

Child Protection and Safeguarding Policy and Procedures



Ellesmere College

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Nominated Safeguarding Governor Mrs Karen Castle	Email: karen.castle@ellesmere.com Tel: 01691 622321

1 Policy statement

- 1.1 The College's Child Protection and Safeguarding Policy and Procedures (**Policy**) complies with the statutory guidance *Keeping Children Safe in Education September 2020* and *Working Together to Safeguard Children 2018, Disqualification under the Childcare Act 2006 (Updated 2018)* and *Prevent Duty Guidance for England and Wales 2015 (Updated 2019)* and:
- 1.1.1 has been authorised by the Governing Body of the College;
 - 1.1.2 is published on the College website and available in hard copy to parents on request;
 - 1.1.3 can be made available in large print or other accessible format if required; and
 - 1.1.4 its procedures apply wherever staff, Governors or volunteers are working with pupils even where this is away from the College, for example an educational visit.
- 1.2 Every pupil should feel safe and protected from any form of abuse. The College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. Safeguarding and promoting the welfare of children is everyone's responsibility. Staff are advised to maintain an attitude of '**it could happen here**' where safeguarding is concerned. Everyone who comes into contact with children should consider, at all times, what is in the best interest of the child. Children includes everyone under 18. The College will take all reasonable measures to:
- 1.2.1 ensure that we practise safer recruitment in checking the suitability of staff, Governors and volunteers (including staff employed by another organisation) to work with children and young people in accordance with: the guidance given in *Keeping Children Safe in Education*

September 2020; Disqualification under the Childcare Act 2006 (updated 2018); the Education (Independent School Standards) Regulations 2014 (as amended); and the National Minimum Standards for Boarding Schools 2015. See also the College's separate Safer Recruitment Policy;

- 1.2.2 ensure that where staff from another organisation are working with our pupils on another site, we require written confirmation that appropriate safer recruitment checks and procedures have been completed on those staff;
- 1.2.3 follow the local inter-agency procedures of the Shropshire Safeguarding Partnership in line with statutory guidance Working together to Safeguard Children 2018. Locally, the three safeguarding partners (the local authority; clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls) within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs;
- 1.2.4 be alert to signs of abuse both in the College and from outside and to protect each pupil from any form of abuse, whether from an adult or another pupil;
- 1.2.5 deal appropriately with every suspicion or complaint of abuse and to support children who have been abused in accordance with his / her agreed child protection plan;
- 1.2.6 design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;
- 1.2.7 be alert to the needs of children with physical and mental health conditions. All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation;
- 1.2.8 operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;
- 1.2.9 assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
- 1.2.10 identify children who may be vulnerable to radicalisation, and know what to do when they are identified;
- 1.2.11 teach pupils about safeguarding, for example through use of online resources, through the curriculum and PSHE, together with guidance on adjusting behaviour to reduce risks including the safe use of electronic devices and the internet, building resilience to protect themselves and their peers, and information about who they should turn to for help (see also the College's policies on the acceptable use of ICT and e-safety);
- 1.2.12 take all practicable steps to ensure that College premises are as secure as circumstances permit;
- 1.2.13 consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in the College or in the local area; and

1.2.14 have regard to regulations and standards issued by the Secretary of State for Education (DfE) in accordance with section 94 of the *Education and Skills Act 2008* and sections 29 and 38 of the *Counter-Terrorism and Security Act 2015* and associated regulations.

1.3 *Keeping Children Safe in Education September 2020* defines safeguarding and promoting the welfare of children as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. The *Prevent Duty Guidance for England and Wales* emphasises that the duty to have due regard to the need to prevent children from being drawn into terrorism is an aspect of safeguarding. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. Schools should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

1.3.1 Visiting speakers should be suitably vetted so as not to expose pupils to ideology that might fall within the scope of the Prevent duty.

1.4 The *Childcare (Disqualification) Regulations 2009* place additional requirements on the College if the post holder is to work in early years' provision, later years' provision (children who have not attained the age of 8) or are directly concerned in the management of such early or later years' provision.

These staff need to complete the College's Disqualification Declaration Form, see Appendix 5.

