of a low level concern, to prevent abuse or harm of a child and to promote a culture of safeguarding. Dealing with low level concerns also protects those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

Staff will receive training about what may constitute a low-level concern. More information can be found in Part 4 of KCSIE (2023).

Low level concerns should be reported to the Principal.

The Principal will categorise the type of behaviour and decide on an appropriate course of action. This will be recorded, along with rationale for any decisions made and details of action taken.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. In the event that patterns and/or wider cultural issues within the college are identified, the college will either:

- take action through our disciplinary procedures;

- refer behaviour to the local authority designated officer/s where a pattern of behaviour moves from a concern to meeting the harms threshold; and/or

- revise policies or implement extra training as appropriate, to minimise the risk of behaviour happening again.

Appendix 4 Specific Safeguarding Issues

All staff will be made aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff will be expected to consider whether children are at risk of abuse or exploitation in situations outside their families (extra-familial harm).

Staff will also be made aware of the additional safeguarding vulnerabilities of;

- children in the court system;
- children missing from education;
- children with family members in prison;
- children who are homeless;
- child who have or have had a social worker;
- children who are young carers;
- children looked after or previously looked after; and
- children with mental health problems.

Relationships, sex and health education (RSHE)

The College plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing students for life in modern Britain, and a culture of not condoning sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour for Learning including Anti Bullying Policy
- Student Support System (our pastoral support)
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

  o Healthy and respectful relationships
  o Boundaries and consent
  o Stereotyping, prejudice and equality
  o Body confidence and self-esteem
  o How to recognise an abusive relationship (including coercive and controlling behaviour)
  o The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
  o What constitutes sexual harassment and sexual violence and why they are always unacceptable

Child-on-Child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of College and online.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)

- Abuse in intimate personal relationships between peers

- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

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

- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

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

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

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

Harmful sexual behaviour (HSB)

We recognise that children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. We refer to problematic, abusive and violent sexual behaviour as 'harmful sexual behaviour'.

When responding to HSB, we will:

- Consider the behaviours in a child protection context;
- Consider the ages and developmental stages of the children involved;
- Take action in line with local thresholds and pathways guidance and relevant statutory guidance; and
- Seek specialist support as required.

We will take action at the earliest possible point, to safeguard children and to prevent problematic, abusive and/or violent behaviour in the future.

We recognise that children displaying HSB have often experienced their own abuse and trauma and we will offer support as required.

Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect

- Are at risk of forced marriage or FGM

- Come from Gypsy, Roma, or Traveller families

- Come from the families of service personnel

- Go missing or run away from home or care

- Are supervised by the youth justice system

- Cease to attend a College
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the College without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

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

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the DSL before the child or children arrive at College the following day.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

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

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from College, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

Potential signs that a student may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from College
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

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

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

The DSL will:

- Speak to the student about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the student to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
    - Endangers or causes serious violence to a person/people;
    - Causes serious damage to property; or
    - Seriously interferes or disrupts an electronic system

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our students to stay safe online at College and at home.

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

Staff will be alert to changes in students' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a student is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution

- Changes in friendship groups and appearance

- Rejecting activities they used to enjoy

- Converting to a new religion

- Isolating themselves from family and friends

- Talking as if from a scripted speech

- An unwillingness or inability to discuss their views

- A sudden disrespectful attitude towards others

- Increased levels of anger

- Increased secretiveness, especially around internet use

- Expressions of sympathy for extremist ideologies and groups, or justification of their actions

- Accessing extremist material online, including on Facebook or Twitter

- Possessing extremist literature

- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow our procedures set out in Section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex

- Through a group of children sexually assaulting or sexually harassing a single child or group of children

- Online and face to face (both physically and verbally)

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

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

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

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

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

Serious violence

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

- Increased absence from College

- Change in friendships or relationships with older individuals or groups

- Significant decline in performance

- Signs of self-harm or a significant change in wellbeing

- Signs of assault or unexplained injuries

- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

- Being male

- Having been frequently absent or permanently excluded from College

- Having experienced child maltreatment

- Having been involved in offending, such as theft or robbery

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

Checking the identity and suitability of visitors

During the College day, all visitors have to be admitted to the College via the electronic gates. At this point, they will be required to verify their identity to the satisfaction of the Visitors' Receptionist, who monitors this access point.

If the visitor is unknown to the setting, the Visitors' Receptionist will check their credentials and reason for visiting before allowing them to enter the site. Visitors should be ready to produce identification.

On arrival at Visitors' Reception, visitors are expected to sign in electronically and wear a visitor's badge.

Visitors to the College who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID.

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