

# UNITED LEARNING SAFEGUARDING CHILDREN AND CHILD PROTECTION POLICIES AND PROCEDURES



Date of last central office review:	September 2019	Review Period:	1 year (minimum)
Date of next central office review:	September 2020	Owner:	Midhurst Rother College
Date of next College level review:	September 2020		
Type of policy:	United Learning Policy	Local Governing Body	Recommends College policy for Group Board approval
		Group Board:	Group Board approves United Learning Policy

## REVIEW TIMETABLE

The Policy will be reviewed annually, as set out below:	
Policy reviewed centrally	July 2019
Policy tailored by individual Colleges	September 2019
Policy ratified by Local Governing Bodies	September 2019
Policy approved by the Group Board	July 2019
Implementation of Group Policy	September 2019

# Midhurst Rother College

2019 - 2020

## CHILD PROTECTION AND SAFEGUARDING POLICY

### KEY EXTERNAL CONTACT DETAILS

<b>Local Authority Designated Officer</b>	EMAIL: <a href="mailto:LADO@westsussex.gov.uk">LADO@westsussex.gov.uk</a> <ol style="list-style-type: none"><li>1. <b>Enquiry/uncertain if the matter is a LADO matter</b> please call the MASH number <b>01403 229 900</b></li><li>2. <b>Consultation or seeking advice</b> – please call the duty number <b>0330 222 6450 (9am – 5pm)</b></li><li>3. <b>Case Referral</b> – the referral form can be downloaded from the Partnerships website here. <a href="#">Allegations against someone who works with children   West Sussex Safeguarding Children Partnership</a> or alternatively you can contact the MASH and they will send you a referral via email.</li></ol>
<b>Multi-Agency Safeguarding Hub</b>	TEL 01403 229 900 EMAIL: <a href="mailto:MASH@westsussex.gov.uk">MASH@westsussex.gov.uk</a> Out of hours: 0330 222 6664
<b>Support and Advice about Extremism</b>	<b>Police</b> PC David Philips EMERGENCY: 999 NON EMERGENCY NUMBER: 101  <b>Local Authority</b> Tony Cook NON EMERGENCY NUMBER: 101 PREVENT LEAD: Paul Thompson  <b>Department for Education</b> NON EMERGENCY NUMBER: 020 7340 7264 EMAIL: <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a>
<b>NSPCC whistleblowing advice line</b>	ADDRESS: Weston House, 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>Disclosure and Barring Service</b>	ADDRESS: PO Box 181, Darlington, DL1 9FA TEL: 01325 953795 EMAIL: <a href="mailto:dbsdispatch@dbs.gsi.gov.uk">dbsdispatch@dbs.gsi.gov.uk</a>
<b>Teaching Regulation Agency</b>	ADDRESS: 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH TEL: 0207 593 5393 EMAIL: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>
<b>OFSTED Safeguarding Children</b>	TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm) EMAIL: <a href="mailto:Whistleblowing@ofsted.gov.uk">Whistleblowing@ofsted.gov.uk</a>

## KEY COLLEGE CONTACT DETAILS

<p><b>United Learning</b></p>	<p>Chair of United Learning Richard Greenhalgh EMAIL: <a href="mailto:enquiries@unitedlearning.org.uk">enquiries@unitedlearning.org.uk</a></p> <p><b>Principal of Safeguarding</b> Darran Ellison-Lee, Director of Primary Education EMAIL: <a href="mailto:Darran.Ellison-Lee@unitedlearning.org.uk">Darran.Ellison-Lee@unitedlearning.org.uk</a></p>
<p><b>Local Governing Body (LGB)</b></p>	<p><b>Chair of LGB</b> <a href="mailto:Mr.David.Lawes@mrc-academy.org">Mr David Lawes</a> TEL: 01730 812451 EMAIL: <a href="mailto:Kay.Grimstead@mrc-academy.org">Kay.Grimstead@mrc-academy.org</a> Clerk to the Local Governing Body</p> <p><b>Nominated Safeguarding Governor of LGB</b> Revd Dave Willis TEL: TEL: 01730 812451</p>
<p><b>Designated Safeguarding Lead (DSL) and Deputy Designed Safeguarding Lead (DDSLs)</b></p>	<p><b>Main DSL for the College</b> Mr Kevan John TEL: TEL: 01730 812451 EMAIL: <a href="mailto:Kevan.John@mrc-academy.org">Kevan.John@mrc-academy.org</a></p> <p><b>Deputy DSL</b> Mrs Claire Dickens EMAIL: <a href="mailto:Claire.Dickens@mrc-academy.org">Claire.Dickens@mrc-academy.org</a> Mrs Kath Chard EMAIL: <a href="mailto:Katherine.Chard@mrc-academy.org">Katherine.Chard@mrc-academy.org</a> TEL: 01730 812451</p> <p><b>Designated E-Safety Lead</b> Mr Paul Thompson TEL: TEL: 01730 812451 EMAIL: <a href="mailto:Paul.Thompson@mrc-academy.org">Paul.Thompson@mrc-academy.org</a></p>
<p><b>Designated Teachers for Looked After Children</b></p>	<p>Mrs Claire Dickens TEL: 01730 812451 EMAIL: <a href="mailto:Claire.Dickens@mrc-academy.org">Claire.Dickens@mrc-academy.org</a></p>
<p><b>Principal/Principal</b></p>	<p>Mr Stuart Edwards TEL: 01730 812451 EMAIL: <a href="mailto:Stuart.Edwards@mrc-academy.org">Stuart.Edwards@mrc-academy.org</a></p>

## **POLICY STATEMENT**

This policy applies to Midhurst Rother College. United Learning Trust requires the College's Local Governing Body to review and update this policy annually (as a minimum). This policy is available on the Midhurst Rother College website. This policy is ratified annually by the United Learning Group Board.