1.5 **Related policies**

1.5.1 This following policies and procedures are also relevant to the College's safeguarding practices:

- (a) Staff Code of Conduct
- (b) Whistleblowing Policy
- (c) Safer Recruitment Policy
- (d) Anti-bullying Policy
- (e) E-safety and Acceptable Use of ICT Policy
- (f) Missing Pupil Policy
- (g) Policy on the administration of medicines and supporting pupils with medical conditions
- (h) Pupil Behaviour Policy
- (i) Safeguarding response to children missing education – See section 4.5

1.5.2 These policies are available to staff on the College's intranet and hard copies are available on request.

2 The Designated Safeguarding Lead

- 2.1 The College's Governing Body has appointed a member of staff of the College's Senior Management Team (SMT) team with the necessary status and authority (Designated Safeguarding Lead) to be responsible for matters relating to child protection and welfare.
- 2.2 The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.
- 2.3 The Designated Safeguarding Lead shall be given the time, funding, training, resources and support to enable him/her to support other staff on safeguarding matters, to contribute to strategy discussions and/or inter-agency meetings and to contribute to the assessment of children.
- 2.4 Parents are welcome to approach the Designated Safeguarding Lead if they have any concerns about the welfare of any child in the College. If preferred, parents may discuss concerns in private with the child's form teacher or the Head who will notify the Designated Safeguarding Lead in accordance with these procedures.
- 2.5 The name and contact details of the Designated Safeguarding Lead are set out in the College Contacts list at the front of this Policy. The main responsibilities of the Designated Safeguarding Lead are set out in Appendix 1.
- 2.6 During term time, the designated safeguarding lead and or his/her deputy should always be available (during College hours) for staff in the College to discuss any safeguarding concerns.
- 2.7 If the Designated Safeguarding Lead is unavailable, his / her duties will be carried out by the Deputy Designated Safeguarding Lead. The Deputy Designated Safeguarding Lead's details are also set out in the College Contacts list and in Appendix 1. In this Policy, reference to the Designated Safeguarding Lead includes the Deputy Designated Safeguarding Lead where the Designated Safeguarding Lead is unavailable.
- 2.8 Whilst the activities of the designated safeguarding lead can be delegated to his/her appropriately trained deputy, the ultimate **lead responsibility** for safeguarding and child protection as set out in Appendix 1, remains with the designated safeguarding lead. This responsibility will not be delegated.
- 2.9 The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. NPCC- When to call the police should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

3 Duty of staff, Governors and volunteers

- 3.1 All staff, Governors and volunteers of the College are under a general legal duty:
 - 3.1.1 to protect children from abuse;
 - 3.1.2 to be aware of the terms and procedures in this Policy and to follow them;
 - 3.1.3 to know how to access and implement the procedures in this Policy, independently if necessary;

3.1.4 to keep a sufficient record of any significant complaint, conversation or event in accordance with this Policy; and

3.1.5 to report any matters of concern in accordance with this Policy.

3.2 All College staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years, through to the teenage years. In the first instance, staff should discuss early help requirements with the designated safeguarding lead. Staff may be required to support other agencies and professionals in an early help assessment.

3.2.1 Any child may benefit from early help. But all school and college staff should be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

3.3 The Governing Body ensures that the College's safeguarding arrangements take into account the procedures and practice of the Shropshire Safeguarding Partnership. The Governing Body has nominated one of its members to take leadership of the College's safeguarding arrangements on behalf of the Board and to liaise with external agencies where this is required, including in the event of allegations of abuse made against the Head or a member of the Governing Body. The Nominated Safeguarding Governor is Mrs Karen Castle.

3.4 The most common reason for children becoming looked after is as a result of abuse and/or neglect, as such:

3.4.1 A designated teacher will be appointed by the Governors to promote the educational achievement of children who are looked after. The Governors will ensure that staff have

the skills, knowledge and understanding necessary to keeping looked after children safe. In particular they will ensure that the information they need in relation to the child's looked after status, his / her care arrangements and the levels of authority delegated to the carer by the authority looking after him / her is made available to them.

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

3.5 The Governing body ensures that the College recognises that children with Special Educational Needs (SEN) and disabilities can face additional safeguarding challenges. These can include:

3.5.1 Assumptions that indicators of possible abuse such as behaviour, mood and injury are related to the child's disability without further exploration;

3.5.2 The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and

3.5.3 Communication barriers and difficulties in overcoming these barriers.

3.6 Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

3.6.1 Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. 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.

3.6.2 Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example considering the provision or pastoral and/or academic support, alongside action by statutory services).

3.7 Schools and colleges have an important role to play in supporting the mental health and wellbeing of their pupils.

3.7.1 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. Governing bodies and proprietors should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

3.8 The Governing body should ensure there are appropriate policies and procedures (see 1.5.1) in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.

3.9 Training

3.9.1 Induction

- (a) All staff, including temporary staff and volunteers, will be provided with induction training and a Staff Handbook that includes:
 - (i) this Policy;
 - (ii) information on Conduct at Work and Conduct Outside Working Hours, i.e. Staff Code of Conduct including the whistleblowing procedure;
 - (iii) the role, identity and contact details of the Designated Safeguarding Lead and his / her Deputy;
 - (iv) child protection training in accordance with Shropshire Safeguarding Partnership procedures;
 - (v) a copy of Part 1 of *Keeping Children Safe in Education September 2020* and *Ellesmere's associated e-learning test*; and
 - (vi) the online general awareness training module on Channel.

