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The College Principal is Alistair Brownlow.

This policy is available on the college's website: www.rochester-college.org It is also available in hard copy on request from the office or by email admissions@rochester-college.org.uk

Contents

Safeguarding Statement	4
1.1 Policy context	5
1.2 Definition of safeguarding	5
1.3 Related safeguarding policies	6
1.4 Policy compliance, monitoring and review	7
2 Governance and leadership	7
2.1 Designated Safeguarding Lead (DSL)	8
2.2 Members of staff	9
2.3 Students	9
2.4 Parents/Carers	10
3. Recognising, responding and reporting	10
3.1 Recognising indicators of abuse and neglect	10
3.2 Responding to Child Protection concerns	11
3.3 Recording concerns	13
3.4 Multi-agency working	13
3.5 Confidentiality and information sharing	14
3.6 Complaints	14
4. Specific Safeguarding Issues	15
4.1 Child on child abuse	15
4.2 Child on Child Sexual Violence and Sexual Harassment	17
4.3 Nude and/or semi-nude image sharing by students	18
4.4 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)	19
4.5 Serious Violence	20
4.6 So-called Honour Based Abuse (HBA)	20
4.7 Preventing radicalisation	21
4.9 Cybercrime	21
4.10 Domestic abuse	21
4.11 Mental health	22
5. Supporting students Potentially at Greater Risk of Harm	22
5.1 Safeguarding students with Special Educational Needs or Disabilities (SEND)	22
5.2 Students requiring mental health support	23
5.3 Children Missing from Education (CME)	23
5.4 Students who need a social worker (Child in need and Child Protection plans)	23
5.5 Looked after children, previously looked after children and care Leavers	23
5.6 Students who are Lesbian, Gay, Bi, or Trans (LGBT)	24
6. Online Safety	24
6.1 Policies and procedures	25

6.2 Appropriate filtering and monitoring	25
6.3 Information security and access management	26
6.4 Remote/Online learning	26
6.5 Staff training	26
6.6 Educating students	27
6.7 Working with parents/carers	27
7. Staff awareness, Induction and Training	27
7.1 Safer working practice	28
7.2 Supervision and support	28
8 Safer Recruitment and Allegations Against Staff	29
8.1 Safer recruitment and safeguarding checks	29
8.2 Allegations/concerns raised in relation to staff, including supply teachers, volunteers and contractors	29
8.2.1 Concerns that meet the 'harm threshold'	30
8.2.2 Concerns that do not meet the 'harm threshold'	30
8.3 Safe Culture	31
9 Opportunities to Teach Safeguarding	32
10 Physical Safety	32
10.1 Use of 'reasonable force'	32
10.2 The use of premises by other organisations	32
10.3 Site security	33
Appendix 1: Local Support	33
Appendix 2: Categories of Abuse	34
Appendix 3: Support Organisations	36

Associated RIC Policies

Acceptable use of IT (Students)

Acceptable use of IT (Staff)

Anti-Bullying Policy (Students)

Behaviour and Discipline Policy (Pupils)

Children Missing in Education Policy

Code of Conduct (Staff)

Health, Safety, and Security Policy (Staff)

Lone Working Policy (Staff)

Physical Restraint Policy (Staff)

Safer Recruitment Policy (Staff)

Trips and Visits Policy (Staff)

Whistleblowing Policy (Staff)

Safeguarding Statement

Rochester Independent College is committed to ensuring the welfare and safety of all students. We believe that students have the right to learn in an environment that is safe, caring, inclusive and supportive. This includes being protected from all types of abuse, in both the physical and virtual environments: Online Safety is an important aspect of safeguarding our students. All adults in the college receive appropriate training to recognise when students need additional support and are confident in applying our safeguarding procedures. These support mechanisms and procedures are holistic and cater for boarding students also.

The students are given the opportunity to learn about how to be safe through their curriculum and daily interactions with the adults and peers. Their voice is heard through formal and informal methods and their welfare will always be the most important influence in shaping our college.

Introduction

- RIC is an independent college providing high quality education for mixed genders from the age of 11. The contents of this policy also relates to students boarding at RIC. Boarding students reside from 13 years of age.
- The safeguarding support offered throughout boarding and education are entwined providing a holistic approach; this is always the most effective when providing any level of support to our students.
- RIC recognises our statutory responsibility to safeguard and promote the welfare of all students. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, leaders, parents/carers, families, and students) are an important part of the wider safeguarding system for students and have an essential role to play in making this community safe and secure.
- RIC believes that the best interests of students always come first. All students (children defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all students regardless of age, gender, ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.
- Staff working with students at RIC will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a student, staff will always act in the best interests of the student and will act immediately.
- RIC recognises the importance of providing an ethos and nurturing environment within college that will help students to be safe and to feel safe. In our college students are respected and are encouraged to talk openly. We will ensure students' wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- Our core safeguarding principles are:
 - Prevention: positive, supportive, safe culture, curriculum and pastoral opportunities for students, safer recruitment procedures.
 - Protection: following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
 - Support: for all students, parents/carers and staff, and where appropriate specific interventions are required for those who may be at risk of harm.
 - Collaborating with parents/carers and other agencies: to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- The procedures contained in this policy apply to all staff, including governors, agency staff and volunteers, and are consistent with those outlined within KCSIE 2022.

1.1 Policy context

- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2022 (KCSIE) which requires individual schools and colleges to have an effective Child Protection policy.
- This policy has been developed in accordance with the principles established by the Childrens Act 1989 and 2004 and related guidance. This includes but is not limited to:

- Keeping Children Safe in Education 2022 (KCSIE)
 - Working Together to Safeguard Children 2018 (WTSC)
 - Framework for the Assessment of children in Need and their Families (2000)
 - Medway Safeguarding Children Procedures
 - The Education Act 2002
 - Education and Inspections Act 2006
 - The Education (Independent School Standards) Regulations 2014
 - The Human Rights Act 1998
 - The Equality Act 2010 (including the Public Sector Equality Duty)
 - Boarding Schools NMS 2022: Sexual Violence and Sexual Harassment between children 2021
- Section 175 of the Education Act 2002 requires governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all students who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
 - RIC will continue to follow government guidance in response to the coronavirus (Covid-19) pandemic; regardless of the action required, our safeguarding principles will always remain the same. We will amend this policy and our approaches, as necessary.
 - RIC recognises that as a result of the Covid-19 pandemic, some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases experienced increased welfare and/or safeguarding risks.