This policy has regard to the following guidance and advice:

- Keeping Children Safe In Education (September 2019) ('KCSIE')
  - Disqualification under the Childcare Act 2006 (July 2018)
  - What to do if you're worried a child is being abused: advice for practitioners (March 2015)
  - Sexual violence and sexual harassment between children in Colleges and colleges (May 2018)
- Working Together to Safeguard Children (July 2018)
  - Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Revised Prevent Duty Guidance for England and Wales (July 2015)
  - The Prevent Duty: Departmental advice for Colleges and childminders (June 2015)
  - The use of social media for on-line radicalisation (July 2015)

This policy also takes into account the procedures and practice of West Sussex local authority and the published safeguarding arrangements set out by the West Sussex Safeguarding partners.

## **CONCERNS ABOUT A CHILD**

The College has a duty to consider at all times the best interests of the student and take action to enable all students to achieve the best outcomes. Safeguarding and promoting the welfare of children is **everyone's** responsibility. Everyone has a role to play in identifying concerns, sharing information and taking prompt action in accordance with this policy.

The College has arrangements for listening to children and providing early help and processes for children to raise concerns about themselves or their peers. Details of these arrangements are explained to the student in College where they can speak to safeguarding officers or any member of staff. The Safeguarding Team have posters around the College and there is a dedicated safeguarding email that can be used. Students can make self-referrals from the College website via any member of staff or independently and in person.

Staff should expect to support social workers and other agencies following any referral.

## **Definitions of Safeguarding and Types and Signs of Abuse**

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's 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.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

- physical abuse
- emotional abuse
- sexual abuse; and/or
- neglect.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse.

## **PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD**

If staff suspect or hear an allegation or concern of abuse or neglect from a child or any third party, they must follow the relevant procedure below. All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain to the child that staff will only share the information with those who need to know to help the child. All staff should explain next steps and who the information will be passed to.

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing. College recording requirements are conducted through the web package Cura “the record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it”.

Where there is a safeguarding concern, the College will ensure the student’s wishes and feelings are taken into account wherever possible and will work with them (and their families where appropriate) when determining what action to take and what services to provide. This is particularly important in the context of harmful sexual behaviours, such as sexual harassment and violence. The College manages this by the Student Council and **Do Not Keep It To Yourself!** Online form on the College website. Safeguarding information will often be special category personal data and the College will have due regard to its data protection obligations when sharing such data. Whilst the College aims to get consent to share information, relevant personal information may be shared without consent if there is a lawful basis to do so such as where a child’s safety may be at risk. This is because the Data Protection Act 2018 includes ‘safeguarding children and individuals at risk’ as a condition that allows information to be shared without consent. Any decision to share or withhold information will be recorded together with the reasons for it and who the information has been given to. The College operates its processes with the best interests of the student at their heart.

### **What staff should do if they have concerns about a child**

If staff (including governors, agency staff and volunteers) have any concerns about a child’s welfare they should act immediately, make an online Cura referral and or should speak with the College’s DSL Mr Kevan John or DDSLs Mrs Claire Dickens. If, in exceptional circumstances, the DSL or DDSLs is not available, this should not delay appropriate action being taken and staff should consider speaking to a member of the senior leadership team and/or take advice from local children’s social care. In these circumstances, any action taken should be shared with the DSL or DDSLs as soon as is practically possible.

The DSL will consider the appropriate action to take in accordance with the threshold document published by the College’s Safeguarding partners. Options will include:

- managing any support for the child internally via the College’s own pastoral support processes;
- making an early help assessment; or
- making a referral for statutory services.

If a child’s situation does not appear to be improving, the DSL (or the person that made the referral) should consider following local escalation procedures to ensure their concerns have been addressed and to ensure that the child’s situation improves.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. Staff should challenge any inaction and follow this up with the DSL and children’s social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

## Early Help

Any child may benefit from early help but all 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.

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 who consider that a student may benefit from early help should discuss this with the College's DSL or DDSLs. If early help is appropriate, the DSL will generally lead on liaising with relevant 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. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under constant review and consideration given to a referral to children's social care if the student's situation does not appear to be improving or is getting worse.

### **What staff should do if a child is suffering, or is likely to suffer from harm**

If staff (including governors, agency staff and volunteers) believe that a child is suffering, or is likely to suffer from harm, or is in immediate danger it is important that an **immediate** referral to children's social care (and/or the Police if appropriate) is made in accordance with West Sussex Local Authority referral process. Anyone can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The College's Local Safeguarding Partners are the school's local authority, clinical commissioning group for the local area, and chief officer of police for the police area in the local authority area and the locally agreed Safeguarding arrangements can be found here

[The Safeguarding partners - New arrangements link](#)

### **What staff should do if a child is seen as at risk of radicalisation**

Staff should follow the College's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or speak to the DSL/DSLs for submitting a referral form to MASH or call them directly. Advice and support can also be sought from children's social care.

The College, in recognition that students may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Principal, DSL or DDSLs and governors responsible for safeguarding to ensure the College's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

### **What staff should do if they discover an act of Female Genital Mutilation ('FGM')**

All staff should speak to the DSL or DDSLs about any concerns about FGM. Teaching staff have a separate duty to report to the Police cases where they discover that an act of FGM appears to have been carried out on a girl under the age of 18. All staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect or discover that a student may be at risk of FGM.

### **What staff should do if a child goes missing from education**

Children who go missing from education, particularly on repeat occasions, is a potential indicator of a range of safeguarding possibilities. The College's procedures for unauthorised absence and for dealing with children who go missing from education are found in the College's [Children Missing in Education Policy](#). Further detail can also be found at Appendix 1 of this policy.

The College will report to the West Sussex Local Authority a student who fails to attend College regularly or has been absent from College without the College's permission for a continuous period of 10 College days or more.

### **What staff should do if they have concerns about another staff member (including volunteers)**

If staff have safeguarding concerns, or an allegation is made about another staff member posing a risk of harm to children, then this should be referred to the Principal. Where there are concerns/allegations about the Principal, this should be referred to the Chair of the LGB and Principal of Safeguarding. In the event of concerns/allegations of abuse being made, staff are referred to the procedures below regarding managing allegations of abuse against staff (including volunteers) and United Learning Guidance on Dealing with Allegations of Abuse against Teachers and Other Staff (available on the United Learning Hub).

