

Child Protection and Safeguarding Policy

2023 -2024

St Albans Independent College

Table of contents

- **Safeguarding Legislation and statutory guidance**
- **Safeguarding team**

1. Introduction and aims
2. Equality statement
3. Definitions
4. Roles and responsibilities
5. Procedures for reporting and recording a concern
6. Recognising abuse
7. Reporting FGM concerns
8. Reporting radicalisation concerns
9. Recognising Mental health concerns
10. Recognising Child Criminal exploitation
11. Recognising Child Sexual exploitation
12. Child-on-child abuse
13. Serious violence
14. Looked after and previously looked after children
15. Students with a social worker
16. Students with special education needs and disabilities
17. Children who are absent from education
18. Elective home education
19. Record keeping
20. Confidentiality, data protection, GDPR, and information sharing
21. Safeguarding training for staff
22. Whistleblowing and allegations of abuse made against staff
23. Physical intervention and the use of reasonable force
24. Online safety
25. Visitors

26. Work experience and private fostering

Appendices

Appendix I: Additional advice and support for parents, students, and staff

Safeguarding Legislation and statutory guidance

This policy is based on the statutory guidance [Keeping Children Safe in Education \(September 2023\)](#). The following legislation and guidance has also been considered when writing this policy:

[Working Together to Safeguard Children Dec 2023](#)

[Sexual Offences Act \(2003\)](#)

[Hertfordshire Safeguarding Children Partnership Procedures Manual](#) (Electronic)

[The Human Rights Act 1998](#)

[Equality Act 2010](#)

[Searching, screening & Confiscation guidance](#)

[The Children Act, 1989 & 2004 amendment](#)

[Children and Social Work Act 2017](#)

[Disqualification under the Childcare Act \(2006\)\(as amended, 2018\)](#)

[The Prevent Duty, August 2015](#)

[Prevent Duty Guidance, April 2023](#)

[Statutory Guidance on FGM, July 2020](#)

[Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 and the Regulated activity in relation to children: scope](#)

[‘What to do if you are worried a child is being abused’ \(March 2015\)](#)

[Children Missing in Education, September 2016](#)

[The School Staffing \(England\) Regulations 2009](#)

[Sexual violence and sexual harassment between children in schools and colleges 2021](#)

[Promoting and supporting mental health and wellbeing in schools and colleges 2022](#)

[London Child Protection Procedures & Practice Guidance](#)

St Albans Independent College Safeguarding Team

Name	Role	Email
Nicky Logan	Assistant Head teacher - DSL	nlogan@stalbanscollege.co.uk Ext 3004
Assim Jemal	Head Teacher - DDSL	ajemal@stalbanscollege.co.uk Ext 3002
Deena Buckley	Student Support - DDSL	dbuckley@stalbanscollege.co.uk Ext 3005
Sarah Barker	Safeguarding & Welfare Officer - DDSL	sbarker@stalbanscollege.co.uk Ext 3006
Dawn Forster	Teaching Support - Mental Health First Aider	dforster@stalbanscollege.co.uk
Louise Archer	Science Teacher - Mental Health First Aider	larcher@stalbanscollege.co.uk
Steve Pechey	Assistant Headteacher -Mental Health First Aider	spechey@stalbanscollege.co.uk
Emma Hargreaves	English Teacher - Mental Health First Aider	ehargreaves@stalbanscollege.co.uk
Adria Meserve	Art Teacher - Mental Health First Aider	ameserve@stalbanscollege.co.uk
Sam Rogers	Psychology Teacher - Mental Health First Aider	srogers@stalbanscollege.co.uk
Sarah Kerr	Chemistry Teacher - Mental Health First Aider	skerr@stalbanscollege.co.uk

Contact details

If you have a safeguarding query or concern, please email
safeguarding@stalbanscollege.co.uk

Please ensure that you leave your name, contact details and the name of the student who you are the parent/carer of.

If you wish to contact one of the Headteachers please do so via

ajemal@stalbanscollege.co.uk - Assim Jemal

ecotena@stalbanscollege.co.uk - Elvis Cotena

Hertfordshire Safeguarding Children Partnership Procedures

The school follows the procedures established by the Hertfordshire Safeguarding Children Partnership (HSCP); a guide to procedures and practises for all agencies in Hertfordshire working with children and their families.

<https://hertsscb.proceduresonline.com/index.htm>

Key Local Contacts for safeguarding children

Hertfordshire Children's Services	0300 123 4043 contact@hertfordshire.gov.uk
Families First Hertfordshire	www.hertfordshire.gov.uk/familiesfirst
Police	101 or for immediate emergency 999
Department Of Education	Non Emergency Number 0207 340 7264
OFSTED - Safeguarding students	0300 123 4666 (Monday - Friday 8am - 6pm) whistleblowing@ofsted.gov.uk
FGM - Mandatory reporting	Police on 101
Local Authority Designated Officer for allegations against staff (LADO) Kassiane Papageorgiou	kassiane.papageorgiou@hertfordshire.gov.uk 01992 556 979
Prevent Programme Manager	sophie.lawrance@hertfordshire.gov.uk 07773 094 897
Herts Prevent	prevent@herts.pnn.police.uk
NSPCC	0808 800 5000
Childline	0800 1111
Government whistle-blowing service via NSPCC report line	0800 028 0285

1. Introduction

St Albans Independent College is fully committed to meet its responsibility to protect and safeguard the welfare of children and young people, which includes all students under the age of 18 years old in its care.

We recognise the important part we have to play in identifying children at risk of abuse and neglect and in securing appropriate support for them and their families.

St Albans Independent college aims to ensure that all students are treated with respect and dignity, are taught to treat each other with respect, feel safe, have a voice, and are listened to. We actively promote the welfare of all students and expect that all staff, visitors and volunteers are committed to protecting and preventing our students from harm. All staff believe that our college should provide a caring, positive, safe and stimulating environment which promotes the social, physical and moral development of the individual child. We ensure that students know how to keep themselves and others safe through our stay safe curriculum which is taught throughout the curriculum.

This policy should be read in conjunction with the following policies:

- Anti Bullying policy
- Behaviour Policy
- Attendance & Punctuality policy
- Physical Intervention Policy
- Data protection policy
- LAC policy
- Equality and diversity policy
- Health and safety policy
- Online safety policy
- Relationship and Sex education procedure policy
- Safer recruitment policy
- SEND policy
- Whistleblowing policy

It is important that all members of our community know and understand our safeguarding practices. All staff are required to read this policy, as well as Part one

and Annex B of [KCSIE 2023](#), and sign a declaration stating that they have. The policy will be shared with all parents/carers annually, and a link to the policy can be found on the college's website.

1.1 The aims of this policy are:

- To ensure that appropriate action is taken to safeguard all students and promote student welfare
- To support the child's development in ways that will foster security, confidence and independence.
- To ensure all members of the College staff are aware of their statutory responsibilities with respect to safeguarding children and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of monitoring children known or thought to be at risk of harm and to ensure that appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- To emphasise the need for good levels of communication between all members of staff who are properly trained and regularly reminded of how to recognise and report safeguarding issues using a structured procedure which is followed by all members of the school community where abuse is suspected.
- To continue to promote effective working relationships with other agencies, especially the Police and Children's Social Services and those who provide early help support to families in need.
- To ensure that all adults within our school community who have contact with children have been checked as to their suitability as part of the recruitment and selection process, including visitors.

2. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. All staff are particularly alert to the potential need for early help for a child who:

- Are LAC or previously LAC
- Is a privately fostered child
- Has special educational needs or disabilities
- Has experienced challenges during Covid-19 pandemic
- Is a young carer

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Is showing signs of mental health problems as this can in some cases be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups
- Has recently been bereaved
- Is post 16 and homeless
- Is misusing drugs or alcohol
- Has English as an additional language
- Is known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Is at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Is an asylum seeker

Has a parent sent to prison. The National Information Centre of Children of Offenders (NICCO): <https://www.nicco.org.uk/> provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

3. Definitions

For the purpose of this policy a child is considered to be anyone under the age of 18.

Safeguarding and promoting the welfare of children is defined in [KCSIE 2023](#) as:

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

Contextual Safeguarding is an approach to understanding, and responding to children's experiences of significant harm beyond their family and home. This approach recognises the different relationships children have in their schools, peer groups, online and in their community. Parents and carers may have little influence

over these contexts and children's exposure to extra-familial abuse can negatively impact a parent-child relationship.

Child protection describes the things which all members of our community do to prevent students from, or being likely to suffer, harm.

Abuse is a form of maltreatment of a child. This includes inflicting harm by failing to act to protect it. The main areas of abuse are **physical, emotional and sexual**. Further explanation of the different types of abuse can be found in section 6 of this policy.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Early help is support given to a child, young person or family when a problem first emerges. It can be provided at any stage in a child or young person's life.

Children who may require early help (known as Families First in Hertfordshire) Families First is Hertfordshire's strategy for early help for families. A directory of early help services is available at www.hertfordshire.gov.uk/familiesfirst which will help practitioners and families find information and support to prevent escalation of needs and crisis.

Children in need is a term which is used to describe a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired without the provision of services; or a child who is disabled.

Child-on-child abuse describes various behaviours between children that are abusive in nature. Further information can be found in section 12 of this policy.

Child Sexual Exploitation (CSE) is a form of abuse that occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual activity.

Child Criminal Exploitation (CCE) is a form of abuse that occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal activity.

4. Roles and responsibilities

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action.

4.1. All staff

All staff will:

- read and understand part 1 and Annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education 2023, and review this guidance at least annually as part of the school's annual safeguarding training.
- be aware of, and be familiar with, the college's safeguarding policy, the Staff Code of Conduct, the Ignatian Code of Conduct, the school safeguarding team and the procedure for reporting a safeguarding concern.
- know how to respond to a student who discloses abuse.
- have registered and logged into CPOMs. They will be familiar with the system and know how to use it to record a concern.
- Identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. They should be prepared to identify children who may benefit from early help and act immediately to report any concerns which they have regarding a child's welfare.
- know what early help is and what their role in the process is, including identifying problems, working with the DSL, and sharing information with other professionals.
- know how to make a referral to the local authority children's social care.
- know the specific procedure for reporting FGM and radicalisation.
- know the different signs of abuse and neglect and be vigilant to them.
- provide a safe environment in which children can learn.
- Understand the importance of online safety, and know that the DSL is responsible for filtering and monitoring.

4.2. The Designated Safeguarding Lead

The Designated Safeguarding Lead is Mrs Nicky Logan. She is Assistant Headteacher & head of SENCo.

The DSL follows the job description as detailed in Annex C of KCSIE 2023. The full description of the DSLs role can be found in Appendix 3.

The DSL will:

- ensure that the relevant policies are current, known and used appropriately.
- take responsibility for all Safeguarding and child protection issues within the school.
- be available during school hours for all staff to discuss their safeguarding concerns with. When she is unavailable the Deputy DSL will be available.
- deliver weekly staff safeguarding briefings.
- through appropriate training, knowledge and experience, will liaise with Children's Services, other local safeguarding partners, the Local Authority Designated Officer (LADO) and other agencies where necessary, and make prompt referrals of suspected abuse to Children's Services.
- ensure that the college is represented at Child Protection Conferences and core group meetings and will be responsible for ensuring that all staff members and volunteers are aware of the Safeguarding Policy and the procedure they need to follow.
- participate in the assessment of students' welfare.
- make referrals to the appropriate body.
- keep written records of concerns about a child even if there is no need to make an immediate referral.
- ensure that all such records are kept confidentially and securely and are separate from student records.
- ensure that an indication of further record-keeping is marked on the student records.
- ensure that any student currently the subject of a child protection plan who is absent without explanation for two days is referred to Children's Social Care.
- keep the Headteacher informed of any issues.
- be responsible for ensuring the filtering and monitoring systems in place are appropriate and sufficient.
- where reasonably possible, schools and colleges hold **more than one emergency contact number** for each pupil or student. This goes beyond the legal minimum. It is good practice to give the school or college additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern

4.3. The Deputy designated safeguarding lead (DDSL)

The DDSL's are Deena Buckley, Assim Jemal and Sarah Barker.

The DDSL will:

- support the DSL and deputise for him in her absence.
- be required to complete any of the actions specified for the DSL.
- be responsible for maintaining safeguarding records and ensure that when a student leaves the college their Child protection file is forwarded to the appropriate person within 5 days of being notified of the new place of education.

4.4. The safeguarding team

The safeguarding team will all be trained to the same level as the DSL and DDSL. They will attend inclusion meetings, and may attend core group and strategy meetings, under the supervision of the DSL and DDSL. They are responsible for monitoring students of concern.

safeguarding@stalbanscollege.co.uk

4.5. The Headteacher

The Headteachers have a strategic leadership responsibility for the college's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to this guidance, ensuring policies, procedures and training within the college is effective and comply with the law at all times. The Headteacher is accountable for ensuring the effectiveness of this policy and the college's compliance with it. The Headteacher takes full responsibility for ensuring that the college continues to safeguard and promote the welfare of all students.

The Headteacher will ensure that:

- The Safeguarding Policy is reviewed annually, and has been written in line with the requirements of the relevant legislation and guidance
- A member of the Senior Leadership Team is designated to take the lead responsibility for safeguarding and child protection and that there is an alternate and appropriately trained member of staff identified to deal with any issues in the absence of the DSL
- Procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance

- Appropriate measures are in place to respond to children going missing in education, to identify the risk of abuse and prevent them going missing on further occasions
- Safer recruitment practices are followed in accordance with the requirements of KCSIE, 2023
- The College recognises the importance of sharing information with multi-agency partners, complying with its requirements under the Data Protection Act 2018 and GDPR but ensuring that fears over sharing information do not stand in the way of safeguarding children.
- They make sure that the college has appropriate filtering and monitoring systems in place and will review their effectiveness
- They make sure the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role
- Make sure staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring the curriculum supports effective safeguarding and pupil wellbeing, giving full consideration to statutory guidance
- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy as part of their induction
- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistleblowing procedures
- Ensuring that all staff undertake appropriate safeguarding and child protection training which includes online safety.
- Acting as the 'case manager' when an allegation of abuse is made against another member of staff/volunteer.

4.6. Working with parents and carers

The college will always work in partnership with parents to safeguard and promote the welfare of children and to support them to understand our statutory responsibilities in this area.