1.2 Definition of safeguarding

- In line with KCSIE 2022, safeguarding and promoting the welfare of students is defined for the purposes of this policy as:
 - protecting students from maltreatment
 - preventing impairment of student's mental and physical health or development
 - ensuring that students 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.
- The college acknowledges that safeguarding includes a wide range of specific issues including (but not limited to): Abuse and neglect, bullying, including cyberbullying, child on child abuse, students with family members in prison, children missing education (CME), students missing from home or care, child sexual exploitation (CSE), child criminal exploitation (CCE), contextual safeguarding (risks outside the family home), county lines and gangs, domestic abuse, drugs and alcohol misuse, fabricated or induced illness, faith abuse, gender based abuse and violence against women and girls, homelessness, human trafficking and modern slavery, mental health, nude or semi-nude image sharing (youth produced/involved sexual imagery or "Sexting", online safety, preventing radicalisation and extremism, private fostering, relationship abuse, serious violence, sexual violence and sexual harassment, so-called 'honour-based' abuse (including female genital mutilation (FGM) and forced marriage) and 'upskirting'.

(Also see Part One and Annex B within 'Keeping Children Safe in Education' 2022)

1.3 Policy compliance, monitoring and review

- RIC will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures. All changes will be agreed with the Governing Body who have oversight of Safeguarding and Child Protection procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One and/or Annex A of KCSIE 2022 as appropriate.
- Parents/carers can obtain a copy of the college Safeguarding and Child Protection Policy and other related policies on request. Additionally, they can be viewed via the college website: rochester-college.org
- The Designated Safeguarding Lead will ensure regular reporting on safeguarding and child protection activity and systems to the governing body. The governing body will be provided with a brief summary of an incident/situation but will not receive the personal details or identifying features of families as part of their oversight responsibility. Reporting will include a weekly, termly and annual report. These reports will be sent to both Tim Fish and Paul Ludlow for professional review. Safeguarding is also a standing priority agenda item in each governing body meeting and each RIC SLT meeting.

2 Governance and leadership

- The governing body and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation. The governing body has regard to the KCSIE guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The governing body will facilitate a whole college approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the student at their heart.
- The governing body is aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 and the local multi-agency safeguarding arrangements.
- The governing body and leadership team will ensure that there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote student's welfare.
- the Principal will ensure that our safeguarding and child protection policy and procedures adopted by the governing body, are understood, and followed by all staff.
- The governing body ensure an appropriate senior member of staff, from the leadership team, is appointed to the role of designated safeguarding lead. The DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and students regarding any safeguarding and welfare concerns.
- The college has a nominated governor for safeguarding. They will support the DSL and have oversight in ensuring that the college has an effective policy which interlinks with other

related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.

2.1 Designated Safeguarding Lead (DSL)

- The college has appointed (Kayleigh Simpson, Director of Safeguarding), a member of the senior leadership team, as the Designated Safeguarding Lead (DSL).
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and Child Protection systems (including online safety) in the college. Whilst the activities of the DSL may be delegated to the assistants, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The college has also appointed Assistant DSLs who will have delegated responsibilities and act in the DSL's absence, ADSLs include Kelly Flatman, Helen Rose and Chris Barradell
- The DSL (and any assistants) will be more likely to have a complete safeguarding picture and will be the most appropriate to advise staff on the response to any safeguarding concerns.
- It is the role of the DSL to carry out their functions as identified in Annex C of KCISE 2022. This includes but is not limited to:
 - Acting as the central contact point for all staff to discuss any safeguarding concerns
 - Maintaining a confidential recording system for child protection concerns
 - Coordinating safeguarding action for individual students
 - When supporting students with a social worker or looked after students, the DSL should have the details of the student's social worker and the name of the virtual school head in the authority that looks after the student, with the DSL liaising closely with the designated teacher (Leighton Bright, SENCo).
 - Liaising with other agencies and professionals in line with KCSIE 2022 and WTSC 2018
 - Ensuring that locally established procedures as put in place by the three safeguarding partners and ensuring referrals are followed, as necessary.
 - Representing, or ensuring the college is appropriately represented at multi-agency safeguarding meetings.
 - Managing and monitoring the college role in any multi-agency plan for a student.
 - Being available, at all times, for staff in the college to discuss any safeguarding concerns, this is also applicable to boarding staff members.
 - Helping promote educational outcomes by sharing appropriate information about the students and their personal circumstances.
 - Ensuring adequate and appropriate DSL cover arrangements as necessary.
 - Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
 - Liaising with the Principal to inform them of any safeguarding issues, especially ongoing enquiries under section 47 of the students Act 1989 and police investigations. This includes being aware of the requirement for students to have an Appropriate Adult (PACE Code C 2019).
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Assistant DSLs will be trained to the same standard

as the DSL. Training will be updated formally at least every two years, but knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

2.2 Members of staff

- Our staff play a particularly important role in safeguarding as they are in a position to identify concerns early, provide help for students, promote student's welfare and prevent concerns from escalating
- All members of staff have a responsibility to:
 - provide a safe environment in which students can learn.
 - be aware of the indicators of abuse and neglect so that they can identify cases of students who may need help or protection.
 - know what to do if a student tells them that they are being abused, neglected, or exploited and understand the impact abuse and neglect can have upon a student.
 - be able to identify and act upon indicators that students are, or at risk of developing mental health issues.
 - be prepared to identify students who may benefit from early help.
 - understand the early help process and their role in it.
 - understand the college safeguarding policies and systems.
 - undertake regular and appropriate training which is regularly updated.
 - be aware of the local process of making referrals to Medway Local Authority, including Early Help and statutory assessments under the Children's Act 1989.
 - know how to maintain an appropriate level of confidentiality.
 - reassure students who report concerns that they are being taken seriously and that they will be supported and kept safe.
 - act in line with Teachers' Standards 2012 which state that teachers (including headteachers) should safeguard student's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Staff at RIC recognise that students may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a student.
- Staff at RIC will determine how best to build trusted relationships with students and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies.