### **What staff should do if they have concerns about safeguarding practices in the College**

Where staff have concerns about poor or unsafe practices and potential failures in the College's safeguarding regimes, these should be raised in accordance with the College's whistleblowing procedures which can be found on the Midhurst Rother College website. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the College, feel that their genuine concerns are not being (or have not been) addressed or are concerned about the way a concern is being handled, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

### **ARRANGEMENTS FOR DEALING WITH PEER-ON-PEER ALLEGATIONS**

Safeguarding issues can manifest themselves via peer-on-peer abuse. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). The College recognises the gendered nature of peer-on-peer abuse (i.e. that it is more likely that girls will be "victims" and boys "perpetrators") and that it can manifest itself in many ways and can include (but is not limited to) sexting, sexual assault, gender-based issues and harmful sexual behaviours including sexual violence and sexual harassment.

Peer-on-peer abuse can be associated with factors outside the College and can occur online and offline and between children of any age or gender. The College therefore takes a contextual safeguarding approach to managing peer-on-peer abuse.

Peer-on-peer abuse is abuse and is never acceptable. It should never be passed off or dismissed as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”.

The College takes the following steps to minimise the risk of peer-on-peer abuse. The School takes the following steps to minimise the risk of peer-on-peer abuse. Students have access to assemblies which deal directly with these issues. PSHCE programmes are structured around the Real Love Rocks programme of learning (Barnados). Issues of consent, bullying and peer on peer abuse are dealt with in an age appropriate way throughout the PSHCE programme from Year 7 onwards.

The College’s approach to sexting is guided by the advice for schools: responding to and managing sexting incidents published by SWGFL and the UK safer internet centre [READ HERE](#). All incidents are recorded and the response of the school is decided based on guidance above. Outside agencies including police and social care are involved as appropriate or necessary. Staff are also referred to United Learning E-Safety Policy (available on United Learning Hub).

Where an issue of student behaviour or bullying gives ‘reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm’, staff should follow the procedures below rather than the College’s Anti-Bullying and Behaviour policies:

### **What to do if staff suspect that a child may be at risk or hears a report of peer-on-peer abuse**

The procedures set out below have been developed following consultation with students, staff and parents] and will be reviewed, at least annually, in light of an assessment of the impact and effectiveness of the policy.

In the event of disclosures about peer-on-peer abuse, all children involved will be treated as being at risk and the safeguarding procedures in accordance with this policy will be followed (see ‘*Procedures for dealing with concerns about a child*’). This means that if a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay so that a course of action can be agreed.

The College recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

All concerns/allegations of peer-on-peer abuse will be handled sensitively, appropriately and promptly and will be investigated including consideration of the wider context in which it may have occurred (as appropriate). The College treats all children involved as being at potential risk and ensures a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it. **Immediate** consideration will therefore be given as to how best to support and protect all children involved/impacted.

The College will take into account the views of the child/children affected. Unless it is considered unsafe to do so, the DSL should discuss the proposed action with the child/children and their parents following appropriate liaison with children’s social care. The College should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.



All children affected by peer-on-peer abuse will be supported by the Safeguarding and Pastoral teams and support from external agencies will be sought, as appropriate. The College may also use the services of the Counsellor. "Victims" will be reassured that they are being taken seriously and that they will be supported and kept safe. The College recognises that children with special educational needs and disabilities can be more prone to peer on peer group isolation than other children and will consider extra pastoral support for those children. To address these additional challenges, the College has put in place the following pastoral support measures; tutor reports; pastoral leader interventions; opportunities to use areas of the SEN department for a quiet space with friends; eating lunch with the TA's in the canteen; opportunities to use the library space and the support from the Engagement and Support Unit.

A student against whom an allegation of abuse has been made may be suspended from the College during the investigation. The College will take advice from the LCSB on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged "victim" and "perpetrator". If it is necessary for a student to be interviewed by the Police in relation to allegations of abuse, the College will ensure that, subject to the advice of the LCSB, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the College and advice will be sought as necessary from the LCSB and/ or the Police as appropriate.

### **Reports concerning harmful sexual behaviour**

Where a report concerns an allegation of sexual violence and/or sexual harassment, if possible two members of staff should be present when managing a report (preferably one of them being the DSL or DDSLs). The DSL or DDSLs should be informed as soon as practically possible if they were not involved in the initial report.

Consideration of safeguarding all those children involved in the safeguarding report will be immediate. Following a report of sexual violence and/or sexual harassment the DSL will therefore consider the appropriate response. This will include:

- The wishes of the victim,
- The nature of the alleged incident,
- The ages of the children involved,
- The developmental stages of the children involved,
- Any power imbalance between the children,
- If the alleged incident is a one-off or sustained pattern,
- Any ongoing risks,
- Other related issues and context.

Any response and action will, as always, have at the centre the best interests of the child. The DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report.

When there has been a report of sexual violence, the DSL (or a deputy DSL) should make an immediate risk and needs assessment in respect of each child affected by the abuse. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the "victim";
- the alleged "perpetrator"; and
- the other children (and, if appropriate, staff) at the College.

The DSL will consider as part of the College's response, the context within which such incidents and/or behaviours occur and the importance of anonymity. Risk assessments will be recorded (either written or electronic) and kept under review. The DSL will consider the risks posed to all students and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the "victim" and alleged "perpetrator" and considerations regarding shared classes, sharing College premises and College transport. Any professional risk assessment will inform the College's approach.

The police may be informed of any harmful sexual behaviours including sexual violence and sexual harassment which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. A report to the police will generally be made in parallel with a referral to children's social care.

If the DSL decides to make a referral to children's social care and/or a report to the police against a "victim's" wishes, the reasons should be explained to the student and appropriate specialist support offered. The DSL or DDSLs will also work closely with children's social care and other agencies are required to ensure any action taken under this policy does not jeopardise any statutory investigation and to discuss how the alleged "perpetrator", staff, parents and others will be informed of the allegations and what information can be disclosed bearing in mind the need to protect those involved and their anonymity.

Regardless of the outcome of any criminal process, including where a child is subject to bail, the DSL will liaise with the police and children's social care to ensure the welfare and safety of all children and update the risk assessment and ensure relevant protections and measures are in place for all children.

The College will consider whether disciplinary action may be appropriate for any child/children involved. Before deciding on appropriate action the College will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the peer-on-peer abuse and the causes of it. Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the College.