3.9.2 Child protection training

- (a) All staff including the Head will receive a copy of this policy and Part 1 of *Keeping Children Safe in Education September 2020*, and will be required to confirm that they have read these, as well as completing Ellesmere's associated e-learning test. SMT and those staff who work directly with children should read annex A.
- (b) The Head and all staff members will undertake appropriate safeguarding child protection training which will be updated every 3 years and following consultation with the Shropshire Safeguarding Partnership. Training will include guidance on the duties of staff in relation to both children in need and children at risk of harm. In addition, all staff members will receive safeguarding and child protection updates as required, but at least annually.
- (c) Staff development training will also include training on on-line safety (in line with the College's E-Safety and Acceptable use of ICT policy) and, where they have not been able to access other Prevent training assessed as appropriate for them by the College, the online general awareness training module on Channel.
- (d) Additionally, the College will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child sexual exploitation, female genital mutilation, cyberbullying and mental health.
- (e) The Governing Body should recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis.

Opportunity will therefore be provided for staff to contribute to and shape safeguarding arrangements and child protection policy.

- (f) The Nominated Safeguarding Governor will receive appropriate training to enable them to fulfil their safeguarding responsibilities.

3.9.3 Designated Safeguarding Lead

- (a) The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead have undertaken child protection training and training in inter-agency working, and will attend refresher training at two-yearly intervals. For further details about the training of the Designated Safeguarding Lead, see Appendix 1.
- (b) Prevent duty training will be consistent with Home Office WRAP (Workshop to Raise Awareness of Prevent) training if available.

3.9.4 All training will be carried out in accordance with Shropshire Safeguarding Partnership procedures.

4 Procedures

4.1 Complaints of abuse

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

4.1.2 The child protection training provided to staff considers the types and signs of abuse staff should be aware of. Further details are set out in Appendix 2, the NSPCC website² and the HM government publication: *What to do if you are concerned a child is being abused – Advice for practitioners*¹

4.1.3 If a member of staff has any concerns about a child's welfare or is concerned that a pupil may be suffering harm, the matter should be referred to the Designated Safeguarding Lead immediately. If a member of staff suspects or hears a complaint of abuse, the procedures set out in Appendix 3 must be followed immediately. See paragraph 4.3 and Appendix 4 for the procedures for dealing with allegations against staff and volunteers.

4.1.4 **If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care and/or the police immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration.**

4.1.5 All staff are particularly reminded:

- a. Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of

¹ <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

² <https://www.nspcc.org.uk>

FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. *Home Office FGM Factsheet attached.*¹

- b. Normal referral processes must be used when there are concerns about children who may be at risk of being drawn into terrorism.

4.2 Action by the Designated Safeguarding Lead

4.2.1 On being notified of a complaint or suspicion of abuse, the action to be taken by the Designated Safeguarding Lead will take into account:

- (a) the local inter-agency procedures of the Shropshire Safeguarding Partnership;
- (b) where relevant, local information sharing protocols relating to Channel referrals;
- (c) the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence, including the identification of someone who may already be engaged in illegal terrorist-related activity, will always be referred to children's social care and, if appropriate, the police;
- (d) the child's wishes or feelings; and
- (e) duties of confidentiality, so far as applicable.

4.2.2 If there is room for doubt as to whether a referral should be made, the Designated Safeguarding Lead will consult with children's social care on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral to children's social care will be made without delay (and in any event within 24 hours).

4.2.3 If the initial referral is made by telephone, the Designated Safeguarding Lead will confirm the referral in writing to children's social care within 24 hours. If no response or acknowledgment is received within three working days, the Designated Safeguarding Lead will contact children's social care again.

4.2.4 In circumstances where a pupil has not suffered and is not likely to suffer significant harm but is in need of additional support from one or more agencies, the Designated Safeguarding Lead will liaise with children's social care and where appropriate an inter-agency assessment will take place, including use of the Common Assessment Framework and Team around the Child approaches, as necessary.

4.2.5 Where relevant, the College will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The College will respond to requests for information from the police promptly and in any event within five to ten working days. This will all need to be in line with the College's Data Protection Policy.

¹ <https://www.gov.uk/government/publications/female-genital-mutilation-leaflet>

4.3 Dealing with allegations against staff, Governors and volunteers

- 4.3.1 The College has procedures for dealing with allegations against staff, Governors and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures are set out in Appendix 4 and follow Part 4 of *Keeping Children Safe in Education September 2020*.
- 4.3.2 The local authority has designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children (designated officer(s) or LADO). The LADO will be informed immediately and in any event within one working day of all allegations against staff, Governors and volunteers that come to the College's attention and appear to meet the criteria set out in paragraph 1 of Appendix 4.
- 4.3.3 Detailed guidance is given to staff and volunteers to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in the Staff Handbook and includes detail of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.
- 4.3.4 Staff and volunteers should also feel able to follow the College's separate Whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices at the College, potential failures by the College or its staff to properly safeguard the welfare of pupils or other wrongdoing in the workplace that does not involve the safeguarding and welfare of children.
- 4.3.5 Where staff feel unable to raise an issue with their employer or feel that their genuine concerns are not being addressed other whistle blowing channels are open to them: The NSPCC whistleblowing helpline 0800 0280285 8am-8pm, Monday-Friday, email help@nspcc.org.uk or the National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London, EC2A 3NH.