2.3 Students

- Students have a right to:
 - Feel safe, be listened to, and have their wishes and feelings taken into account.
 - Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
 - Contribute to the development of college safeguarding policies.
 - Receive help from a trusted adult.
 - Learn how to keep themselves safe, including online.

2.4 Parents/Carers

- Parents/Carers have a responsibility to:
 - Understand and adhere to the relevant college policies and procedures.
 - Talk to their children about safeguarding issues and support the college in their safeguarding approaches.
 - Identify behaviours which could indicate that their child is at risk of harm including online.
 - Seek help and support from the college or other agencies.

3. Recognising, responding and reporting

3.1 Recognising indicators of abuse and neglect

- All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard children (2018) and Keeping Children Safe in Education 2022.
- RIC recognise that when assessing whether a student may be suffering actual or potential harm there are four categories of abuse (for more in-depth information, see appendix 2):
 - Physical abuse
 - Sexual abuse
 - Emotional abuse
 - Neglect
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the student and their family.
- All members of staff are expected to be aware of and follow the below approach if they are concerned about a student: 'What to do if you are worried a student is being abused' 2015
- RIC recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of student abuse and neglect can vary from student to student. Students develop and mature at different rates, so what appears to be worrying behaviour for a younger student might be normal for an older student. It is important to recognise that indicators of abuse and neglect do not automatically mean a student is being abused; however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- RIC recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.
- Parental behaviours can indicate student abuse or neglect, so staff will be alert to parent-student interactions or concerning parental behaviours.
- Students may report abuse happening to themselves, their peers or their family members. All reports made by students to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the college. Students can be at risk of abuse or exploitation in situations outside their

families; extra-familial harms take a variety of different forms and students can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

- RIC recognises that technology can be a significant component in many safeguarding and wellbeing issues; students are at risk of abuse online from people they know (including other students) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.
- RIC recognises that some students have additional or complex needs and may require access to intensive or specialist services to support them.
- Following a concern about a student's safety or welfare, the searching of students and confiscation of any items, including any electronic devices, will be managed in line with the guidance 'Searching, screening and confiscation at school' informed by the DfE, updated in July 2022.
 - The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a student was in possession of a prohibited item as listed in our behaviour policy. The DSL (or assistant) will then consider the circumstances of the student who has been searched to assess the incident against any potential wider safeguarding concerns.
 - Staff will involve the DSL (or assistant) without delay if they believe that a search has revealed a safeguarding risk.

3.2 Responding to Child Protection concerns

- If staff are made aware of a Child Protection concern, they are expected to:
 - listen carefully to the student, reflecting back the concern.
 - use the student's language.
 - be non-judgmental.
 - avoid leading questions; only prompting the student where necessary with open questions to clarify information where necessary. For example who, what, where, when or Tell, Explain, Describe (TED).
 - not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially safeguarding partners.
 - be clear about boundaries and how the report will be progressed.
 - record the concern using the facts as the student presents them.
 - inform the DSL (or assistant), as soon as practically possible.
 - Reassure students that they are being taken seriously and will be supported and kept safe. Staff will ensure that the student does not feel ashamed or given the impression they are creating a problem.
- If staff have any concerns about a student's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or assistant).
- The DSL or an assistant should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff. Staff should speak to a member of the senior leadership team and take

advice from Medway Local Authority. In these circumstances, any action taken will be shared with a DSL as soon as possible.

- All staff are made aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a student is already known to other agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping students safe.
- RIC will respond to safeguarding concerns in line with the Medway Safeguarding Children policies and procedures. Where it is identified a student may benefit from Early Help support or support from the Local Authority Children's Social Care, the DSL (or assistant) will generally lead as appropriate and make a request for support.
 - The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns or seeking advice if the situation does not appear to be improving or is getting worse.
- All staff are made aware, through training, of the process for making referrals to Local Authority Children's Social Care and for statutory assessments under the Children's Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- Where a student is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under section 17 or 47 of the Children's Act), a referral will be made immediately to the Local authority and/or the police.
 - RIC's catchment area for students is varse and a large number have a main residence outside of Medway Local Authority. For all students in boarding, any referrals will be made to Medway Local Authority, for other students we will refer to the online tool [report child abuse to your local council](#) to find the relevant local authority children's social care and contact number to make a referral directly to them.
 - RIC recognises that in situations where there are immediate child protection concerns for a student, it is NOT to investigate as a single agency, but to act in line with Local Authority guidance which may involve multi-agency decision making.
 - The DSL may seek advice or guidance from the local authority or Medway education safeguarding service.
- In the event of a request for support from the Local Authority being necessary, parents/carers will be informed and consent to this will be sought by the DSL, unless there is a valid reason not to do so, for example, if to do so would put a student at risk of harm or would undermine a criminal investigation.
- If, after a request for support or any other planned external intervention, a student's situation does not appear to be improving, the DSL will re-refer (if appropriate). The DSL (or ADSL) will follow escalation procedures to ensure their concerns have been addressed and, most importantly, that the student's situation improves.

3.3 Recording concerns

- All safeguarding and child protection concerns, discussions, decisions, and reasons for those decisions, will be recorded in writing. Our records will include a clear and comprehensive

summary of any concerns, details of how concerns were followed up and resolved, and a note of any action taken, decisions reached including the rationale for these and outcomes.

- Any concerns are recorded on CPOMS.
- Records will be completed as soon as possible after the incident/event, using the student's words and will be digitally signed and dated by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if visible injuries have been observed.
- If there is an immediate safeguarding concern the member of staff will consult with a DSL (or ADSL) before completing the form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL (or ADSL).
- Child Protection records will be kept confidential and stored securely on CPOMS separately from all other records relating to the student. Child Protection records are kept in accordance with data protection legislation and are retained by the DSL.
- All Child Protection records will be transferred in accordance with data protection legislation to the student's subsequent college/school, under confidential and separate cover as soon as possible; within 5 days for an in-year transfer or within the first 5 days of the start of a new term. Child Protection files will be transferred securely to the new DSL, separately to the student's main file, and a confirmation of receipt will be obtained.
- In addition to the Child Protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a student leaving, for example, information that would allow the new school or college to continue to provide support.
- Where the college receives Child Protection files from another setting, the DSL will ensure key staff such as the Special Educational Needs Co-ordinators (SENCOs), form tutors or college nurses, will be made aware of relevant information as required.
- Where a student joins the school and no Child Protection files are received, the DSL will proactively seek to confirm from the previous setting whether any Child Protections exist for the student, and if so, if the files have been sent.