The DSL will ensure that where children move to another educational institution following an incident of peer-on-peer abuse, the new institution is made aware of any ongoing support needs and, where appropriate, any potential risks to other children and staff.

The College recognises that good record-keeping and monitoring of sexual violence and sexual harassment reports is essential and assists the College in meet its Public Sector Equality Duty.

#### **ARRANGEMENTS FOR DEALING WITH CONCERNS/ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF (INCLUDING THE PRINCIPAL, GOVERNORS AND VOLUNTEERS)**

The College's procedures for managing concerns/ allegations against staff who are currently working in the College follows Department for Education statutory guidance and LCSB arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a student, or may have harmed a student;
- Possibly committed a criminal offence against or related to a student; or
- Behaved towards a student in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO.

If an allegation is made against anyone working with children in the College, the College should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the College may discuss informally with the 'designated officer' on a no-names basis.

All allegations should be investigated as a priority to avoid any delay.

1. All allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Principal. Where the Principal is absent or is the subject of the allegation or concern, reports should be made to Chair of the LGB and Principal of Safeguarding. Where the Principal is the subject of the allegation or concern, the Principal must not be informed of the allegation prior to contact with Chair of the LGB, Principal of Safeguarding and designated officer.
2. The case manager should immediately discuss the allegation with the designated officer and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer should be informed within one working day of all allegations that come to the College's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.
3. The case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
4. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the designated officer and *KCSIE* when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the College and shall provide them with their contact details.
5. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.
6. The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the College ceases to use their services, or the person resigns or otherwise ceases to provide their services. The College has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the College must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

7. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the College's safeguarding procedures or practices to help prevent similar events in the future.

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

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Principal will consider whether any disciplinary action is appropriate against a student who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a student.

### **STAFF BEHAVIOUR POLICY / CODE OF CONDUCT**

The College uses the United Learning's "Notes of Guidance for Staff-Student relationships 2018" can be found on the United Learning Hub The aim of this document is to provide clear guidance about behaviour and actions so as to not place students or staff at risk of harm or of allegation of harm to a student.

### **SAFER RECRUITMENT**

The College is committed to safer recruitment processes and ongoing safer working practices. Members of the teaching and non-teaching staff at the College including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role.

For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. Under no circumstances will an individual commence work unsupervised in sole charge of, or in unaccompanied contact with, children without a cleared DBS check. In this case, the individual will have a separate Barred List check and the College will undertake a written Risk Assessment exercise in relation to the proposed work. All other safeguarding checks will be completed and the individual will be appropriately supervised. Please refer to Section C and Appendix 5 of the 'Safeguarding Children – HR Procedural Guidance' available on the United Learning Hub for further guidance.

Full details of the College's safer recruitment procedures for checking the suitability of staff, members of the College LGB and volunteers to work with children and young people is set out in

- United Learning / the College's Recruitment and Selection Policy;
- United Learning's Safeguarding Children – HR Procedural Guidance;
- United Learning's LGB Handbook; and
- United Learning's guidance: Trustees - Recruitment, Appointment, and Removal Process

These documents are available on the United Learning Hub.

The College's protocols for ensuring that any visiting speakers, whether invited by staff or students themselves, are suitable and appropriate supervised is set out in the College's Recruitment and Selection Policy.

## **MANAGEMENT OF SAFEGUARDING**

The College's DSL is Mr Kevan John who is a member of the leadership team.

Mrs Claire Dickens is the DDSLs and the person to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times.

The DSL and DDSLs contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the College. The DSL's responsibility is to maintain an overview of safeguarding within the College, to open channels of communication with local statutory agencies, to liaise closely with children's social care and the police), support staff in carrying out their safeguarding duties children's social care and the police), support staff in carrying out their safeguarding duties and to monitor the effectiveness of the College's policies and procedures in practice. The DSL and DDSLs are most likely to have a complete safeguarding picture and be the most appropriate person to advise on a response to a safeguarding concern.

The DSL works with the College's LGB to review and update the College's safeguarding policy. Where a student leaves the College, the DSL will also ensure their child protection file is transferred to the new College (separately from the main student file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt. The DSL will also consider if it would be appropriate to share any information with the new College in advance of a child leaving. For example, information that would allow the new College to continue supporting victims of abuse and have that support in place for when the child arrives. The College will ensure that key staff, such as the SENCO, are also aware of these arrangements, as required.

The DSL will inform the safeguarding partners of any incident which they think should be considered for a child safeguarding practice review.

The DSL regularly reviews the College's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in their absence, to a member of the senior management team or directly to local children's services.

The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL and/ or DDSLs will always be available (during College hours) for staff in the College to discuss any safeguarding concerns. For out of hours/out of term activities, the College's arrangements are to direct the colleague to the LCSB if guidance and support is required and if it is an urgent matter of child safety to contact the police directly on 999.

Full details of the DSL's role can be found at Annex B of *KCSIE*.

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

## **TRAINING**

Induction and training (including online safety) are in line with advice from LCSB OR local safeguarding partners.

### **All Staff**

All new staff will be provided with induction training that includes:

- the child protection policy, including information about the identity and role of the DSL and DDSLs
- the behaviour policy

- the safeguarding response to children who go missing from education
- the staff United Learning's "Notes of Guidance for Staff-Student relationships 2018" including the College's whistleblowing procedure and the acceptable use of technologies policy, staff/student relationships and communications including the use of social media
- a copy of Part 1 of *KCSIE*
- College leaders and staff who work directly with children will also be required to read Annex A of *KCSIE*

Induction training usually takes place within seven (7) working days of staff commencing work. Copies of the above documents are provided to all 'staff' during induction. On appointment and as part of United Learning Annual Declaration, all staff will receive and sign the up to date versions of the Staff Student Relationship Letter and Acceptable Use Declaration. The staff United Learning's "Notes of Guidance for Staff-Student relationships 2018" can be found on the United Learning Hub and a paper copy is given to all colleagues at the start of each year.

Temporary staff and volunteers are provided with safeguarding training from either the DSL the business manager who is DSL trained or the DDSLs.