4.4 Allegations against pupils

- 4.4.1 Staff should recognise that children are capable of abusing their peers (See Anti-Bullying Policy).
- 4.4.2 Allegations against pupils should be reported in accordance with the procedures set out in this Policy. A bullying incident will be treated as a child protection concern if there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. A pupil against whom an allegation of abuse has been made may be suspended from the College during the investigation and the College's policy on behaviour, discipline and sanctions will apply.
- 4.4.3 The College will take advice from children's social care on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.
- 4.4.4 If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the College will ensure that, subject to the advice of children's social care, the

pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's Education Guardian will be requested to provide support to the pupil and to accommodate him / her if it is necessary to suspend him / her during the investigation.

4.4.5 Where an allegation is made against a pupil, both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this Policy will be followed.

4.5 **Missing child and children missing from education procedures**

with reference to 'Children missing in education Statutory guidance for local authorities' September 2016.

4.5.1 **Missing Child**

- (a) All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting, any pupil missing from school. The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing.
- (b) Please see the College's separate Missing Pupil Policy for further details.

4.5.2 **Children Missing from Education**

- (a) The College ensures that, where a pupil is removed from the Admission Register, the next school they are to attend is recorded. Where the next school is not disclosed by the parent or carer, the College notifies the local authority in which the pupil is resident. Shropshire LA should be contacted for advice and guidance if necessary (01743 254397)
- (b) The College shall inform the applicable local authority (within which the pupil resides when not at the College) of any pupil (this is up to and including Year 11 pupils, but not Year 11 leavers at the end of the academic year) who is going to be deleted from the admission register where he /she:
 - (i) has been taken out of school by his /her parents and are being educated outside the school system e.g. home education;
 - (ii) has been certified by the College medical officer as unlikely to be in a fit state of health to attend the College before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the College after ceasing to be of compulsory school age;
 - (iii) is in custody for a period of more than four months due to a final court order and the College does not reasonably believe he/she will be returning at the end of that period;
 - (iv) has been permanently excluded;
 - (v) has been withdrawn from the College and we are unable to confirm the name of his / her new school.

- (c) The applicable local authority must be notified as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. This will assist the local authority to:
 - (i) fulfil its duty to identify children of compulsory school age who are missing from education; and
 - (ii) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

4.5.3 The College shall inform the applicable local authority of any pupil who fails to attend the College regularly, or has been absent without the College's permission for a continuous period of 10 school days or more.

4.6 Informing parents

4.6.1 Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Designated Safeguarding Lead will need to consult the Head, the LADO, children's social care and / or the police before discussing details with parents.

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

4.6.3 See also Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff, volunteer or the Head of the College.

5 Secure school premises

5.1 The College will take all practicable steps to ensure that College premises are as secure as circumstances permit.

5.2 The College keeps a visitor's book at Reception. All visitors must sign in on arrival and sign out on departure and are kept under appropriate supervision whilst on College premises by a member of staff or appropriately vetted volunteer. All visitors will be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the College premises.

5.3 All visitors to the boarding houses must report to the duty member of staff immediately on arrival, and must observe the necessity to be kept under sufficient staff supervision during their visit.

5.4 Parents who are picking up and delivering their child and belongings, do not constitute being a visitor and may enter the boarding House for these purposes.

6 Confidentiality and information sharing

6.1 The College will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The College will co-operate and work with police and children's social care and other services to ensure that all relevant information is shared to promote the welfare of children and protect them from harm,

and for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of *Working Together to Safeguard Children 2015 (updated 2017)*, the *Prevent Duty Guidance for England and Wales 2015* and *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism 2015*.

6.1.1 Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

6.1.2 Further details on information sharing can be found in Chapter one of *Working Together to Safeguard Children 2015 (updated 2017)* and at *Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers*.

6.2 Where allegations have been made against staff, the College will consult with the LADO and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

6.3 It is important that governing bodies and proprietors are aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

6.4 Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.

6.5 The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children

7 Monitoring and review

7.1 The Designated Safeguarding Lead will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with the Governors as necessary. The Designated Safeguarding Lead will update the other members of the Senior Management Team regularly on the operation of the College's safeguarding arrangements.

7.2 Any child protection incidents at the College will be followed by a review of these procedures by the Designated Safeguarding Lead and a report made to the Governing Body. Where an incident involves a member of staff, the LADO will be asked to assist in this review to determine whether any improvements can be made to the College's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.