3.4 Multi-agency working

- RIC recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the multi-agency safeguarding arrangements as identified within 'Working Together to Safeguard students'.
- The college leadership team, governing body and DSL will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance.
- RIC recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote student's welfare and protect them from harm. This includes contributing to relevant safeguarding multi-agency plans and meetings.
- The college will allow access for children's social care to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

- the Principal and DSL are aware of the requirement for students to have an Appropriate Adult (PACE Code C 2019) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with the DfE 'Searching, screening and confiscation at school' guidance.

3.5 Confidentiality and information sharing

- RIC recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to Child Protection at the earliest opportunity as per statutory guidance outlined within KCSIE.
- RIC has an appropriately trained Data Protection Champion (Alistair Donaldson) as required by the UK General Data Protection Regulations (UK GDPR) to ensure that our college is compliant with all matters relating to confidentiality and information sharing requirements.
- Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping students safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of students (KCSIE 2022). KCSIE 2022, the Information Commissioner's Office (ICO) and the DfE "Information sharing advice for safeguarding practitioners" (2018) guidance provides further details regarding information sharing principles and expectations.
- the Principal and DSL will disclose relevant safeguarding information about a student with staff on a 'need to know' basis.
- All members of staff must be aware that whilst they have duties to keep information confidential, staff also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of students; this may include sharing information with the DSL and with other agencies as appropriate.
- All staff are aware they cannot promise a student that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the student.

3.6 Complaints

- All members of the college community should feel able to raise or report any concerns about student's safety or potential failures in the college safeguarding regime. The college has a complaints procedure available to parents/carers, students and members of staff and visitors who wish to report concerns or complaints. This can be found in on the school website
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Students and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk
- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding Child Protection failures internally.
 - Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.

- The leadership team at RIC will take all concerns reported to the college seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
 - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

4. Specific Safeguarding Issues

- RIC is aware of the range of specific safeguarding issues and situations that can put students at greater risk of harm. In addition to Part one, DSLs, college leaders and staff who work directly with students will read Annex B of KCSIE 2022 which contains important additional information about specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or an assistant.

4.1 Child on child abuse

- All members of staff at RIC recognise that students can abuse other students (referred to as child on child abuse, previously known as 'peer-on-peer' abuse), and that it can happen both inside and outside of college and online.
- RIC recognises that child on child abuse can take many forms, including but not limited to:
 - Bullying, including cyberbullying, prejudice-based and discriminatory bullying
 - Abuse in intimate personal relationships between students
 - Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - Sexual violence and sexual harassment
 - Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - Upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - Initiation/hazing type violence and rituals
- Any allegations of child on child abuse will be recorded, investigated, and dealt with in line with this policy and KCSIE 2022 - All reports must be made to the DSL (or ADSL) and the investigation and outcome will be recorded on CPOMS.
- RIC adopts a zero-tolerance approach to child on child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as "just banter", "just having a laugh" or "part of growing up"; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for students and a culture that normalises abuse, which can prevent students from coming forward to report it.

- All staff have a role to play in challenging inappropriate behaviours between students. Staff recognise that some child on child abuse issues may be affected by gender, age, ability and culture of those involved. For example, for gender based abuse, girls are more likely to be victims and boys more likely to be perpetrators.
- RIC recognises that even if there are no reported cases of child on child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported. As such, it is important that staff speak to the DSL (or ADSL) about any concerns.
- Staff should be aware of the potential risk of the following at RIC: an initially higher ratio of males to females in the lower years followed by increased numbers of females joining post or during puberty; mixed aged students within year groups, peer groups and classes; boarding facilities; a high proportion of students with SEND; a variety of cultural backgrounds; and a high proportion of students identifying amongst the LGBTQI+ community.
- In order to minimise the risk of child on child abuse, RIC will implement a robust anti-bullying policy, providing an age/ability appropriate PSHE and RSE curriculum, provide a range of reporting mechanisms, for example, *Whisper* and an independent listener, dedicated phone numbers and email address' for DSL and ADSLs. We also have dedicated tutor time and an ethos which prioritises the students' need to communicate when necessary.
- Concerns about students' behaviour, including child on child abuse taking place offsite will be responded to as part of a partnership approach with students and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and safeguarding and child Protection policies.
- Alleged victims, alleged perpetrators and any other student affected by child on child abuse will be supported by taking reports seriously, listening carefully, avoiding victim blaming, providing appropriate pastoral support, working with parents/carers where appropriate, working with boarding staff, reviewing educational approaches, following procedures as identified in other policies, for example, the college anti-bullying, behaviour and safeguarding and child protection policy, and where necessary and appropriate, informing the police and/or Local Authority Children's Social Care.
- The College recognises that child on child abuse may involve individuals from other settings and will take appropriate action to ensure necessary parties are informed in these instances.

4.2 Child on Child Sexual Violence and Sexual Harassment

- When responding to concerns relating to child on child sexual violence or harassment, RIC will follow the guidance outlined in Part five of KCSIE 2022.
- RIC recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here.' RIC recognises sexual violence and sexual harassment can occur between two students of any age and sex. It can occur through a group of students sexually assaulting or sexually harassing a single student or group of students and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.

- All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report.
- Abuse that occurs online or outside of the college will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures.
- RIC recognises that the law is in place to protect students and young people rather than criminalise them, and this will be explained in such a way to students that avoids alarming or distressing them.
- RIC recognises 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, so students may not be able to recall all details or timeline of abuse. All staff will be aware certain students may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.
- The DSL (or ADSL) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
 - The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other students involved/impacted, in line with part five of KCSIE 2022 and relevant local/national guidance and support.
 - The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other students, adult students, and staff and any actions that are required to protect them.
 - Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.
- Reports will initially be managed internally by the college and where necessary will be referred to safeguarding partners. Important considerations which may influence this decision include:
 - the wishes of the victim in terms of how they want to proceed.
 - the nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behavior has been displayed.
 - the ages of the students involved.
 - the developmental stages of the students involved.
 - any power imbalance between the students.
 - 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 students.
 - understanding intra familial harms and any necessary support for siblings following incidents.
 - whether there are any ongoing risks to the victim, other students, adult students, or college staff.