When new students join the college, parents/carers will be informed that we have a Safeguarding Policy. A link to our Safeguarding policy will be sent to every parent at

the beginning of each academic year, and they will also be able to access the policy on the school website. Parents will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to Children's Services.

We always seek to work with parents in a collaborative way and one which is positive, open and honest. We endeavour to treat all members of our community, including parents, with respect and dignity. We respect everyone's right to privacy and will not share sensitive information unless we have been given permission, or if it is deemed necessary in order to safeguard a child.

Parents will always be informed of any concerns which we have, with the exception of a situation where we believe that sharing this information may increase the child's risk of harm. A referral to children's services will not be delayed by a lack of parental engagement or agreement and the DSL will always make a referral to Children's Services in those circumstances where it is appropriate to do so.

5. Procedures for reporting and recording a concern

Safeguarding is the responsibility of all members of the community, and not just the safeguarding teams. It is important that all members of staff are continually vigilant and looking out for the signs which may indicate a concern.

Safeguarding concerns will normally arise from one of three areas:

- Observations made of the child
- Information that the child or young person discloses
- Information given by a third-party

It is important that all concerns are recorded and passed on, no matter how small. The college uses CPOMs as a system for logging safeguarding concerns. It is essential that all staff record any concerns using this system, no matter how small they may be.

5.1. Reporting and recording concerns where a student is in immediate danger

Where there is a concern that a student is already suffering or, at risk of imminent harm, a member of staff should inform the DSL or DDSL immediately and without delay. This should happen in person, and may require the member of staff to ask someone to cover their lesson so that they can inform the appropriate staff member.

Where a student discloses information pertaining to a crime or serious safeguarding concern, the member of staff should inform the DSL or DDSL immediately.

Once the DSL or DDSL has been informed a written record of the disclosure should be made on CPOMs. Any record of the students' words should be as accurate a

reflection as possible and should not contain any assumptions or embellishments from the staff member.

On receiving the information, the DSL or DDSL will make a decision on what action is required. This may include a referral to children's social care/police.

In the case of any serious disclosure, the DSL or DDSL will phone the Multi Agency Safeguarding Hub to gain guidance.

5.2. Reporting and recording concerns where a student is not in immediate danger

Where a staff member has a concern but does not believe that the student is in immediate danger they should record the concern on CPOMs. This record should include the date and time of the concern, who was present and a clear description of what caused the concern. The member of staff should follow this written record with a conversation with a member of the safeguarding team as soon as possible.

Staff should use CPOMs to record concerns regarding attendance, changes in appearance or mood, mental health, bullying, or anything else which may be a welfare or child protection concern.

5.3. If a child makes a disclosure to you

When a child makes a disclosure, you should pay full attention to the child and ensure that they feel comfortable, not judged and believed. If appropriate you may choose to take notes, but please ensure that a full account of the disclosure is recorded on CPOMs as soon as possible after the disclosure.

If a child discloses a safeguarding issue to you, you should:

- Ensure that you are in a location that is quiet, comfortable and private. No other students should be present.
- Do not promise confidentiality.
- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Do not make any judgements on what has been said.
- Do not interrogate them and do not use leading questions. Try to limit questions to ones which provide you with the what, when, where, and who.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner. Make them feel reassured.

- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret but reassure the child that only certain people who need to know will be informed.

Once the disclosure has happened it may not be appropriate for the student to return to lessons. Examples of when this would be the case are when the disclosure relates to a crime, abuse, or if the student is in a state of upset or distress. In this situation they should be taken to a place where they can feel safe and be supervised.

Act on your concern immediately and speak to Mrs Nicky Logan (DSL) or another member of the Child Protection Team in his absence.

Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. Record this on CPOMs. Scan any written notes which you have made and save them on CPOMs. The original copy should be treated with confidentiality and passed on to the DSL or DDSL as soon as possible.

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

If the disclosure is an allegation against a member of staff, it should be brought directly to the Headteacher. If the disclosure makes an allegation against the Headteacher it should be brought to the LADO.

5.4. Monitoring concerns

CPOMs is monitored by the DSL and DDSL throughout the school day.

Serious safeguarding concerns will be dealt with by the DSL or DDSL.

Where a concern is considered to be low threshold it will be assigned to the Mentor for that student.

Following a concern, the DSL and DDSL will discuss what actions should be taken. These may include:

- Managing support for the child internally using the college's mentor support systems.
- Undertaking an early help assessment (see below)
- Making a referral to statutory services.

Decisions on when to make a referral will be taken by the DSL and DDSL.

If a member of staff believes that their concern has not been dealt with appropriately by the safeguarding team they should speak with the Headteacher.

Staff who continue to feel that appropriate action has not been taken should make a referral to the MASH themselves by calling 0300 123 4043.

5.5. Early help (Known as Families First in Hertfordshire)

Families First is Hertfordshire's strategy for early help for families. A directory of early help services is available at www.hertfordshire.gov.uk/familiesfirst which will help practitioners and families find information and support to prevent escalation of needs and crisis.

Early help means providing support as early as possible to prevent problems escalating and causing distress. The approach requires us to change culture from an often-late reaction and refocusing our response along with our resources on the root causes of problems. By doing so, outcomes for children, young people, families and vulnerable adults improve and costly statutory interventions are avoided.

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

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

Before an early help assessment, the family will be contacted and parental consent will be requested.

5.6. Statutory children's social care assessments and services

A referral to the local authority children's social care and/or the police will always happen where there is a concern that a child is suffering, or is likely to suffer from harm.

The type of referral made will be decided upon by the DSL or DDSL using the https://hertsscb.proceduresonline.com/pdfs/meeting_needs.pdf. Where additional guidance is needed, either the DSL or DDSL may phone the MASH to gain further support.

If a member of staff who is not the DSL or DDSL makes a referral to the MASH, they must inform the DSL as a matter of urgency.

[Hertfordshire Childrens Services](#) will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the

referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

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

A referral can be made online by using the form on the [Herfordshire Childrens services](#), or by phoning the MASH on 0300 123 4043.

6. Recognising abuse

It is of vital importance that all staff are aware of the indicators of abuse and neglect, including exploitation, so that they are able to identify cases of children who may be in need of help and protection, as early as possible.

6.1 Abuse

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Abuse can take several different forms. Below is a description of each type:

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.

The following may be signs of physical abuse:

- Bruises.
- Swelling.
- Scarring.
- Burns or scalds.
- Broken bones.
- Fractures.
- Bite marks
- Untreated injuries
- Repeated or multiple injuries

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 the child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

The following may be signs of emotional abuse:

- Younger children being overly affectionate or clingy towards strangers.
- Lacking confidence and being anxious.
- Struggling to control emotions.
- Lacking social skills.
- Having few friendships.
- Appearing to have a negative relationship with parent or carer.
- Seeming isolated from their parents or carer.
- Being aggressive and cruel to other children and towards animals.
- Using language inappropriate for their age.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of 18 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 and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

The following may be signs of sexual abuse:

- Promiscuity at a young age.
- The use of sexual language is inappropriate for their age.
- Knowledge of sexual information that you wouldn't expect.
- Sexually transmitted infections.
- Pregnancy.
- Trauma.
- Avoiding being alone with certain people like family members or family friends.
- Appearing afraid to socialise or interact with a certain person.