7.3 The full Governing Body will undertake an annual review of this Policy and the College's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. The Designated Safeguarding Lead will work with the Nominated Safeguarding Governor, preparing a written report commissioned by the full Governing Body. The written report should address how the College ensures that this Policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the College and how these have been handled; and

the contribution the College is making to multi-agency working in individual cases or local discussions on safeguarding matters.

- 7.4 The full Governing Body should also consider independent corroboration, such as inspection of records or feedback from external agencies including the local authority designated officer. The full Governing Body will review the report, this Policy and the implementation of its procedures and consider the proposed amendments to the Policy before giving the revised Policy its final approval. Detailed minutes recording the review by the Governing Body will be made.

8 **Contacts**

- 8.1 The details of the LADO are as follows:

Name: Ellie Jones

Address: Shropshire Assessment & Support Services, Shropshire County Council, Shrewsbury Business Park, Shrewsbury, Shropshire. SY2 6FG

Telephone number: 03456 789021

- 8.2 The telephone numbers of the Shropshire children's social care department are as follows:

Concerns about the Welfare of a Child 0345 678 9021

Out of Hours Emergency Duty Team 0345 678 9040

- 8.3 The local police non-emergency contact number is 101.

- 8.4 The telephone numbers of relevant Prevent partners are as follows

● DS Stuart Clark 01386 591835

● DC Sarah Skeding 01386 591825

National DfE helpline 0370 0002288

Counter Extremism 0207 340 7264

Anti-Terrorist Hotline 0800 789 321

- 8.5 The email addresses of relevant Prevent partners are as follows

● counter-extremism@education.gsi.gov.uk

● prevent@warwickshireandwestmercia.pnn.police.uk

- 8.6 The following telephone numbers may be useful for pupils:

Shropshire Council's Children's Service 03456 789021

Childline 0800 1111

NSPCC 0808 800 5000

Children's Commissioner 0800 528 0731

Independent Listener	Chris Gwilliams	07825 665121
College counsellor	Chris Gwilliams	07825 665121

Authorised by	The Governors
Date	September 2020

Reviewed by	DHP
Date	September 2020

Effective date of the policy	September 2020
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Appendix 1 The Designated Safeguarding Lead

- 1 The Designated Safeguarding Lead for the College site is Dr R Chatterjee, Deputy Head Pastoral, who may be contacted on 01691 626508.
- 2 The Deputy Designated Safeguarding Lead is Mrs S V Pritt-Roberts, Deputy Head Academic, who may be contacted on 01691 626526
- 3 In accordance with Annex B of *Keeping Children Safe in Education September 2020*, the main responsibilities of the Designated Safeguarding Lead are:

3.1 Managing referrals

- To take lead responsibility for referring all cases of suspected abuse of any pupil at the College to children's social care and:
 - (i) the Local Authority Designated Officer (LADO) all child protection concerns which involve a member of staff or volunteer;
 - (ii) the Disclosure and Barring Service (DBS) where a member of staff is dismissed or has left due to risk / harm to a child; and / or
 - (iii) the police where a crime may have been committed.
- Liaising with the Head to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- To act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

3.2 Raising awareness

- Ensure this Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this.
- Ensure this Policy is available publicly.
- Ensure that parents are aware that referrals about suspected abuse or neglect may be made to children's social care and the College's role in this.
- Maintain links with the Shropshire Safeguarding Partnership to ensure staff are aware of training opportunities and the local policies on safeguarding.
- Where children leave the College ensure their child protection file is copied for any new school or college as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt will be obtained.
- In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example,

information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

- In accordance with the *Prevent Duty Guidance for England and Wales* and *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism 2015* the Designated Safeguarding Lead has, in addition, the following responsibilities:
 - (i) Acting as the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty;
 - (ii) Co-ordinating Prevent duty procedures in the College;
 - (iii) Liaising with local Prevent co-ordinators, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and/or the police where indicated;
 - (iv) Undergoing WRAP or other appropriate training;
 - (v) Maintaining ongoing training programme for all school employees including induction training for all new employees and keeping records of staff training; and
 - (vi) Monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty.

4 The Deputy Designated Safeguarding Lead will carry out this role where the Designated Safeguarding Lead is unavailable.

5 The Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead have undertaken child protection training and training in inter-agency working, and will attend refresher training at two-yearly intervals and will receive Safeguarding and Child Protection updates as requested, but at least annually, in order to:

5.1 Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;

5.1.1 If early help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up 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 professional.

5.1.2 If early help and or other support is appropriate the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation doesn't appear to be improving.