All staff are also required to:

- Read Part One of *KCSIE* and confirm that they have done so via a signed form. Each time Part One of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via INSET.
- Understand key information contained in Part One of *KCSIE*. The College will ensure staff understanding by ensuring all staff complete online EduCare training; this can be tracked for completion and certification.
- Receive training in safeguarding and child protection regularly, in line with advice from the LCSB. Training will include online safety and harmful sexual behaviours including sexual violence and sexual harassment between children. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help. All staff will also be made aware of the local early help process and understand their role in it.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The College provides these via, INSET, staff meeting, emails and all colleagues must complete a child protection module at level 2 provided by EduCare.

## **DSL**

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, supporting SEND children particularly when online, overseeing online safety in College, record keeping and promoting a culture of listening to children, training in the LCSB (until such time as they are replaced with local safeguarding partners approach to *Prevent* duties and harmful sexual behaviours). Further details of the required training content for the DSL are set out in Annex B of *KCSIE*.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

The DDSLs is trained to the same level as the DSL.

## **OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES**

Sarah Squire is the board-level lead designated to take a lead in relation to responsibility for the Trust's safeguarding arrangements. Revd Dave Willis is the LGB lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the College. He is a member of the College's LGB.

A review of the College's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. The College had an external review by United Learning's Safeguarding Leads for the past two years and this will continue this academic year. The College draws on the expertise of staff, including the DSL(s), in shaping the College's safeguarding arrangements and policies:

If there has been a substantiated allegation against a member of staff, the College will work with the Local Authority designated officer to determine whether there are any improvements to be made to the College's procedures or practice to help prevent similar events in the future.

## **THE COLLEGE'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES**

### **Teaching children how to keep safe**

The local governing body OR United Learning Trust ensures that all students are taught about safeguarding, including online, through the curriculum, Relationships and Sex Education and PSHE to help children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation. This includes teaching students about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. It will also include teaching students, for example about healthy relationships, consent and that sexual violence and sexual harassment is always wrong. The Government has made regulations which will make these subjects of Relationships Education and Relationships and Sex Education for secondary and Health Education (for all pupils in state funded schools including academies) mandatory from September 2020.

The College recognises the additional risks that children with SEND face online and works with the Principal of IT to ensure that additional support and measures are in place to support these children. Online safety is an integral part of the College's ICT curriculum and also embedded in PSHE and Relationships and Sex Education. Pupils will be taught what positive, healthy and respectful online relationships look like; the effects of their online actions on others; how to recognise and display respectful behaviour online; how to use technology safely, responsibly and securely; and where to go for help and support when they have concerns.

The College has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. The College's systems are Baracuda web filtering, Lanschool web filters/VNC/Student login monitoring systems. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm. Further detail of the College's approach to online safety can be found within our Mobile Device Policy on our website.

### **Looked after children (and previously looked after children)**

Looked after children (and previously looked after children) are a particularly vulnerable group. The College will ensure that prompt action is taken when necessary to safeguard these children and the United Learning Trust ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after (and previously looked after) by a local authority.

Mrs Claire Dickens is the designated member of teaching staff who has responsibility for their welfare and progress and to ensure that the needs identified in personal education plans are met. The College ensures that the designated member of staff receives appropriate training in order to carry out their role and has the information they need in relation to any child's looked after status, their care arrangements (including contact arrangements with birth parents and those with parental responsibility) and details of the child's social worker and virtual College Principal.

The designated member of staff will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care and will work closely with virtual College Principals to promote their educational achievement. The DSL will ensure they have details of the local authority Personal Advisor appointed to guide and support any care leavers and will liaise with them as necessary regarding any issues of concern affecting them.

### **Use of 'reasonable force'**

The College recognises the additional vulnerability when using reasonable force in response to risks presented by incidents involving children with SEND or with medical conditions. The College will consider its duties under the Equality Act 2010 and their Public Sector Equality Duty. Positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers can reduce the occurrence of challenging behaviour and the need to use reasonable force.

Please see the Physical restraint, Contact and Intervention policy [HERE](#)

### **Arrangements for Visiting Speakers**

The College has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable<sup>1</sup>. The College's responsibility to students is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the College and British values.

The College is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the College. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the College may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the College site, will be supervised by a College employee. On attending the College, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The College shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy. All visitors to the College must sign in via an iPad which takes a photograph of the visitor and this is printed onto their visitor's badge.

Students placed in College will have the educational establishments safeguarding process reviewed as an additional measure taken to safeguard students and for off-site tuition and performances away from the College.



All Sixth Form students in peer mentoring positions have adequate staff supervision, training and measures to counter possible abuses of the role and received appropriate training on managing any concerns about their peers. All Students have safeguarding training from the DSL.

All staff are also referred to the United Learning Risk Assessment Policy (available on the United Learning Hub).]

## APPENDIX 1 –SIGNS AND TYPES OF ABUSE

All College staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. They can occur from within or outside families, in or out of College, from within peer groups or the wider community and/or online. In most cases, multiple issues will overlap with one another and children can therefore be vulnerable to multiple threats.

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

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

**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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

**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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Specific safeguarding issues:** behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via peer-on-peer abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults and sexting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

**Child Sexual Exploitation (CSE):** CSE is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (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; can still be abuse even if the sexual activity appears consensual; can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity; can take place in person or via technology, or a combination of both; can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence; 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); can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Some of the following signs may be indicators of sexual exploitation:

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

CSE is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of drugs trafficking. The DSL or DDSLs will consider a referral to the National Referral Mechanism as soon as possible if there are county line concerns, such as a child being a potential victim of modern slavery or human trafficking.

**So Called 'Honour Based' Violence:** encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. It can include multiple perpetrators.

[FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. ]

If staff have a concern that a student may be at risk of HBV or has suffered HBV, they should speak to the DSL (or DDSLs). As appropriate they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care.

There is a statutory duty on teachers to personally 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. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a student is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a student over 18, teachers should follow the College's local safeguarding procedures.

**Forced Marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent 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. Colleges and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. College staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

**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, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces.

There is no single way of identifying a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through different methods such as online. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include the DSL or DDSLs making a referral to the Channel programme.