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

The following may be signs of neglect:

- Appearing hungry as though they may have gone without breakfast.
- Turning up to school without lunch or money for food.
- Repeated injuries caused by lack of supervision.
- Skin sores, rashes, flea bites, scabies or ringworm.
- A thin or swollen tummy.
- Having poor hygiene, being visibly dirty or smelling.
- Being without adequate clothing.
- Being tired.
- Having poor language or communication skills.
- Being anaemic.
- Not meeting developmental milestones.
- Appearing to care for family members.
- Being unsupervised.
- Living in an unsuitable home environment.
- Untreated medical problems

In addition to the different types of abuse, all staff must also be aware of the following safeguarding issues identified in Annex B of KCSIE 2023:

- Child abduction and community safety incidents
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
- County Lines
- Children and the court system
- Children absent from education
- Children with family members in prison
- Cybercrime
- Domestic abuse
- Homelessness
- Mental Health
- Modern slavery and the national referral mechanism
- Preventing radicalisation- The Prevent duty, Channel.
- Sexual violence and sexual harassment between children in schools and colleges
- Serious violence
- So-called 'honour' based abuse- FGM and forced marriage

7. Recognising and reporting FGM concerns

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

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

Any teacher who discovers that an act of FGM appears to have been carried out, on a student under 18, must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

The member of staff will also inform the DSL and discuss the case with them (the DSL will involve children's social care as appropriate), and record their actions on CPOMs.

The duty for teachers mentioned above does not apply in cases where a student is at risk of FGM or FGM is suspected but is not known to have been carried out. In this case the staff member will use the college's normal reporting procedure detailed earlier in this policy.

A concern in this area may come from:

being informed by a girl under 18 that an act of FGM has been carried out on her

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

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

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

<https://new.enfield.gov.uk/safeguardingenfield/wp-content/uploads/2020/08/Female-GenitalMutilation-FGM-of-Children-Young-People.pdf>

Staff will not examine students for FGM under any circumstances

8. Reporting radicalisation concerns

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is a part of the schools safeguarding approach.

Below is a brief outline of that approach, as well as some key definitions.

Where there is a concern that a child or young person is in immediate danger the member of staff should not delay in reporting this concern to the DSL or DDSL. They should do this following the procedure explained at point 5.1 of this policy. If the concern does not involve immediate danger they should report it using the procedure explained at point 5.2

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

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

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

Where a referral for radicalization is made by the school, this will be done by emailing sophie.lawrance@hertfordshire.gov.uk or calling 07773 094 897 or emailing the police prevent@herts.pnn.police.uk and usually the police will also be contacted.

In such situations it is likely that the referral may be passed to a multi-agency Channel panel which will discuss the student and their vulnerability to being drawn into terrorism. The school will work closely with the MASH if this is the case.

If a concern is considered extremely urgent it may be appropriate to call 999.

Below are some useful contacts for members of the school community who would like to discuss or raise concerns with the DFE:

- DFE counter extremism helpline: 020 7340 7264
- DFE counter extremism email address: counter.extremism@education.gov.uk

9. Recognising Mental health concerns

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education. The Mental Health First Aiders (MHFA) and DSL has a key role to play in promoting an open and caring environment, and raising awareness of mental health issues and preventative strategies within the college.

All staff:

- should be aware of mental health issues
- understand that adverse childhood experiences or other forms of trauma may lead to mental health difficulties
- where possible should take a trauma informed approach when dealing with students
- should understand that whilst they are well placed to identify mental health concerns, they are not trained professionals and should refrain from making a diagnosis

As a college we recognise that we have an important role to play in supporting the mental health and wellbeing of all students, and this can be achieved by developing approaches tailored to the particular needs of our students. The school follows the guidance described in '[Mental health and behaviour in schools](#)' (2018).

Early intervention to identify issues and provide effective support is crucial. The college's role in supporting and promoting mental health and wellbeing can be summarised as:

- **Prevention:** creating a safe and calm environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping students to be resilient so that they can manage the normal stress of life effectively. This will include teaching students about mental wellbeing through the curriculum and reinforcing this teaching through college activities and ethos;
- **Identification:** recognising emerging issues as early and accurately as possible;
- **Early support:** helping pupils to access evidence based early support and interventions; and
- **Access to specialist support:** working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

Where a potential mental health need has been identified in a student, the DSL or DDSL will take one or some of the following actions:

- Contact parents/carers and arrange a meeting to discuss concerns
- Meet with key staff members e.g. Mentors, a Mental Health First Aider, the SENCO to discuss what support would be most appropriate
- Consult the college SENCo, and possibly refer for assessment
- Refer to CAHMs
- Make a referral to the MASH

9.1. Suicide prevention

Where a student has disclosed that they have had suicidal thoughts the college will take the following actions:

- ❖ An initial conversation to establish whether the student is currently feeling suicidal or has done in the past
- ❖ Where a student confirms that they are feeling suicidal
- ❖ the MASH will be called. The CAHMS crisis line may also be called (0800 151 0023).

- ❖ Parents will be contacted and asked to bring their child to A&E. If this is not possible an ambulance will be called and the student will be accompanied to A&E by a member of the school staff.
- ❖ A call will be placed to the family later that day to enquire to the outcome of the hospital visit.
- ❖ A meeting with parents/carers will be arrange over the next few days to agree next steps and what additional measures need to be put in place by the school to ensure the students continued safety.
- ❖ Separately, key staff will meet to discuss what support strategies should be put in place.
- ❖ A member of staff will be identified as the person to monitor, and be a support worker for, the student.
- ❖ The assigned member of staff will give regular updates to the DSL and DDSL regarding the wellbeing and progress of the student.
- ❖ Parental meetings will happen at frequent intervals to ensure that we are working collaboratively.

Where a student confirms that they are not currently feeling suicidal:

- ❖ If the child can return to lessons they will be encouraged to, if they cannot parents will be asked to take the student home.
- ❖ Parents are called to inform them of the concern and arrange a meeting to discuss next steps.
- ❖ Separately, key staff will meet to discuss what support strategies should be put in place.
- ❖ a referral to CAHMs should be made in collaboration with the parents/carer
- ❖ A referral to other internal/external specialists may be made e.g. the school's EP, the psychotherapist.
- ❖ A key worker is identified who will monitor the student and meet with them regularly.

[Papyrus Suicide Safety Plan](#)

[zero suicide alliance suicide awareness training](#)

9.2 Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship

abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. See Appendix 4 for information regarding Operation Encompass.

10. Recognising Child Criminal exploitation

Child Criminal Exploitation (CCE) is a form of abuse that occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal activity. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

There are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of child criminal exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

County lines is a form of CCE. County lines describe the practice of gangs using dedicated mobile phone lines to sell drugs. As part of this process children are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children may be recruited in school, outside of school, and online using social media. As well as the indicators for CCE listed above, additional indicators that a child may be involved in county lines include:

- Going missing and subsequently being found in areas away from their home
- being the victim or perpetrator of serious violence
- Involvement in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- Being exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection
- Being found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity
- Owing a ‘debt bond’ to their exploiters
- Having their bank account used to facilitate a drug deal.

If you have a concern related to CCE please speak to a member of the safeguarding team as a matter of urgency.