- 5.2 Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- 5.3 Ensure each member of staff has access to and understands the College's child protection policy and procedures, especially new and part time staff;
- 5.4 Be alert to the specific needs of children in need, those with special educational needs and young carers;
- 5.5 Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- 5.6 Be able to keep detailed, accurate, secure written records of concerns and referrals;
- 5.7 Understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners;
- 5.8 Understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- 5.9 Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- 5.10 Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- 5.11 Obtain access to resources and attend any relevant or refresher training courses;
- 5.12 Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them and to meet the requirements and procedures of the Shropshire Safeguarding Partnership.

Appendix 2 Types and signs of abuse

1 Types of abuse

- 1.1 Staff should be aware that abuse, neglect and safeguarding issues are rarely stand alone events. In most cases multiple issues will overlap with one another.
- 1.2 **Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. Part one of *Keeping Children Safe in Education September 2020* defines the following types of abuse.
- 1.3 **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- 1.4 **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 1.5 **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. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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.
- 1.6 **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate

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

- 1.7 Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.
- 1.8 All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. (Abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up"). This is most likely to include, but may not be limited to:
- bullying (including cyberbullying);
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - sexual violence and sexual harassment
 - upskirting
 - sexting (also known as youth produced sexual imagery); and
 - Initiation/hazing type violence and rituals.
- 1.9 As a Boarding School, staff have additional factors to consider with regard to safeguarding. Schools that provide such residential accommodation should be alert to inappropriate pupil or student relationships and the potential for peer on peer abuse, particularly in schools with a significant gender imbalance.
- 1.10 All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.
- 1.11 Safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between children outside of this environment. All staff, but especially the designated safeguarding lead (and deputies) should be consider the context whether such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

2 Signs of abuse

- 2.1 Possible signs of abuse include, but are not limited to:

- a) The pupil says he / she has been abused or asks a question or makes a comment which gives rise to that inference
- b) There is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries
- c) The pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour
- d) The pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
- e) The pupil's development is delayed; the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing
- f) The pupil appears neglected, e.g. dirty, hungry, inadequately clothed
- g) The pupil is reluctant to go home, or has been openly rejected by his / her parents or carers and
- h) Inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one to one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

2.2 The Shropshire Safeguarding Partnership can provide advice on the signs of abuse and the DfE advice *What to do if you're worried a child is being abused 2015* provides advice in identifying child abuse. The NSPCC website www.nspcc.org.uk) is also a good source of information and advice.

3 **Keeping Children Safe in Education September 2020 acknowledges the following as specific safeguarding issues:**

- **Children and the court system**
- **Children missing from education¹**
- **Children with family members in prison²**
- **Child Criminal Exploitation (CCE)** is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceived a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

¹ <https://www.gov.uk/government/publications/children-missing-education>

² <https://www.nicco.org.uk/>

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- i) children who appear with unexplained gifts or new possessions;
 - ii) children who associate with other young people involved in exploitation;
 - iii) children who suffer from changes in emotional well-being;
 - iv) children who misuse drugs and alcohol;
 - v) children who go missing for periods of time or regularly come home late; and
 - vi) children who regularly miss school or education or do not take part in education.
- **Child Sexual Exploitation (CSE)** occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

CCE indicators can also be indicators of CSE, as can:

- (i) children who have older boyfriends or girlfriends; and
 - (ii) children who suffer from sexually transmitted infections or become pregnant.
- **County Lines** – See CCE
 - **Domestic abuse/violence**¹
 - **Homelessness**
 - **So-called “honour-based” violence (HBV)** encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and

¹ <https://www.nationaldahelpline.org.uk/>

practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Actions:

If staff have a concern regarding a child that might be at risk of HBV, they should contact the College designated safeguarding lead who will activate local safeguarding procedures.

- **Female genital mutilation (FGM)** professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines 2014 (<https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>). Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.¹

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

¹ <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

- **Peer on peer abuse**, which includes Sexual violence and sexual harassment between children
 - (i) Context: Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
 - (ii) 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. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.
 - (iii) Staff should be aware of the importance of:
 - a. making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
 - b. not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
 - c. challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- **Sexual violence:** It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:
 - i. Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
 - ii. Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B

does not consent to the penetration and A does not reasonably believe that B consents.

- iii. Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
- iv. What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- **Sexual harassment:** When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- i. sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- ii. sexual "jokes" or taunting;
- iii. physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- iv. online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
- v. non-consensual sharing of sexual images and videos;
- vi. sexualised online bullying;
- vii. unwanted sexual comments and messages, including, on social media; and
- viii. sexual exploitation; coercion and threats
- ix. upskirting

The response to a report of sexual violence or sexual harassment: The initial response to a report from a child is important. It is essential that all victims

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.

- **Preventing radicalisation** (see section 4 below)
- **Drugs¹**
- **Fabricated or induced illness**
- **Faith abuse²**

4 **Radicalisation and the Prevent duty**

4.1 The College has a legal duty to have due regard to the need to prevent people from being drawn into terrorism (Under section 26 of the Counter Terrorism and Security, Act 2015).