**Special Educational Needs and/or Disabilities:** Students with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect. Students with SEND are more likely to be abused by their peers. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

To address these additional challenges, the College has put in place the following pastoral support measures; tutor reports; pastoral leader interventions; opportunities to use areas of the SEN department for a quiet space with friends; eating lunch with the TA's in the canteen; opportunities to use the library space and the support from the Engagement and Support Unit.

Staff will support such students in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate. Any reports of abuse involving children with SEND will entail close liaison with the DSL or DDSLs and named person with oversight for SEN.

**Lesbian, Gay, Bi or Trans (LGBT):** Children who are LGBT can be targeted by their peers. In some cases, a student who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

**Children and the court system:** Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed, and this will be stressful for them. Making child arrangements following separation can also be stressful and entrench conflict in families. Staff should be alert to the needs of such students and report any concerns to the DSL or DDSLs in accordance with this policy.

**Children who go missing from education or College:** A child going missing is a potential indicator of a range of safeguarding possibilities, such as abuse or neglect. Where possible the College holds more than one emergency contact number for each student so additional options are available to make contact with a responsible adult when a child goes missing is also identified as a welfare and/or safety concern.

Staff must follow the College's procedures for dealing with children who go missing, particularly on repeat occasions. The College's procedure for dealing with children who go missing can be found in the [College's Missing Children Policy](#). All unexplained or unauthorised absences will be followed up in accordance with this policy.

The College shall inform the local authority of any student who is going to be added to or deleted from the College's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory College age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

College attendance registers are carefully monitored to identify any trends. The College will inform the West Sussex Local Authority of any student who fails to attend College regularly, or has been absent without the College's permission for a continuous period of 10 College days or more, at such intervals as are agreed between the College and the local authority.

Action should be taken in accordance with this policy if any absence of a student from the College gives rise to a concern about their welfare.

**Children with family members in prison:** Children who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Staff should be alert to the needs of such students and report any concerns to the DSL or DDSLs in accordance with this policy.

**Domestic Abuse:** domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological; physical; sexual; financial; and emotional abuse.

**Homelessness:** Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. The DSL or DDSLs will raise/progress any concerns about homelessness with the Local Housing Authority although this does not replace a referral into children's social care where a child has been harmed or is at risk of harm.

**Peer on peer abuse:** peer on peer abuse can take many forms and can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; up skirting (which is a criminal offence and

typically involves taking a picture under a person's clothing without the knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation distress or alarm); sexting and initiating/hazing type violence and rituals. Girls, students with SEND and LGBT children are more at risk of peer-on-peer abuse.

Signs that a child may be suffering from peer-on-peer abuse can also overlap with those indicating other types of abuse and can include:

- failing to attend College, disengaging from classes or struggling to carry out College related tasks to the standard ordinarily expected;
- physical injuries;
- experiencing difficulties with mental health and/or emotional wellbeing;
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much;
- broader changes in behaviour including alcohol or substance misuse;
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age;
- abusive behaviour towards others.

Sexual violence and sexual harassment, as a type of peer on peer abuse, may overlap and can occur online and offline (both physical and verbal). Sexual violence are sexual offences of rape, assault by penetration and sexual assault. Sexual harassment is unwanted conduct of a sexual nature and 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. Examples of sexual harassment include sexual comments sexual "jokes" or taunting; physical behaviour such as deliberately brushing against someone; non-consensual sharing of sexual images and sexualised online bullying.

**Serious Violence:** Indicators that a child may be at risk from, or involved with, serious violent crime include increased absence from school; change in friendship or relationship with older individuals or groups; a significant decline in performance; signs of self-harm; 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.

If staff have a concern about a child or a child make a report to the, staff should follow the referral process in this policy. If staff are in any doubt about what to do they should speak to the DSL or DDSL.

If staff have a concern about a child or a child make a report to the, staff should follow the referral process in this policy. If staff are in any doubt about what to do they should speak to the DSL or DDSLs.

### APPENDIX 3 – Safeguarding Training Log

Safeguarding Training Log – Academic Year 2019-2020		
Attendees	Type of training provided	Date undertaken
Principal/Principal Stuart Edwards	Child Protection Training	September 2019
<b>DSL</b> Designated Safeguarding Lead Kevan John	Designated Safeguarding Lead Level 3 Safeguarding Lead	November 2019
<b>DDSLs</b> Claire Dickens Kath Chard Paul Thompson		July 2019 October 2019 June 2019
Paul Thompson (e-safety Lead)	CEOP Lead Training	June 2019
Pastoral Leads	Child Protection Level 2	July 2018
Whole College Staff	INSET/Child Protection level 2 EduCare package	September 2019
Chair of Governors of LGB David Lawes		September 2019
Nominated Safeguarding Governor of LGB Dave Willis		September 2019
Local Governing Body (whole board)	DSL Safeguarding training	September 2019

First Aid		
Richard Bentley	FAW First Aid at Work (3 Days)	May 2018
Tom Chaplin	FAW First Aid at Work (3 Days)	March 2017
Claire Dickens	True Adventure Certificate	June 2018
Aaron Hancock	FAW First Aid at Work (3 Days)	May 2018
Simon Hills	FAW First Aid at Work (1 Day)	March 2017
Caroline Reid	FAW First Aid at Work (3 Days)	May 2018

Student Receptionist/First Aider Sue Fowler	FAW First Aid at Work (3 Days) Child Protection level 2 EduCare package	June 2019 June 2019
Paediatric First Aiders Simon Taplin	FAW, + AED Instructor, Assessors requalification	October 2018
Heide Evans	EFAW Emergency First Aid at Work (1 Day)	January 2017
Premises Manager Hugh McClarnon	EFAW Emergency First Aid at Work (1 Day)	December 2016
Assistant Premises Officer Ian Fumagall Adrian Banbury	EFAW Emergency First Aid at Work (1 Day) FAW First Aid at Work (3 Days)	December 2016 October 2018
Other		

## APPENDIX 4 – STAFF/STUDENT RELATIONSHIP LETTER AND GUIDANCE NOTES

### Midhurst Rother College

September 2019

Dear Colleague

Every one of us working within United Learning, whatever our role, is acutely aware that the protection of children is of the highest possible importance. Trust underpins everything that we do in schools. The parents of our pupils entrust the care of their children to us and together we are all responsible for their wellbeing. United Learning also has a responsibility to ensure that those working in our schools are themselves protected - against putting themselves in a vulnerable position and against the possibility of false accusation.