- any other related issues and wider context, including any links to student sexual exploitation and student criminal exploitation.
- The college will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a student at additional risk. Any information shared with parents/carers will be in line with information sharing expectations and any data protection requirements, and where they are involved, will be subject to discussion with other agencies to ensure a consistent approach is taken.
- If at any stage the DSL is unsure how to proceed, advice will be sought from the Education Safeguarding Service.

4.3 Nude and/or semi-nude image sharing by students

- RIC recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or ADSL).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by students, staff are advised:
 - to report any concerns to the DSL immediately.
 - never to view, copy, print, share, forward, store or save the imagery, or ask a student to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
 - not to delete the imagery or ask the student to delete it.
 - to avoid saying or doing anything to blame or shame any students involved.
 - to reassure the student(s) involved and explain that the DSL will be informed so they can receive appropriate support and help. Do not promise confidentiality, as other agencies may need to be informed and be involved.
 - not to investigate or ask the student(s) involved to disclose information regarding the imagery
 - to not share information about the incident with other members of staff, students, or parents/carers, including the families and student(s) involved in the incident; this is the responsibility of the DSL.
- DSLs will respond to concerns in line with the non-statutory UKCIS guidance: 'Sharing nudes and semi-nudes: advice for education settings working with students and young people' and the local guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
 - The DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any student involved. This may mean speaking with relevant staff and the students involved as appropriate.
 - Parents/carers will be informed at an early stage and be involved in the process to best support students, unless there is good reason to believe that involving them would put a student at risk of harm.

- All decisions and action taken will be recorded in line with our Child Protection procedures.
- A referral will be made to children's social care and/or the police immediately if:
 - the incident involves an adult (over 18).
 - there is reason to believe that a student has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the student or they have special educational needs.
 - the image/videos involve sexual acts and a student under the age of thirteen, depict sexual acts which are unusual for the student's developmental stage, or are violent.
 - a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

4.4 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

- RIC recognises that both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a student into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect students, both male and female and can include students who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- RIC recognises that students can become trapped in CCE as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Students involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older students) and they are not treated as victims, despite the harm they have experienced. The experience of girls who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of student sexual exploitation (CSE).
- RIC recognises that CSE can occur over time or be a one-off occurrence and may happen without the student's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any student who has been coerced into engaging in sexual activities and includes 16 and 17 year olds who can legally consent to have sex. Some students may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.
- If staff are concerned that a student may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL (or ADSL).

4.5 Serious Violence

- All staff are aware of the indicators which may signal students are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that students have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of CCE.
- Any concerns regarding serious violence will be reported and responded to in line with other Child Protection concerns by speaking with a DSL (or ADSL). The initial response to student victims is important and staff will take any allegations seriously and work in ways that support students and keep them safe.

4.6 So-called Honour Based Abuse (HBA)

- So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.
- All forms of HBA are abuse, regardless of the motivation, and concerns will be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or an assistant). If there is an immediate threat, the police will be contacted.
- Whilst all staff will speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.
 - If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

4.7 Preventing radicalisation

- RIC is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have "due regard to the need to prevent people from being drawn into terrorism", also known as the Prevent duty (2021) and the specific obligations placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.
- RIC recognises that students are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in student's behaviour which could indicate that they may be in need of help or protection.
- Staff will report any concerns to the DSL (or ADSL), who is aware of the local procedures to follow. If there is an immediate threat, the police will be contacted via 999.

4.9 Cybercrime

- RIC recognises that students with particular skill and interest in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline

but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.

- If staff are concerned that a student may be at risk of becoming involved in cyber-dependent cybercrime, the DSL (or ADSL) will be informed, and consideration will be given to accessing local support and/or referring into the Cyber Choices programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, student sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with the Child Protection and other appropriate policies.

4.10 Domestic abuse

- RIC recognises that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional abuse. Students can be victims of domestic abuse and may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Domestic abuse can have a detrimental and long-term impact on a student's health, well-being, development, and ability to learn.
- RIC is an Operation Encompass School. This means we work in partnership with Kent Police to provide support to students experiencing domestic abuse.
- If staff are concerned that a student may be at risk of seeing, hearing, or experiencing domestic abuse in their home or in their own intimate relationships, immediate action should be taken by speaking to the DSL (or ADSL).

4.11 Mental health

- All staff recognise that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff are aware that student's experiences, for example where students have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.
- Staff are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a student that is also a safeguarding concern, immediate action should be taken by speaking to the DSL (or ADSL).
- At RIC we have access to a Registered Nurse (Ben Wells), a Counsellor and an independent listener for students. We also have a wide range of additional support services we are able to refer or signpost towards, including Health Assured.

5. Supporting students Potentially at Greater Risk of Harm

- Whilst all students should be protected, RIC acknowledges that some groups of students are potentially at greater risk of harm. This can include the following groups:

5.1 Safeguarding students with Special Educational Needs or Disabilities (SEND)

- RIC acknowledges that students with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges both online and offline, and barriers for adults to recognise their exposure to abuse and neglect. This could include assumptions about their behaviours or emotions being linked to their disability and their cognitive understanding of safeguarding incidents.
- RIC recognises that students with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Students with SEND will be supported to communicate and ensure that their voice is heard and acted upon.
- RIC recognises that a large percentage of our students are EAL - we will always ensure that they are supported and have access to a means of communication with the adults.
- All members of staff are encouraged to appropriately explore potential indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the student's disability. Staff will be mindful that students with SEND or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that students with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, our college will always consider implementing extra pastoral support and attention for students with SEND. The DSL will work closely with the SENCo (Leighton Bright) to plan support as required.

5.2 Students requiring mental health support

- RIC has an important role to play in supporting the mental health and wellbeing of our students. Mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation.
- Where there are concerns regarding possible mental health problems for students, staff should ensure that the Pastoral Lead and DSL are aware.
- As a college, we have access to a school counsellor and an independent listener who are available for the students to access. Whisper also provides an additional tool for students to refer into. We place high priority in ensuring that staff receive appropriate support where appropriate..
- Age/ability appropriate education will be provided to our students to help promote positive health, wellbeing, and resilience.

5.3 Children Missing from Education (CME)

- Students missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and student sexual and criminal exploitation - particularly county lines. A robust response to students missing from education will support the identification of such abuse and may help prevent the risk of students going missing in the future.
- Where possible, the college will hold more than one emergency contact number for each student so we have additional options to make contact with a responsible adult if a student missing in education is also identified as being a welfare and/or safeguarding concern.
- Where the college has concerns that a student is missing from education, we will respond in line with our statutory duties (DfE: children missing education), Medway local authority guidelines and the College Attendance Policy.

5.4 Students who need a social worker (Child in need and Child Protection plans)

- The DSL will hold details of social workers working with students in the college so that decisions can be made in the best interests of the student's safety, welfare, and educational outcomes.
- Where students have a social worker, this will inform college decisions about their safety and welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

5.5 Looked after children, previously looked after children and care leavers

- RIC recognises the common reason for students becoming looked after is as a result of abuse and/or neglect and a previously looked after student also potentially remains vulnerable.
- The school has appointed a 'designated teacher' (Leighton Bright, SENCo) who works with local authorities, to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.
- The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a student's looked after legal status, contact arrangements with birth parents/carers or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.
- Where a student is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the student.
- Where the college believe a student is being cared for as part of a private fostering arrangement (occurs when a student under 16 or 18 if the student is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority.
- Where a student is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

5.6 Students who are Lesbian, Gay, Bi, or Trans (LGBT)

- The fact that a student or a young person may be LGBT is not in itself an inherent risk factor for harm, however, RIC recognises that students who are LGBT or are perceived by other students to be LGBT (whether they are or not) can be targeted by other students or others within the wider community.
- RIC recognises risks can be compounded where students who are LGBT lack a trusted adult with whom they can be open. LGBT is included within our RSE curriculum and our staff will endeavour to reduce the additional barriers faced and provide a safe space for students to speak out or share any concerns.

6. Online Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. RIC will adopt a whole college approach to online safety which will empower, protect, and educate our students and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- RIC will ensure online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures, and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- RIC identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas 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: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (including consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
 - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- RIC recognises that technology, and the risks and harms related to it, evolve and change rapidly. The college will carry out an annual review of our approaches to online safety annually, supported by an annual risk assessment, which considers and reflects the current risks our children face online.
- The Principle will be informed of any online safety concerns by the DSL, as appropriate. Online safety incidents will be included in all reports to Governors.

6.1 Policies and procedures

- The DSL has overall responsibility for online safety within the college but will liaise with other members of staff, for example IT technicians and curriculum leads as necessary.
- The DSL will respond to online safety concerns in line with all other Child Protection concerns.
 - Internal sanctions and/or support will be implemented as appropriate.
 - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- RIC uses a wide range of technology. This includes: computers, laptops, tablets and other digital devices, the internet, Google platform and email systems.
 - All college owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- RIC recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2022 RIC has appropriate mobile and smart technology in place, which are shared and understood by all members of the community.

6.2 Appropriate filtering and monitoring

- RIC will do all we reasonably can to limit children's exposure to online risks through college provided IT systems and will ensure that appropriate filtering and monitoring systems are in place.
 - If students or staff discover unsuitable sites or material, they are required to make staff members aware who will alert our Director of IT, Peter Holl.
 - the Principal, DSL and Director of IT have an awareness and understanding of the filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
 - All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
 - Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.
 - Any access to material believed to be illegal will be reported immediately to the relevant agencies, such as the Internet Watch Foundation and the police.
 - When implementing appropriate filtering and monitoring, RIC will ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of RIC's approach to online safety.
 - Students will use appropriate search tools, apps and online resources.
 - Internet use will be supervised by staff as appropriate to students' age and ability.
 - Students will be directed to use age/ability appropriate online resources and tools by staff.
 - Students will be taught explicitly the risks, consequences and support available for online safety.

6.3 Information security and access management

- RIC is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and students. Further information can be found in our staff Acceptable Use Policy
- RIC will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

6.4 Remote/Online learning

- RIC will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance.
- All communication with students and parents/carers will take place using college provided or approved communication channels; for example, college provided email accounts and phone numbers and Google Classroom.
 - Any pre-existing relationships or situations will be discussed with the DSL.
- Staff and students will engage with remote teaching and learning in line with existing behaviour principles as set out in our college code of conduct and Acceptable Use Policies.
- Staff and students will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.

6.5 Staff training

- RIC will ensure that all staff receive online safety training as part of induction and that ongoing online safety training and updates for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach.

6.6 Educating students

- RIC will ensure a comprehensive whole college curriculum response is in place to enable all students to learn about and manage online risks effectively as part of providing a broad and balanced curriculum.

6.7 Working with parents/carers

- RIC will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential benefits and risks and to reinforce the importance of children being safe online by providing information on our college website and through existing communication channels (such as official social media, newsletters), offering specific online safety events for parents/carers or highlighting online safety at existing events.
- Where the college is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE 'Harmful online challenges and online hoaxes' guidance to ensure we adopt a proportional and helpful response.

7. Staff awareness, Induction and Training

- All members of staff have been provided with a copy of part one or annex A of 'Keeping Children Safe in Education' 2022 which covers safeguarding information for staff.
 - college leaders, including the DSL will read KCSIE in its entirety.
 - college leaders and all members of staff who work directly with students will read annex B.
 - All members of staff have electronically signed to confirm that they have read and understood the national guidance shared with them, this confirmation is kept centrally by the DSL
 - All staff will receive a copy of the Safeguarding and Child Protection Policy 2022 and will electronically sign to ensure they have read and understood this . This will also be in the induction pack for all new members of staff.
 - All new staff and volunteers receive safeguarding and Child Protection training (including online safety and Prevent), including information to ensure they are aware of the college internal safeguarding processes, as part of their induction. This training is regularly updated and is in line with advice from the safeguarding partners.
- All governors receive appropriate safeguarding and Child Protection (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenges to test and assure that our safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. This training is regularly updated.
- At induction and whenever updated, staff and volunteers will receive a copy of the behaviour policy, this will be read, understood and will be signed for electronically.
- All Safeguarding and Child Protection training will be updated at least annually and records of this training will be kept by the DSL.
- Online safety training for staff will be integrated, aligned and considered as part of the whole college safeguarding approach and wider staff training and curriculum planning.
- In addition to specific Child Protection training, all staff will receive regular safeguarding and Child Protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard students effectively. These will be communicated in a variety of ways including face to face conversations, email, e-bulletins and staff meetings.
- RIC recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis and staff are encouraged to contribute to and shape college safeguarding arrangements and Child Protection policies.
- The DSL and Principal will report to the governing body, detailing safeguarding training undertaken by all staff and will maintain an up to date record of who has been trained.

7.1 Safer working practice

- All members of staff are required to work within our clear guidelines on safer working practice.
- Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all students. Any physical interventions

and/or use of reasonable force will be in line with our agreed policy and procedures, and national guidance.

- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant college policies including staff code of conduct.

7.2 Supervision and support

- The induction process will include familiarisation with Child Protection responsibilities and procedures to be followed if members of staff have any concerns about a student's safety or welfare.
- The college will provide appropriate supervision and support for all members of staff to ensure that:
 - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of students
 - All staff are supported by the DSL in their safeguarding role.
 - All members of staff have regular reviews, where appropriate, of their own practice to ensure they improve over time.
- Any member of staff affected by issues arising from concerns for students' welfare or safety can seek support from the DSL or the independent listener.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

8 Safer Recruitment and Allegations Against Staff

8.1 Safer recruitment and safeguarding checks

- RIC is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our students and staff.
 - RIC will follow relevant guidance in Keeping Children Safe in Education 2022 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)
 - The governing body and leadership team are responsible for ensuring that the college follows safe recruitment processes as outlined within guidance.
 - The governing body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.
- The college maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- RIC is committed to supporting the statutory guidance from the Department for Education on the application of the childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We advise all staff to disclose any reason that may affect their suitability to work with students including convictions, cautions, court orders, reprimands, and warnings.
- Where the college places a student with an alternative provision provider, the college will continue to be responsible for the safeguarding of that student.

- The college will undertake appropriate checks to ensure the provider meets the needs of the student, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.
- Where the college organises work experience placements, we will follow the advice and guidance as identified in Part three of KCSIE 2022.

8.2 Allegations/concerns raised in relation to staff, including supply teachers, volunteers and contractors

- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE 2022) and the local allegations arrangements. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the college from potential false allegations or misunderstandings.
- All concerns relating to staff contractors will be referred to their employers so any pattern of inappropriate behaviour can be monitored
- Where the Principal is unsure how to respond, for example if the college is unsure if a concern meets the harm 'thresholds', advice will be sought via Medway Local Authority Designated Officer (LADO) enquiry line.
- In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the Principal (and if they have been involved the LADO) will consider the facts and determine whether any lessons can be learned and if any improvements can be made.

8.2.1 Concerns that meet the 'harm threshold'

- RIC recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with students in a school or college. This includes when someone has:
 - behaved in a way that has harmed a student, or may have harmed a student
 - possibly committed a criminal offence against or related to a student
 - behaved towards a student or students in a way that indicates he or she may pose a risk of harm to students
 - behaved or may have behaved in a way that indicates they may not be suitable to work with students.
- Allegations against staff which meet this threshold will be responded to and managed in line with part four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the Principal who will contact the LADO to agree further action to be taken in respect of the student and staff member.
- In the event of allegations of abuse being made against the Principal, staff are advised that allegations should be reported to the Safeguarding Governor, Tim Fish, who will contact the LADO. If the concern is related to the Safeguarding Governor, LADO will be informed immediately.

8.2.2 Concerns that do not meet the 'harm threshold'

- RIC may also need to take action in response to 'low-level' concerns about staff.
 - RIC has an open and transparent culture in which all concerns about all adults working in or on behalf of the college are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the college are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.
 - A 'low-level' concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the college may have acted in a way that is inconsistent with our staff code of conduct, including inappropriate conduct outside of work and does not meet the 'harm threshold' or is otherwise not serious enough to consider a referral to the LADO.
 - Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a student, parent or other adult within or outside of the organisation, or as a result of vetting checks.
 - In the event of low level concerns being made against the Principal, staff are advised that allegations should be reported to the Safeguarding Governor, Tim Fish, who will contact the LADO. If the concern is related to the Safeguarding Governor, LADO will be informed immediately.
- It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.
- Low-level concerns should be shared confidentially to Alistair Brownlow, Principal who may nominate another member of staff to investigate and report back to him for decision making.
 - The Principal will share concerns and liaise with the LADO enquiries officer via the LADO Enquiry Line.
 - If the college is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.
- Low-level concerns will be recorded in writing on a standardised form (Appendix 4), taking into account the requirements of KCSIE 2022. These will be reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.
 - Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
 - Where a pattern is identified, the college will implement appropriate action, for example; consulting with the LADO enquiry line, implementing additional training, reviewing school culture and following our disciplinary procedures.

8.3 Safe Culture

- As part of our approach to safeguarding, the college has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff code of conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the college safeguarding regime. The leadership team at RIC will take all concerns or allegations received seriously.
- All members of staff are made aware of the college Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a student at risk.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding Child Protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- RIC has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a student, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.
 - If these circumstances arise in relation to a member of staff at our college, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO.

9 Opportunities to Teach Safeguarding

- RIC will ensure that students are taught about safeguarding, including online safety, as part of providing a broad, progressive and balanced curriculum.
- We recognise that the college plays an essential role in helping students to understand and identify the parameters of what is appropriate student and adult behaviour, what is 'safe,' to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that students have a range of age appropriate contacts and strategies to ensure their own protection and that of others.
- RIC recognises the crucial role we have to play in preventative education. Preventative education is most effective in the context of a whole-college approach which prepares

students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.

- RIC has a clear set of values and standards, upheld and demonstrated throughout all aspects of college life which are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence-based PSHE and RSE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate.
- RIC recognises that a one size fits all approach will not be appropriate for all students, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual students might be needed, for example students who are victims of abuse and students with SEND.
- Our college systems support students to talk to a range of staff. All students will be listened to and heard, and their concerns will always be taken seriously and acted upon as appropriate.

10 Physical Safety

10.1 Use of 'reasonable force'

- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard students from harm. Our approach and expectations are in line with the DfE 'Use of reasonable force in schools' guidance and are further outlined in our policy on physical intervention and positive handling.

10.2 The use of premises by other organisations

- Where services or activities are provided separately by another body using the college facilities/premises, the Principal and governing body will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding students and Child Protection, and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved, an application to use premises will be refused.
- Safeguarding requirements will be included in any transfer of control agreement (such as a lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

10.3 Site security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into college as outlined within national guidance. Visitors will be expected to sign in and out via the office and to display a visitor's badge whilst on site.
- Staff and visitors will be expected to adhere to any safety arrangements implemented in response to any Covid-19 restrictions.

- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.
- The college will not accept the behaviour of any individual (parent or other) that threatens college security or leads others (student or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the college site.

Created/Updated	Author	Approved by	Date
August 2022	KS	AB	August 2022

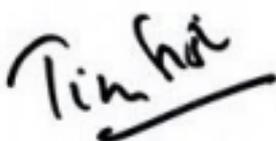
This policy has been authorised by the Principal and the Safeguarding Governor:

Name of Principal: Alistair Brownlow

Signed: 

Date: 25 August 2022

Name of Safeguarding Governor: Tim Fish

Signed: 

Date: 30 August 2022

Appendix 1: Local Support

All members of staff in RIC are made aware of local support available.

- Medway Safeguarding students Partnership: 01634 336 329
- Medway Council Social Care 01634 334 466
- Medway Out of Hours exclusive of 9:00-17:00 Mon-Fri 03000 419 191
- Medway no name consultation line 9:30-12:30 Mon-Fri 01634 331 662
- Independent Schools Inspectorate 0207 600 0100
- Non-emergency police number 101
- DfE helpline 0207 3407264
- NSPCC Whistleblowing helpline 0800 028 0285
- Safeguarding Governor Tim Fish 0203 696 5300
- Fiona Veitch Education Safeguarding Officer Medway fiona.veitch@medway.gov.uk 01634 331 464
- Karen Harper Family Solutions Coordinator Medway karen.harper@medway.gov.uk 07525 925 952

Appendix 2: Categories of Abuse

All staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse: a form of maltreatment of a student. Somebody may abuse or neglect a student by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another student or students. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and students.

Sexual abuse: involves forcing or enticing a student or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the student is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving students in looking at, or in the production of, sexual images, watching sexual activities, encouraging students to behave in sexually inappropriate ways, or grooming a student in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other students.

Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide

- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults, for example, anxiety of being left with relatives, a studentminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

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 student. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a student.

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

Emotional abuse: the persistent emotional maltreatment of a student such as to cause severe and adverse effects on the student's emotional development. It may involve conveying to a student 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 student 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 students. These may include interactions that are beyond a student's developmental capability as well as overprotection and limitation of exploration and learning or preventing the student participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing students frequently to feel frightened or in danger, or the

exploitation or corruption of students. Some level of emotional abuse is involved in all types of maltreatment of a student, although it may occur alone.

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents/carers being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

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

Signs that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

Appendix 3: Support Organisations

NSPCC 'Report Abuse in Education' Helpline

- 0800 136 663 or help@nspcc.org.uk

National Organisations

- NSPCC: www.nspcc.org.uk
- Barnardo's: www.barnardos.org.uk
- Action for students: www.actionforstudents.org.uk
- students's Society: www.studentssociety.org.uk
- Centre of Expertise on student Sexual Abuse: www.csacentre.org.uk

Support for Staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- Harmful Sexual Behaviour Support Service:
<https://swgfl.org.uk/harmful-sexual-behaviour-support-service>

Support for students

- studentLine: www.studentline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

Support for Adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in studenthood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Shout: www.giveusashout.org
- Advice now: www.advicenow.org.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled students: <https://councilfordisabledstudents.org.uk>

Contextual Safeguarding Network

- <https://contextualsafeguarding.org.uk/>

Substance Misuse

- Talk to Frank: www.talktofrank.com

Domestic Abuse

- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadvice.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phonenumber: <https://respectphonenumber.org.uk>

Criminal and Sexual Exploitation

- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org
- County Lines Toolkit for Professionals:
www.studentssociety.org.uk/information/professionals/resources/county-lines-toolkit

Honour Based Abuse

- Karma Nirvana: <https://karmanirvana.org.uk>
- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information:
www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information
- The right to choose - government guidance on forced marriage:
www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage

child on Child abuse, including bullying, sexual violence and harassment

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- parents/carers Protect: www.parents/carersprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk

- Diana Award: www.antibullyingpro.com/
- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk

Online Safety

- NCA-CEOP: www.ceop.police.uk and www.thinkuknow.co.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- studentnet: www.studentnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/onlinesafety
- Get Safe Online: www.getsafeonline.org
- parents/carers Protect: www.parents/carersprotect.co.uk
- Cyber Choices:
<https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk

Mental Health

- Mind: www.mind.org.uk
- Moodspark: <https://moodspark.org.uk>
- Young Minds: www.youngminds.org.uk
- Anna Freud: www.annafreud.org/schools-and-colleges/

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Students with Family Members in Prison

- National information Centre on students of Offenders (NICCO): <https://www.nicco.org.uk/>



Appendix 4 - Low level concerns record

2022/2023

Date the concern was raised	
Date of conclusion	
Name of the person the concern has been raised against.	
Name of the individual sharing the concern (confidentially is to be protected as far as reasonably possible)	
Name and role of the person completing this form (ensuring that any delegation comes directly from the Principle)	
Details of the Concern, including the context in which the concern arose.	
Action Taken	
Conclusion, including any further actions	