4.2 The College aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. The College is committed to providing a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

4.3 The College has adopted the KCSE September 2020 definitions for the purposes of compliance with the Prevent duty:

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

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

4.4 There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. College staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

4.5 *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism 2015* notes the following:

¹ <https://www.gov.uk/government/publications/drugs-advice-for-schools>

² <https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

“36. There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti social behaviour, family tensions, race/hate crime, lack of self esteem or identity and personal or political grievances.”

“51. Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- a) Spending increasing time in the company of other suspected extremists;
- b) Changing their style of dress or personal appearance to accord with the group;
- c) Day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- d) Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- e) Possession of material or symbols associated with an extremist cause (e.g. the swastika for far-right groups);
- f) Attempts to recruit others to the group/cause/ideology; or
- g) Communications with others that suggest identification with a group/cause/ideology.”

“52. Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:

- a) clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- b) using insulting or derogatory names or labels for another group;
- c) speaking about the imminence of harm from the other group and the importance of action now;
- d) expressing attitudes that justify offending on behalf of the group, cause or ideology;
- e) condoning or supporting violence or harm towards others; or
- f) plotting or conspiring with others.”

- 4.6 Protecting children from the risk of radicalisation is part of the College's wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

- 4.7 The DfE's briefing note '*The use of social media for on-line radicalisation 2015*' includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

Appendix 3 Guidance for staff and volunteers on suspecting or hearing a complaint of abuse

1 Action staff must take

- 1.1 A member of staff or volunteer suspecting or hearing a complaint of abuse:
- must listen carefully to the child and keep an open mind. The member of staff should not take a decision as to whether or not the abuse has taken place;
 - must not ask leading questions, i.e. a question which suggests its own answer;
 - must reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass on the information in accordance with this Policy so that the correct action can be taken; and
 - must keep a sufficient written record of the conversation. The record should include:
 - (i) the date and time;
 - (ii) the place of the conversation; and
 - (iii) the essence of what was said and done by whom and in whose presence;
 - and must be signed by the person making it, using names and not initials.
- 1.2 The written record and all other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely and passed on when reporting the matter in accordance with paragraph 1.3 below.
- 1.3 All suspicions or complaints of abuse must be reported to the Designated Safeguarding Lead immediately unless it is an allegation against a member of staff in which case the procedures set out in Appendix 4 should be followed.
- 1.4 **If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration.**

2 What will the local authority do?

The local authority should make a decision, within one working day of a referral being made, about the type of response that is required and should let the referrer know the outcome. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- whether the child is in need, and should be assessed under section 17;

- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47;
- any services are required by the child and family and what type of services; and
- further specialist assessments are required in order to help the local authority to decide what further action to take.

Appendix 4 Dealing with allegations against members of staff, the Head, Governors or volunteers

1 The College's procedures

1.1 The College's procedures for dealing with allegations made against staff will be used where the member of staff, the Head, Governor or volunteer has:

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

1.2 Any allegations not meeting these criteria will be dealt with in accordance with the Shropshire Safeguarding Partnership procedures. Advice from the LADO will be sought in borderline cases.

1.3 All such allegations must be dealt with as a priority without delay.

1.4 Historical Abuse

- Any historical abuse allegations should be referred to the Headmaster.
- Allegations against a teacher who is no longer teaching and historical allegations will be referred to the police by the Headmaster.

2 Reporting an allegation against a member of staff, the Head, Governor or volunteer

2.1 Where staff have a safeguarding concern, or an allegation that poses a risk of harm to children is made against any member of staff (including supply staff and volunteers) other than the Head. The matter should be reported immediately to the Head, or in his absence to the Nominated Safeguarding Governor. The allegation will be discussed immediately with the LADO before further action is taken. Where appropriate, the Head / Nominated Safeguarding Governor will consult with the Designated Safeguarding Lead.

2.1.1 Where an allegation is made against an individual not directly employed by the College, where our disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business, this will have to be considered.

2.1.2 Whilst the College is not the employer of supply teachers, we should ensure allegations are dealt with properly. In no circumstances should the College decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The College should discuss with the agency whether it is appropriate to suspend the supply teacher, or

redeploy them to another part of the school, while they carry out their investigation.

2.1.3 Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The College will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the College, are under our supervision, direction and control whilst working in the college. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the College during the investigation.

2.1.4 When using an agency, the College should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

2.2 Where an allegation or complaint is made against the Head, the matter should be reported immediately to the Chair of Governors or the Nominated Safeguarding Governor, without first notifying the Head. The allegation will be discussed immediately with the LADO before further action is taken. The Chair of Governors will consult the Nominated Safeguarding Governor, and vice versa.