This letter has also been prompted by the isolated actions of a tiny handful of employees who have acted improperly or who have found themselves – or who have put themselves – in a vulnerable position. Increasingly, this is in relation to the inappropriate use of social media. These instances have all led to disciplinary action including in the most serious cases dismissal for gross misconduct. I am writing to every person employed by United Learning to remind us all just how serious these matters are but also to offer some advice as to how to respond in potentially difficult situations.

Heads will discuss this issue with their staff at appropriate times during the school year. This letter reinforces those statements and ensures that no-one associated with our schools is in any doubt that child protection is an issue that must be treated with the utmost seriousness. Acts of child abuse may be blatant and incontrovertible. However, they may also be more subtle.

It must be understood that the following are almost always inappropriate within the professional context of schools and can easily be construed as child abuse in some circumstances:

- touching and physical contact, other than for staff working with very young children in primary or nursery settings, where it is expected that they will have necessary physical contact and display affection to properly fulfil their role to nurture, support and care for those children;
- contact through electronic or digital communications using personal accounts.

Against this background, we must ensure that no situation could arise which is or could reasonably be construed as acting against the safety of each child. This is not always an easy line to draw but crossing that line, or being in a position where it appears that the line has been crossed, is unacceptable. Some adults within the school undertake roles where this is even more important because of the ease with which the proper execution of their duties might be misinterpreted or because the vulnerability of the young people in their care might be more easily exploited. These might include those:



- working in boarding houses or residential situations, including, for example, school trips and excursions;
- whose work requires them to interact in a one to one situation, particularly when that work takes place behind closed doors as is often the case with peripatetic music lessons;
- whose work by its nature requires some physical contact with children, for example, those working with very young children and those involved in the coaching of sport or other practical subjects where a correct technique may need to be demonstrated;
- who have high levels of access to ICT systems and, indeed, all who use the internet, email, text messaging and other forms of electronic communication;
- young employees and workers whose duties require them to work with older pupils (e.g. sixth formers) where the age differential is quite small;
- who work with especially vulnerable children for example those with special educational needs, disabilities, mental illness or those that require intimate care.

Within each school, Head Teachers will issue both verbal and written guidance from time to time and will make available appropriate training to help everyone deal with this difficult issue. A statement of guidance follows this letter. The DfE has published updated guidance for all schools on their duties to safeguard and promote the wellbeing of children, ['Keeping Children Safe in Education' \(DfE, September 2019\)](#). It is important that you are familiar with this guidance and, as a statutory minimum, have read and can demonstrate your understanding of your responsibilities in relation to Keeping Children Safe in Education Part 1 and Annex A.

Finally, having said all this, it is still important for all of us to retain an appropriate balance. The United Learning Board greatly appreciate the devotion and commitment of all of you who work in our schools. We know that your work is effective because every day you respect and care for children, enjoy their company and celebrate their achievements. The trust placed in us as we guide young people through their formative years is huge; we all need to help each other shoulder this responsibility to the very best of our ability.

Yours sincerely



Jon Coles  
Chief Executive  
United Learning



Stuart Edwards  
Principal  
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This guidance is not exhaustive and is designed to set out principles rather than to give detailed and specific advice. Clearly, the circumstances in which staff work vary (e.g. working with very young children, boarding staff, sports staff, etc.); this guidance is meant to give general principles only. Indeed, for staff working with very young children in primary or nursery settings it is expected that they will have necessary physical contact and display affection to properly fulfil their role to nurture, support and care for those children. Although this advice applies primarily to teachers and to other adults with educational roles, all adults working within schools relate to students during the course of their duties; again, the general principles apply equally to all who are involved in the school. Staff should be aware that departure from this guidance could result in disciplinary action.

1. The relationship between staff and students is a professional one. It is fully expected – and, indeed, hoped – that staff in the school have a friendly and caring relationship with students; nevertheless, the basis of that relationship is professional not personal. It is suggested that a good test to apply is to reflect on whether the child’s parents would be happy with the relationship if they were standing with you.
2. A personal relationship between staff and a student is inappropriate unless it is with the full knowledge and consent of the student’s parents or guardians. Circumstances in which such a personal relationship may arise might be when your own children are friends with those in the school or when you have a personal relationship with parents of children in the school. It is not normally appropriate for a member of staff to meet with a student out of school hours or off school premises except with the prior knowledge and consent of parents and the College.
3. In general, unnecessary physical contact with students must be avoided. In some circumstances, physical contact between a member of staff and a student is necessary and beneficial; it might be, for example, that a Reception teacher might need to pick up a 5 year old who has fallen over in the playground, a sports coach may need to demonstrate to a student how to hold a racket or a secondary teacher may give a student a gentle pat on the back as encouragement. In rare circumstances it may be appropriate for members of staff to use reasonable restraint in circumstances where a student is behaving in a manner which endangers him or herself or other people. In these situations, staff are advised to be very sensitive to the student’s likely reaction and to watch out for signs that the student is apprehensive or uncomfortable. We all have our own personal space that needs to be protected.
4. Over-familiar words and actions, displays of affection, discussion of one’s personal life or the personal life of the student are almost always inappropriate. Sexual innuendo is wrong in all circumstances. Staff must avoid actions, words or expressions that could be interpreted as suggesting that they have an emotional relationship with any student. In the professional staff-student relationship it is not appropriate to single a student out for favours or to suggest to a student that he or she is a special friend.
5. Occasionally it is necessary for professional academic reasons for staff to communicate with students out of school. Except where absolutely necessary, personal email addresses, home, mobile phone numbers, social media contact details or text based messaging aliases must not be given, asked for or used. A staff mobile phone number might be given to students for use during an educational visit; where possible, the school’s mobile phone (if there is one) should be used for this purpose. Pastoral matters should not normally be dealt with by personal email or using personal phone contacts. Only in the most exceptional circumstances, for instance, 31 where there is well-founded concern for the unexplained whereabouts of a student, should pastoral matters be dealt with by personal email, using personal phone contact or other personal communication tools. In any event, records of all

contacts must be kept on the student file so that if it is necessary to use email or personal contact, the reason why will be specified in the written record.

It is very difficult to envisage circumstances under which individual contact is appropriate except through official school channels.

6. It is not normally appropriate for students to visit a member of staff in their own home. Such a visit might be more likely within a boarding context where staff live on site and so might invite a group of students— say, a tutorial group – to their house for a meeting or for a celebration. Where such a visit does take place, it must be with the full knowledge and consent of the School and parents/guardians. If possible, more than one adult should be present on such an occasion.
7. With older students, where a gathering is held as part of a celebration, it is generally advisable if that is held on school premises. It is essential that professional criteria (e.g. all the students in a particular teaching or tutorial group) rather than personal criteria (e.g. selected students only) are used for inviting students, that the event is held openly, and that senior colleagues are aware of it. Staff on such an occasion have a particular duty to ensure that the supply and consumption of alcohol is appropriate, is responsible and falls within the law and the school's guidelines on alcohol. As a rule, staff should not consume alcohol whilst in the company of children. This includes educational visits and celebratory functions. There will be occasional situations where alcohol is served either at a meal or school function and in these instances should be approved by the Head Teacher in advance.
8. Wherever possible when working with students, other people (adults, colleagues or students) should be present or the door should be open. All members of staff who, in the course of their professional duties, need to work on a one-to-one basis with a student (e.g. a piano lesson, a maths tutorial, etc.), must take care to ensure that the circumstances of the meeting or lesson are always entirely professional. Staff are advised to use a room which has vision panels in the door or keep the door open and ensure that colleagues know that the meeting or lesson is taking place. It is helpful if the meeting or lesson can be arranged during normal school hours or immediately before or after school when there are plenty of other people about. Similarly, where it is necessary for staff to drive students in their own cars, e.g. to sporting fixtures, drivers should ensure they are not alone with just one student, written parental consent should be obtained and a central dropping off point arranged rather than home drops.
9. Staff must avoid threatening words, raised voices and any aggressive contact such as holding, pushing, pulling or hitting, which could amount to or which could be interpreted as a criminal assault.
10. There are circumstances when it is appropriate for staff to use reasonable force to safeguard children and young people. The term 'reasonable force' covers a broad range of actions that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent injury or violence. 'Reasonable' in these circumstances means 'using no more force than is needed'. This may involve either passive physical contact, such as standing between pupils, or active physical contact such as leading the pupil by the arm. Current DfE guidance is contained in 'Using Reasonable Force: Advice for head 32 teachers, staff and governing bodies' which can be found on United Hub. Members of staff must also ensure they are familiar with the Independent School's/Academy's physical restraint policy and Procedures document.
11. Social networking sites used for personal use, such as Facebook, Twitter, Instagram and other social media, pose risks for all staff in terms of professional integrity and the welfare of students.

- (a) Staff must not use these sites to contact or communicate with current students, students who have recently left, or ex-students under the age of 18 or who are still in full time education. Employees wishing to befriend students who are over 18 and who have left school should do so with extreme caution and with the knowledge that any content posted on either ex-students' or their own social network, may not only compromise their own position but that of any colleagues with whom they are also friends and who may not want their content to be seen by any ex-student. Unfortunately, some students post information on their social networking sites which is inappropriate in language or visuals. To view such pages may alter your judgement of students, to be known to be viewing them may alter a student's view of you, and to comment to students about what you have seen is likely to have an impact on your professional reputation, as well as possibly causing distress to students concerned.
- (b) Social media should not be used to address concerns regarding a student's welfare, which should instead be raised with an appropriate member of the school's SLT or safeguarding team.
- (c) Caution should also be taken when staff become friends with parents of children at the school, or staff with children at the school, when posting or commenting on posts within social media and ensure that they do not put themselves at risk of any accusations or bring their school into disrepute.
- (d) Should you become aware of material about yourself, the school, a student, a colleague or the Group, which is inappropriate, the Senior Leadership Team must be informed and they will instruct a member of staff to check the allegations and inform the appropriate authorities. You must not check it out yourself.

12. Social networking sites used for professional use, such as LinkedIn, Twitter, YouTube, and other social media, also pose risks for all staff in terms of professional integrity and the welfare of pupils

- (a) Before using social media for professional purposes, or as part of their teaching, staff should seek guidance and training on the risks associated with using social media.
- (b) Staff should not follow students' personal social media feeds even though it is likely that students will be following them. It may be appropriate to follow students if done as part of an educational activity but this should be properly risk assessed and not using students' personal accounts.
- (c) Staff are advised not to accept connection requests on sites such as LinkedIn from students. Accepting requests from ex-pupils post 16 or 18 should be used with care and thought given to how much information is visible to connections – phone numbers, email addresses etc.
- (d) When uploading images or posting content on social media platforms, you should not link to children's online personas through tagging or mentions as this will increase the risk to them from online threats. You should also ensure you comply with the school image use policy; such as not including names with pictures and ensuring parental permission has been given before posting a child's image.
- (e) All content posted will be linked to you and your employer. Should you become aware of material about yourself, the school, a pupil, a colleague or the Group, which is inappropriate, the Senior Leadership Team must be informed and they will instruct a member of staff to check the allegations and inform the appropriate authorities. You must not check it out yourself.

13. If you are at all concerned about anything which has occurred or which has made you uncomfortable, you must discuss the matter with a senior colleague at the earliest opportunity, even if it turns out

that nothing untoward has happened. You must make a written record, dated and signed, of any such incident.

14. Where any allegation of abuse is made against a teacher, other member of staff or volunteer, the Group is committed to dealing with the allegation fairly, quickly and consistently, in a way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.
15. Staff will also find information relevant to staff-student relationships in the policies and procedures in their school or academy which they should make themselves familiar with and cover the following:
  - (a) Safeguarding Policy and Child Protection Policy and Procedures;
  - (b) Behaviour and Discipline;
  - (c) Physical Restraint;
  - (d) Email and Internet Acceptable Use Policy;
  - (e) Social Media Policy.