If you wish to find out further information regarding county lines, please discuss this with Miss Sarah Barker, who is a member of the safeguarding team and a county lines specialist.

11. Recognising Child Sexual exploitation

Child Sexual Exploitation (CSE) is a form of abuse that occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual activity.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of child sexual exploitation, where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and

- regularly miss school or education or do not take part in education.
- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond
- expected sexual development or become pregnant.

If you have a concern related to CCE please speak to a member of the safeguarding team as a matter of urgency.

Also refer to Schools Toolkit the characteristics of young peoples' vulnerability to CSE and CCE on the HGFL:

<https://thegrid.org.uk/safeguarding-and-child-protection/childprotection/specific-safeguarding-issues/child-sexual-and-criminal-exploitation>

12. Child-on-Child abuse

Child-on-child abuse describes various behaviours between children that are abusive in nature. All staff recognise that children are capable of abusing their peers, and that this abuse can happen in and outside of school, and online.

St Albans Independent college has a zero-tolerance approach to sexual violence and sexual harassment, and abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

All staff are vigilant to the signs of child on child abuse, and recognize that information may come from various sources such as overheard conversations and observation of changes in behaviour, rather than just through a disclosure. Further, staff are clear in their understanding of the scale of child-on-child abuse and that if there are no reports it does not mean it is not happening, but that it may not be being reported.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise
- causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

12.1. Child-on-Child sexual violence and sexual harassment

Sexual violence and harassment are both forms of child on child abuse. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable.

As a school we will ensure that:

- There is a zero-tolerance approach to sexual violence and sexual harassment, and that any allegations are always taken seriously
- We start from a position of assuming that it is happening within our community, even if there are no reports
- We challenge all physical behaviour that may be sexual in nature, including grabbing the bottom, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts.
- All colleagues understand that it is more likely to be girls who will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

- All colleagues are aware that children with special educational needs and disabilities are three times more likely to be abused than their peers.
- All victims are reassured that they are being taken seriously and that they will be supported and kept safe.
- We recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

12.2. Responding to reports and concerns of child on child sexual abuse, violence and sexual harassment

The college's response to reports of sexual violence and harassment follows the guidance laid out in [part five and Annex B of KCSIE 2023](#).

All staff will maintain an attitude of '**it could happen here**' regarding all safeguarding issues, and especially child-on child abuse.

Most cases of students hurting other students will be dealt with under our school's behaviour policy, but this safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

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

Immediate response

Children may not find it easy to tell staff about their abuse. They may act in a way that they hope will cause you to notice and react. In other situations, reports may come from a friend of the victim. If a student makes an allegation of abuse against another student all staff must:

- if possible, manage reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy)

- ensure the careful management and handling of reports that include an online element. Including being aware of searching screening and confiscation advice (for schools) and [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#). The key consideration is for staff not to view or forward illegal images of a child
- In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection
- not promise confidentiality at the initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead (or deputy) or local authority children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to
- recognise that a child is likely to disclose to someone they trust: this could be anyone on the college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child
- recognise that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse
- keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation
- listen carefully to the child, reflecting back, using the child's language, being nonjudgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was
- consider the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made.

- only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. The college is aware that notes of such reports could become part of a statutory assessment by local authority children's social care and/or part of a criminal investigation, and
- tell Mrs Nicky Logan (DSL) or in her absence Miss Sarah Barker (DDSL) without delay and record the allegation, but do not investigate it.

The DSL will:

- contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
- contact the children and adolescent mental health services (CAMHS), if appropriate.

12.3. Sharing of nudes and semi-nudes ('sexting')

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

Staff must *not*:

- View, copy, print, share, store or save the imagery, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

12.4. Confidentiality following a report of child-on-child abuse

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.

The school will only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. In such a situation the DSL will make a decision after consider the following:

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

Ultimately, the designated safeguarding lead (or a deputy) will balance the victim's wishes against their duty to protect the victim and other children.

If the designated safeguarding lead (or a deputy) decides to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this will be handled extremely carefully, the reasons will be explained to the victim and appropriate specialist support will be offered.

12.5. Risk Assessment

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs assessment will consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s); and

- all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harm.
- The time and location of the incident, and any action required to make the location safer.

Risk assessments will be recorded using the school's pro-forma and then uploaded to CPOMS. The risk assessment will be kept under review. The college will actively consider the risks posed to all students and put adequate measures in place to protect them and keep them safe.

The designated safeguarding lead (or a deputy) will ensure they are engaging with local authority children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The college risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the college approach to supporting and protecting our students and updating our own risk assessment.

12.6. Action following a report of sexual violence and/or sexual harassment

What to consider:

As set out above, sexual violence and sexual abuse can happen anywhere, and all staff are advised to maintain an attitude of '**it could happen here**'.

The college will be aware of and respond appropriately to all reports and concerns about sexual violence/harassment both online and offline, and in and outside of school.

The designated safeguarding lead (or deputy) will have a complete safeguarding picture and is the most appropriate person to advise on the school's initial response.

Important considerations will include:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children.
- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB (harmful sexual behaviour) has been displayed.

- The ages of the children involved.
- The developmental stages of the children involved.
- Any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature).
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers.
- Are there ongoing risks to the victim, other children, adult students or school or college staff; and,
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, schools and colleges should follow general safeguarding principles as set out throughout this guidance. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

Options to manage the report

- The school will manage every report on a case-by-case basis
- The decision of when to inform the alleged perpetrator(s) will be carefully considered.
- When a report is going to be made to children's social care and/or the police, then, as a general rule, the school will speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and will not stop the school taking immediate action to safeguard their children, where required.

There are four likely scenarios for colleges to consider when managing any reports of sexual violence and/or sexual harassment. The four scenarios are:

1. Manage internally

- In some cases of sexual harassment, for example, one-off incidents, the school may take the view that the children concerned are not in need of early help or that referrals to statutory services are not required, and that it would

be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.

- Whatever the response, it will be underpinned by the principle that there is a zerotolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated in St Ignatius College.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

2. Early help

- the school may decide that the children involved do not require referral to statutory services but may benefit from early help.
- Multi-agency early help will work best when placed alongside strong school policies, preventative education and engagement with parents and carers.

3. Referral to children's social care:

- Where a child has been harmed, is at risk of harm, or is in immediate danger, the school will make a referral to local children's social care.
- At the point of referral to children's social care, the school will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision will be made with the support of children's social care.
- If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.
- Where statutory assessments are appropriate, the school (especially the designated safeguarding lead or a deputy) will be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.
- The school will not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children in the school. It will be important for the designated safeguarding lead (or a deputy) to work closely with children's social care (and other agencies as required) to ensure any actions the school takes do not jeopardise a statutory investigation. The risk assessment process will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other

children directly involved in the safeguarding report and all children at the school or college will be immediate.

- In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The school (generally led by the designated safeguarding lead or a deputy) will be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the designated safeguarding lead (or a deputy) will consider other support mechanisms such as early help, specialist support and pastoral support.
- Whatever the response, it will be under-pinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions will be recorded (written or electronic).

4. Reporting to the police

Any report to the police will generally be in parallel with a referral to local authority children's social care (as above).

- It is important that the designated safeguarding lead (and their deputies) are clear about the local process for referrals and follow that process.
- Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. The following advice may help schools and colleges decide when to engage the Police and what to expect of them when they do: When to call the police.
- When a report has been made to the police, the school will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.
- At this stage the school will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school is supporting the child in any decision they take. This will be with the support of local authority children's social care and any appropriate specialist agencies.

- In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, the school will continue to engage with specialist support for the victim and alleged perpetrator(s) as required.
- Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the designated safeguarding lead (or a 32 deputy) to work closely with the police (and other agencies as required), to ensure any actions the school takes do not jeopardise the police investigation.
- Whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

The school will follow the guidance in KCSIE with regards to:

- considering bail conditions
- managing any delays in the criminal process
- the end of the criminal process
- unsubstantiated, unfounded, false or malicious reports
- ongoing response.

12.7. Creating a supportive environment in school and minimising the risk of Student-on student abuse

St Albans Independent College recognises the importance of taking proactive action to minimise the risk of student-on-student abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent

- Ensure pupils are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously

Ensure staff are trained to understand:

- How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
- That even if there are no reports of peer-on-peer abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
- That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

13. Serious Violence

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

- A change in friendships or relationships with older individuals or groups
- A significant decline in performance
- Signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries

- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Risk factors for involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded
- Having experienced child maltreatment and having been involved in offending, such as theft or robbery.

More information, including a more extensive list of risk factors can be found in the home office's [serious violence strategy](#).

The college recognizes that those who are at risk of, or involved in, county lines are also more likely to be involved in serious violence, and many of the indicators are the same.

It is clear that violence can often peak in the hours just before or after school. As a response to this staff conduct duties before and after school. We also offer a breakfast club before school and an enrichment programme after school. Students who are identified as being at risk of serious violence and CCE are recommended to attend these clubs in order to protect them from the increased risk during these periods.

14. Looked-after and previously looked-after children

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

Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.

The DSL has details of children's social workers and relevant virtual school heads

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

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

As part of their role, the designated teacher will:

Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.

Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

15. Students with a social worker

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

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

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

Responding to unauthorised absence or missing education where there are known safeguarding risks.

The provision of pastoral and/or academic support.

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

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

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

Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils.

The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.

Communication barriers and difficulties in managing or reporting these challenges.

We offer extra pastoral support for these students.

17. Children absent from education

All children, regardless of their circumstances, are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, child sexual exploitation or radicalisation, and becoming NEET (not in education, employment, or training) later in life.

Department for Education guidance makes it clear that in carrying out this duty, local authorities must have in place arrangements for joint working and information sharing with other local authorities and partner agencies. It also states that all agencies which come into contact with children must cooperate with the local authority's arrangements for identifying children thought to be missing from education.

Separate guidance is available for schools & colleges on Herts Grid for Learning, about the legitimate removal of pupils from a school roll. A child legitimately removed from roll is not in most cases missing from education and all schools, including academies and independent schools are legally required to notify the local authority when they remove/plan to remove a child from their roll.

Children absent from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation- particularly county lines. It is important the school response to children absent from education identifies such abuse and helps prevent the risk of them going missing in the future.

The college follows the statutory guidance detailed in the DFE document [Children Missing Education](#). We understand that it is our responsibility:

- to enter students on the admission register at the beginning of the first day on which the college has agreed, or been notified, that the student will attend the college. If a student fails to attend on the agreed or notified date, the college should undertake reasonable enquiries to establish the child's whereabouts and consider notifying the local authority at the earliest opportunity.
- To monitor student's attendance through their daily register. Schools should agree with their local authority the intervals at which they will inform local authorities of the details of students who fail to attend regularly, or have missed ten school days or more without permission. Schools should monitor attendance closely and address poor or irregular attendance. It is important that pupils' poor attendance is referred to the local authority.

- That where a pupil has not returned to school for ten days after an authorised absence or is absent from school without authorisation for twenty consecutive school days, the pupil can be removed from the admission register when the school and the local authority have failed, after jointly making reasonable enquiries, to establish the whereabouts of the child. This only applies if the school does not have reasonable grounds to believe that the pupil is unable to attend because of sickness or unavoidable cause.
- To arrange full-time education for excluded pupils from the sixth school day of a fixed period exclusion. This information can be found in the [Exclusion from maintained schools, academies and pupil referral units in England statutory guidance](#).
- And safeguarding duty in respect of our students, and as part of this should investigate any unexplained absences.

Further information on the college's response to children absent from education, as well as our strategy for dealing with poor attendance can be found in the college's attendance policy.

18. Elective home education

Whilst we wish all students to remain at St Albans Independent College, we also recognize and respect the decision that a parent may take to electively home educate their child.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we will work collaboratively with the LA and other key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable.

When a parent/carer decides to go ahead with home educating their child the attendance officer will inform the LA of all deletions from the admission register once the child is taken off roll.

19. Record keeping

- The college uses CPOMs as a place for staff to record any safeguarding concerns which they have. CPOMs is also used to record all discussions, actions and decisions made in relation to a student.
- Any files which we receive as a hard copy will be kept in a locked cabinet, and a record that they have been received will be made on CPOMs. The record will also summarise any serious concerns in that file.

- Safeguarding records will be kept for all students for 7 years.
- When a student who has a CP file moves to a new school the DDSL will send the file to the new school within 5 working days of the school being notified of the new place of education.
- When it is deemed appropriate, and usually due to significant concerns, the DSL will also contact their counterpart at the student's new school to provide further information.
- All referrals to external agencies are recorded.
- Separate logs are kept for bullying, racism, and child-on-child abuse.

20. Confidentiality, Data protection, GDPR, and information sharing

We recognise that all matters relating to Child Protection are confidential and are only shared with relevant staff on a 'need to know' basis.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. If staff are unsure of sharing information they should seek guidance from either the DSL or DDSL.

All staff must be aware that they cannot promise a child to keep secrets but will reassure the child that what they have told them will not become public knowledge but will need to be passed on to key people so as to support the child.

As a College we are aware that among other obligations, the [Data Protection Act 2018](#) and the GDPR place duties on us to process personal information fairly and lawfully and to keep the information we hold safe and secure. However, we understand that The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

Where staff need to share 'special category personal data', it is done so knowing that the Data protection act 2018 has 'safeguarding of students and individuals at risk' as a processing condition which enables staff to share information without consent in situations where it is not possible to gain consent, or where it cannot be reasonably expected that a practitioner gains consent, or if gaining consent would place a student at risk.

20.1 Child leaving school

When a child moves to a new school or college any relevant files will be shared with the new place of education within 5 working days of the school receiving confirmation of the new destination.

21. Safeguarding Training for staff

All staff will receive annual safeguarding training as part of the school's INSET programme each September. This training will include:

- Signposting the school's safeguarding team
- The process for dealing with a disclosure and reporting child protection concerns
- An overview of the different types of abuse and the indicators
- An overview of the safeguarding policy, and signposting of any changes
- An overview of the changes to that years KCSIE statutory guidance
- An overview of child on child abuse, CCE, CSE, FGM, mental health and online safety
- Guidance on how staff can safeguard themselves and appropriate conduct

In addition to this training staff will be provided with an electronic copy of KCSIE part 1 and Annex B which they will be required to read. Staff will sign an electronic declaration to confirm that they have read both documents.

Throughout the school year staff will be given regular updates on safeguarding issues and additional, bite sized, safeguarding training during the weekly staff briefing which happens each Monday morning at 8.20am.

Every 3 years all staff will attend a longer safeguarding training which will be delivered by external providers and will be an in depth look at key safeguarding issues.

21.1. Training for the safeguarding team

The DSL and Deputy DSL will receive the following training:

- DSL training every 2 years
- Other relevant training which is available and relevant to the safeguarding issues which the school faces.

The other members of the safeguarding team will receive the following training

- DSL training every 2 years
- Training relevant to their area of specialism. E.g. county lines, domestic violence, mental health.

21.2. Training for new staff who join during the academic year, early career teachers, and those on other forms of teacher training

- All new staff, and those who are completing teacher training will receive safeguarding training on their induction day.
- ECTs will receive safeguarding training as part of their programme.

21.3. Training for supply staff

- Supply staff will be given a copy of the safeguarding leaflet which details the schools key safeguarding procedures, and includes pictures and names of all members of the safeguarding team.
- All agency staff should receive safeguarding training from their agency before they are allowed to work in schools. This is the responsibility of the agency.
- Long term supply staff will also take part in the college's induction process.

21.4. Training for contractors

- Contractors will be given information on the colleges safeguarding procedures on arrival.

21.5. Safer recruitment training

- The school adopts the Hertfordshire safe recruitment policy.
- When an interview takes place there will be at least one member of staff present who has received safer recruitment training.
- All members of SLT will be safer recruitment trained.

22. Whistleblowing and Allegations against staff and Volunteers

Whistleblowing

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

All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues. Staff are trained on this during their annual INSET.

Further details regarding whistle blowing can be found in our whistleblowing policy.

Allegations against staff and volunteers

We understand that a student may make an allegation against a member of staff or volunteer. The college follows the Local Safeguarding Children's Board guidance for managing allegations against staff.

If an allegation is made against a member of staff, including any supply staff or volunteers, the member of staff or volunteer receiving the allegation will immediately

inform the Headteacher. In the absence of the headteacher, staff should speak to the DSL.

If the allegation made concerns the Headteacher, the member of staff must immediately inform the Local Authority Designated Officer (LADO).

Concerns must always be recorded in writing, and in addition may also take place in person.

Where a parent/carers would like to report a safeguarding concern, they should do so by contacting Mrs Nicky Logan (DSL) either:

- By phone- 01727 842 348 ext 3004
- By email- nlogan@stalbanscollege.co.uk

Part four of KCSIE 2023 outlines the two levels of allegation which may be made against a person who works or volunteers in a school:

1. Allegations that may meet the harm threshold.
2. Allegations/concerns that do not meet the harm threshold – referred to for the purposes of this guidance as ‘low-level concerns’.

The Headteacher on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (**LADO**) and take their guidance on whether the allegation does meet the harm threshold or, should be treated as a ‘low-level concern’

Before contacting the LADO the college will conduct a basic inquiry to establish facts. This may include:

- Was the individual in the school at the time of the allegations
- Did the individual, or could the individual have come into contact with the child
- Are there any witnesses

22.1 Allegations that may meet the harm threshold

Those allegations which indicate that a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the school are considered to have met the harm threshold. This applies to anyone working in the school that provides education for children under 18 years of age, including supply teachers, volunteers and contractors.

Allegations which meet the harm threshold may include where a person has:

- behaved in a way that has harmed a child, or may have harmed a child and/or

- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. (This includes behaviour that may have happened outside of the school that might make a person unsuitable to work with children, and is known as transferable risk.) Was there any CCTV footage

Procedure for dealing with allegations which meet the harm threshold

It is important to note that the processes described will apply whether the allegation refers to an incident that took place in school or not.

The college will deal with any allegations of abuse as quickly as possible, and fairly and consistently.

The college will ensure that the student is protected effectively, whilst also supporting the member of staff identified in the allegation.

Where further enquiries are required to enable a decision about how to proceed, the **LADO** and case manager will discuss how and by whom the investigation will be undertaken. The **LADO** will provide advice and guidance to the school when considering allegations against adults working with children. The **LADO**'s role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, local authority children's social care, the school or college, or a combination of these. In straightforward cases, the investigation will normally be undertaken by the DSL and/or headteacher, and will be known as the 'case manager'.

The case manager will take the following steps:

- Meet with the person who is the accused and inform them of the allegations against them, and what the process will be. If the police and/or children's services are involved, the case manager will only share that information which they have been given permission to.
- Make a decision as to whether suspension of the staff member is appropriate. If this is the case a clear record of the rationale for suspension will be recorded and, and an explanation why alternatives to suspension were not considered viable options. The suspension will be confirmed in writing and provided to the subject of the allegations within 1 working day. They will also be given a named contact in school.
- If after investigation the decision is no further action, the outcome of the investigation and the reasoning behind the decision for no further action will be recorded. The decision will be put into writing to the individual involved,

and the person who brought the allegations will also be notified. This notification will also outline the follow up actions which will be taken.

- If further action is required, the case worker will liaise with the DSL to take action within school if appropriate and/or liaise with the other safeguarding partners to respond appropriately.
- Inform the parents/carers that an allegation has been made only once social services and or the police have agreed that this is appropriate. When informing parents/carers the case manager will explain the need to maintain confidentiality whilst the investigation is ongoing.
- Carry out a referral to the DBS if it is thought that the staff member has engaged in conduct that harmed or is likely to harm a student, or if the individual otherwise poses a risk of harm to a student.

The case manager will monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Wherever possible, the first review should take place no later than four weeks after the initial assessment.

Allegations against supply staff

In addition to the steps outlined above, when the allegation is made against someone who is not directly employed by the school the following steps will be taken:

- The headteacher of DSL will contact the agency and discuss the actions which will be taken with the supply teacher. These may include suspension, or redeployment to a different area of the school whilst the investigation is taking place.
- The school will take the lead on the investigation, but will keep the agency involved completely.
- We will ensure that the agency shares the appropriate information so that any previous concerns or allegations are taken into account as part of the investigation.

Allegation outcomes

Following the conclusion of the investigation into the allegation the school will identify the outcome as one of the following:

- Substantiated: there is sufficient evidence to prove the allegation

- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation
- False: there is sufficient evidence to disprove the allegation
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence, or
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Actions following the conclusion of investigation

Depending on the outcome of the allegation the response will vary. Below is an outline of the specific actions following the different outcomes:

Action following a criminal investigation or prosecution

- The LADO will discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or local authority children's social care will also inform that decision. The options will depend on the circumstances of the case and the consideration will take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

Action where an allegation is substantiated

- If the individual is dismissed or resigns, the case manager and/or DSL will make a decision on whether to make a referral to the DBS for consideration of whether they should be included on the barring list.
- The case manager and/or the DSL will make a decision on whether to make a referral to the Teaching Regulation Agency.

Unsubstantiated, unfounded, false or malicious allegations

- If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the case manager will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate.
- If an allegation is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it as per the Ignatian code of conduct.

Returning to work

When it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager will consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager will also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending the school.

Record keeping

Details of allegations following an investigation that are found to have been malicious or false will be removed from personnel records, unless the individual gives their consent for retention of the information. However, for all other allegations, i.e. substantiated, unfounded and unsubstantiated the following information will be kept on the file of the person accused:

- a clear and comprehensive summary of the allegation
- details of how the allegation was followed up and resolved
- a note of any action taken, decisions reached and the outcome i.e. substantiated, unfounded or unsubstantiated
- a copy provided to the person concerned, where agreed by local authority children's social care or the police, and
- a declaration on whether the information will be referred to in any future reference.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

All records will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

References

Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious will not be included in employer references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious will also not be included in any reference.

Substantiated allegations will be included in references, and the information provided will be factual and will not include opinions.

Learning lessons

Throughout the process in handling allegations and at the conclusion of a case in which an allegation is substantiated, the school will review the circumstances of the case to determine whether there are any improvements to be made to the school's procedures to help prevent similar events in the future. This will include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons will also be learnt from the use of suspension when the individual is subsequently reinstated. The school will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated the case manager will consider the facts and determine whether any lessons can be learned and if improvements can be made.

Non recent allegations

Where an adult makes an allegation to the school that they were abused as a child, the individual will be advised to report the allegation to the police. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent 44 allegations. The LADO will coordinate with local authority children social care and the police. Abuse can be reported no matter how long ago it happened.

22.2. Allegations/concerns which do not meet the harm threshold

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

Though a concern may be categorised as 'low level' if it does not meet the harm threshold, it does not mean that the concern can be dismissed as insignificant. Examples of such concerns are:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or

- humiliating pupils.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that all low-level concerns are shared responsibly with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools from becoming the subject of potential false low-level concerns or misunderstandings.

Recording low-level concerns

All low-level concerns will be recorded in writing. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records will be reviewed periodically and when an allegation has been made so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it will be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

22.3. Supporting Staff

We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the designated staff and to seek further support as appropriate.

The DSL and DDSL will have access to professional supervision on a monthly, but also ad hoc basis. This is in acknowledgement of the importance of them maintaining good mental health whilst dealing with potentially distressing cases in college.

23. Physical Intervention and use of reasonable force

Our policy on physical intervention by staff is set out in a separate policy titled 'Use of Reasonable Force and Physical Restraint' and acknowledges that staff must only ever use physical intervention as a last resort, and that at all times it must be the minimal force necessary to prevent injury to another person.

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

24. Online Safety

Our Online Safety policy is a separate document which recognises the need to have strategies to protect children in the digital world. The online safety policy includes further information on how appropriate **filtering and monitoring** technology is used on school devices and the school network. The policy can be found on our website.

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

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of students, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Educate staff on the expectations, applicable roles and responsibilities in relation to filtering and monitoring, during new staff induction and INSET training
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Ensure that all staff are aware that abuse can happen online.

The 4 key categories of risk

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

Content – being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

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

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

Commerce – risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you believe that any member of our community is at risk of becoming a victim of phishing, please report it to the anti phishing workgroup: [\(https://apwg.org/\)](https://apwg.org/).

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

- Educate pupils about online safety as part of our curriculum. For example:
- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so,
- including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety. In addition, we will keep parents/carers updated regarding the systems which you use for remote education, including those systems that are used to deliver content remotely, as well as those used for the filtering and monitoring of online use.
- Make sure parents/carers are aware of who from the college their child is going to be interacting with online, and when this will happen.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones

- Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the DfE's guidance on [searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- **This section summarises our approach to online safety and mobile phone use. For comprehensive details about our college's policy on online safety and the use of mobile phones, please refer to our online safety policy which you can find on our website.**

25. Visitors

The college has different types of visitors on a daily basis including external professionals, those working on the building, and children's relatives and family friends. Each group will be welcomed into our community and then processed in a specific way:

- Sign in at reception
- Those visiting in a professional capacity will have their ID checked and must provide assurance that they have had an appropriate DBS check, or the visitor's employer confirms that the check has taken place.
- Family members who are visiting the school for a reason directly linked to their child will not be asked to provide ID.

For all visitors, the headteacher or a member of the senior team will use their professional judgement about the need to escort or supervise any such visitors.

All members of staff who are expecting a visitor will inform reception with an appropriate amount of notice.

All visitors will be provided with a guide to safeguarding at the college, which identifies who the safeguarding team are.

The college acknowledges that whilst external organisations can provide a varied and useful range of information, resources and speakers that can help schools and colleges enrich children's education, we must still give careful consideration to the suitability of any external organisations who may be invited into the school. This will include an assessment of the appropriateness of the content which will be delivered, and a decision on what checks will be required.

26. Work experience and private fostering

26.1 Work experience

Where the college organises a work experience placement, the college will ensure that the placement provider has policies and procedures in place to protect children from harm. The college will consider the specific circumstances of the placement before deciding if a DBS check is required for the person responsible for the supervision of a child under the age of 16. In particular consideration will be given to the nature of the supervision and the frequency of the activity being supervised. These considerations will include whether the person providing the teaching/training/instruction/supervision to the child on work experience will be:

- unsupervised themselves, and
- providing the teaching/training/instruction frequently (more than three days in a 30 day period, or overnight).

If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity relating to children. If so, the college may ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.

26.2 Private fostering

Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of our staff through the normal course of their interaction, and promotion of learning activities, with children. When the arrangements come to the attention of the college, we will notify the local authority to allow the local authority to check if the arrangement is suitable and safe for the child.

Appendix I: Additional advice and support for parents, students, and staff

Abuse

[Supporting practice in tackling child sexual abuse](#) - CSA Centre of Expertise on Child Sexual Abuse

[What to do if you're worried a child is being abused](#) – DFE advice

[NHS](#)- Help after rape and sexual assault

[Supportline](#)- confidential emotional support for abuse survivors

[Rape Crisis](#) - National charity and the umbrella body for their network of independent member Rape Crisis Centres

[Childline](#) - or call 0800 1111

Bullying

[Preventing bullying including cyber bullying](#) – DfE advice

Anti-bullying Alliance- Anti bullying charity

Drugs

[Information and advice on drugs](#)- talk to frank website

Mental health

[Kooth](#)- an online mental wellbeing community

[Young Minds](#)- mental health charity for young people

[The mix](#) - Free and confidential advice for under 25's

[Anna Freud](#) - Mental health support charity for young people

Online safety

[NSPCC](#) advice on keeping children safe online

[Think you know](#)- Advice from CEOPs on online safety for 11-18 year olds

[Childline](#)- Advice on staying safe online

[Let's Talk About It](#) provides advice for parents and carers to keep children safe from online radicalization

[Parentzone](#) provides help for parents and carers on how to keep their children safe online

Radicalisation

[Prevent duty guidance](#)- Home Office guidance

[Prevent duty: additional advice for schools and childcare providers](#) - DfE advice

[Educate Against Hate website](#) - DfE and Home Office advice

Suicide prevention

[Papyrus](#)- Prevention of young suicide charity

Implementation, Monitoring and Review of the Child Protection Policy

The policy will be reviewed at least annually by the Headteachers and Safeguarding Team. It will be implemented through the college's induction and training programme, and as part of day-to-day practice. Compliance with the policy will be monitored by the DSL and through staff performance measures.

This policy will be reviewed every year

Review by: Mr A Jemal

Date of last review: 5th December 2023 Date of next review: 5th December 2024