2.3 Where an allegation is made against any Governor, the matter should be reported immediately to the Chair of Governors or the Nominated Safeguarding Governor. If either the Chair of Governors or the Nominated Safeguarding Governor are the subject of an allegation, the matter should be reported to the other. The allegation will be discussed immediately with the LADO before further action is taken. Where appropriate, the Chair of Governors will consult the Nominated Safeguarding Governor, and vice versa.

2.4 If it is not possible to report to the Head or Chair of Governors or Nominated Safeguarding Governor in the circumstances set out above, a report should be made immediately to the Designated Safeguarding Lead or, if he is unavailable, the Deputy Designated Safeguarding Lead. The Designated Safeguarding Lead will take action in accordance with these procedures and will as soon as possible inform the Head or, where appropriate, the Chair of Governors and the Nominated Safeguarding Governor.

2.5 The person taking action in accordance with the procedures in this Appendix is known as the "case manager".

3 Disclosure of information

3.1 The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted.

- 3.2 The Parents or carers of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. They will also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.
- 3.3 Where the LADO advises that a strategy discussion is needed, or the police or children's social care need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.
- 3.4 The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

4 Further action to be taken by the College

- 4.1 A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The College will take action in accordance with Part four of *Keeping Children Safe in Education September 2020* and the College's employment procedures.
- 4.2 Where an internal resident member of boarding staff is suspended pending an investigation of a child protection nature, arrangements for alternative accommodation away from children will be made for the member of staff.

5 Ceasing to use staff

- 5.1 If the College ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement/compromise agreement will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met. Any such incidents will be followed by a review of the safeguarding procedures within the College, with a report being presented to the Governors without delay.
- 5.2 If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the College in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible if the criteria are met.
- 5.3 Where a teacher has been dismissed, or would have been dismissed had he / she not resigned, separate consideration will be given as to whether a referral to the National College for Teaching and Leadership should be made.

6 Unsubstantiated, false or malicious allegations

- 6.1 Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the College's behaviour and discipline policy.
- 6.2 Where a parent has made a deliberately invented or malicious allegation the Head will consider whether to require that parent to withdraw their child or children from

the College on the basis that they have treated the College or a member of staff unreasonably.

- 6.3 Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the College reserves the right to contact the police to determine whether any action might be appropriate.

7 **Record keeping**

- 7.1 Details of allegations found to be malicious will be removed from personnel records.
- 7.2 For all other allegations, full details will be recorded on the confidential personnel file of the person accused. The record will be retained at least until the individual has reached normal pension age or for a period of ten years from the date of the allegation, if this is longer.
- 7.3 An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references. In accordance with *Keeping Children Safe in Education September 2020*, a history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

NOTES:



Appendix 5 Disqualification Declaration Form

This form is to be completed by: staff before working in later years provision for children (under 8) including before or after school provision¹ (not clubs); staff who are directly concerned in the management of such later years provision². To be completed by these staff on an annual basis.

Name: _____

Post: _____

Important – Please read in full before completing the declaration

Please answer the questions below to the best of your knowledge and sign the declaration at the end of this form.

Please answer each question below by circling YES or NO.

Questions relating to you:		
Have you been cautioned or convicted of any offences against a child?	YES	NO
Have you been cautioned or convicted of any violent or sexual offences against an adult?	YES	NO
Have you been barred from working with children by the Disclosure and Barring Service?	YES	NO
Have your children been taken into care?	YES	NO
Have or are your children the subject of a child protection order?	YES	NO
Has a court order been made in respect of a child under your care?	YES	NO
Have you been refused registration or had registration cancelled in relation to childcare or a children’s home or have you been disqualified from private fostering?	YES	NO

If you have answered YES to any of the questions above, please provide further information over the page:

¹ To be completed by KS2 teachers, Breakfast Supervisor, After School Supervisor, nursing staff, Chaplain and any other relevant staff.

² To be completed by SMT and HoLs.



I have answered YES to one or more of the questions above because...

Four horizontal lines for providing reasons.

With reference to *Keeping children safe in education* September 2020 (Statutory guidance for schools and colleges) and *Disqualification under the Childcare Act 2006* (updated 2018) (Statutory guidance for local authorities, maintained schools, academies and free schools):

- 1. I understand my responsibility to safeguard children and am aware that I must notify the Headmaster of anything that may affect my suitability or that of anyone living in my household.
2. I will ensure I notify the Headmaster immediately if the answers I have provided to the questions above change at any time.
3. I give permission for you to contact any previous settings, local authority staff, the police, the DBS, or any medical professionals, to share information about my suitability to care for children.

Signed _____

Date _____

To be completed by the Head:

I have reviewed the answers provided above and no further action is required.

Headmaster: Mr B J Wignall

Date: _____

Headmaster's signature:

Or

I have reviewed the answers provided above and the following action has been taken

Five horizontal lines for describing the action taken.

Headmaster: Mr B J Wignall

Date: _____

Headmaster's signature:
