



**Designated Safeguarding Lead: Maeva Elliott, Head of Boarding 01634 828115**

**Deputy Designated Safeguarding Lead: Kelly Flatman, Head of Lower School 01634 828115**

The College Proprietor is Dukes Education Group Limited.

The nominated governor with responsibility for Safeguarding is Glenn Hawkins.

Dukes Education Group Safeguarding Lead, known as the Company Safeguarding Lead, who acts as an advisor on safeguarding issues and supports the Governors in compliance and quality assurance, is Paul Ludlow.

The College Principal is Alistair Brownlow.

The Safeguarding Policy should be read alongside and in conjunction with the Anti-Bullying, Health and Safety, Physical Intervention, Whistleblowing and Safer Recruitment policies. Together these constitute the suite of policies to safeguard and promote the welfare of students in Rochester Independent College.

**If a concern is brought to you by a colleague, student or parent you must bring it to the attention of Maeva or Kelly immediately.**

The aim of the College is to create an environment in which everyone feels safe and secure and students are listened to at all times. As well as day students, the College has boarders from the age of 16. Their safety and welfare needs are provided for bearing in mind that they are living away from home. Furthermore, students with special education needs and disabilities may have to deal with additional safeguarding trials, with extra challenges for staff when recognising abuse and neglect in this particular group of students. This could include assumptions that their mood, injury or behaviour is related to the student's disability rather than any possible abuse. Students in the SEN/D group may also be significantly affected by abusive behaviour whilst not outwardly showing any signs. It is important that a culture of listening to students is encouraged and maintained so that they feel comfortable to approach staff with the worries or concerns that they may have.

Safeguarding is everyone's responsibility. This policy is designed to help all staff to ensure the safety and security of students at the College. It is reviewed by the Principal annually and where changes need to be made the policy is updated without delay. This policy is written in accordance with Kent and Medway Safeguarding Children Policies and Procedures, Working Together to Safeguard Children 2015 and Keeping Children Safe In Education September 2016.

Safeguarding children is defined, according to Keeping Children Safe in Education 2016, as protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best life chances. Child abuse is a form of maltreatment of a child. A person may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. They may be abused in a family or institutional setting by someone they know, who may be an adult, adults, a child or children.

As the procedures below make clear, the College Safeguarding Policy is designed to protect both children who are at risk of harm and those who need additional support. In cases of risk of harm children's social care services will be involved and it may be necessary to contact the police. For children about whom there is a concern and who need additional support this would take the form of support within the school - form tutors, the College nurse and the DSLs and may also involve other agencies through the use of the Common Assessment Framework or the Team Around the Child. In all cases the College should consider at all times what is in the best interests of the child.

The Designated Safeguarding Leads should attend the DSL refresher Safeguarding training courses every two years, which cover current Safeguarding practices and inter-agency working. In any event all members of staff, including temporary and voluntary staff, should receive updated Safeguarding training every year, which may take the form of external training, staff meetings and informal updates by email, which is in accordance with the requirements of Medway Safeguarding Children's Board. The training includes the Principal.

All members of staff are required to read Keeping Children Safe in Education September 2016. As indicated in the staff handbook and contract of employment, staff employed by the College are subject to the National Union of Teachers Code of Conduct and also to the College Code of Conduct, which covers staff/pupil relationships and appropriate use of social media.

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

- this Safeguarding Policy
- Safeguarding Training in accordance with Medway Safeguarding Children Board procedures
- the staff Code of Conduct
- the Whistleblowing Procedure
- the role of the Designated Safeguarding Leads and their identity and contact details
- a copy of Part 1 of Keeping Children Safe in Education
- National Minimum Standards (boarding staff)

### **Statutory framework**

The Children's Act 1989, 2004 and 2006 provides the legal framework for the protection of children in the UK.

'Working Together to Safeguard Children, 2015' sets out how all agencies and professionals should work together to promote the welfare of children and to protect them from neglect and abuse.

'Keeping Children Safe in Education' places the following responsibilities on all schools.

- Staff should be alert to signs of abuse and know to whom they should report any concerns or suspicions
- A DSL should have responsibility for coordinating action within the College and liaising with other agencies
- Staff with designated responsibility for Child Protection should receive appropriate training
- College should have procedures, of which all the staff are aware, for handling suspected cases of abuse of students, including procedures to be followed if a member of staff is accused of abuse
- The College will take steps to ensure that staff employed by another organisation who are working with the College's students have undergone the necessary safeguarding checks and procedures
- 'Keeping Children Safe in Education' also states that parents/guardians should be made aware of the College's Safeguarding Policy and the fact that this may require cases to be referred to the investigative agencies in the interests of the child

'Keeping Children Safe in Education' notes that children can be particularly vulnerable in residential situations. Staff who have contact with boarders should be alert to relationships in boarding and the potential for bullying, sexual relationships, alcohol and drug misuse leading to abuse by peers and should report any concerns.

### **Priorities**

A member of staff should be concerned if a student:

- has an injury which is not typical of the bumps and scrapes normally associated with children's activities
- has unexplained injuries. Any unexplained injuries should be reported.
- frequently has injuries, even when apparently reasonable explanations are given
- offers confused or conflicting explanations about how injuries were sustained
- exhibits significant changes in behaviour, performance or attitude
- indulges in sexual behaviour, which is unusually explicit and/or inappropriate for his/her age; discloses an experience in which he/she may have been significantly harmed

### **Types of abuse**

Child abuse has many different forms but is categorised under the following with both Physical and Behavioural indicators:

- Physical Injury
- Neglect
- Sexual Abuse
- Emotional Abuse

Staff should also be alert to the possibilities of child sexual exploitation, female genital mutilation and the radicalisation of children. The signs and symptoms (below) may be indicators of abuse, but bear in mind that children may exhibit one or more of these signs for other reasons. Any concerns must be reported to one of the DSLs immediately. Definitions of the forms of abuse according to Keeping Children Safe in Education are given below:

**Abuse**

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

**Physical abuse**

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

**Emotional abuse**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse**

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

**Neglect**

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

## **Signs and symptoms**

Everyone should be aware of the signs and symptoms as given by the NSPCC and report any concerns.

### **Physical signs of abuse may include**

- unexplained bruising, marks or injuries on any part of the body
- multiple bruises- in clusters, often on the upper arm, outside of the thigh
- cigarette burns
- human bite marks
- broken bones
- scalds, with upward splash marks,
- multiple burns with a clearly demarcated edge

### **Changes in behaviour that can indicate physical abuse include**

- fear of parents being approached for an explanation
- aggressive behaviour or severe temper outbursts
- flinching when approached or touched
- reluctance to get changed, for example in hot weather
- depression
- withdrawn behaviour
- running away from home

### **Changes in behaviour which can indicate emotional abuse include**

- neurotic behaviour eg sulking, hair twisting, rocking
- being unable to play
- fear of making mistakes
- sudden speech disorders
- self-harm
- fear of parent being approached regarding their behaviour
- developmental delay in terms of emotional progress

### **Physical signs of sexual abuse may include**

- pain or itching in the genital area
- bruising or bleeding near genital area
- sexually transmitted disease
- vaginal discharge or infection
- stomach pains
- discomfort when walking or sitting down
- pregnancy

**Changes in behaviour which can also indicate sexual abuse include**

- sudden or unexplained changes in behaviour eg becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- having nightmares
- running away from home
- sexual knowledge which is beyond their age, or developmental level
- sexual drawings or language
- bedwetting
- eating problems such as overeating or anorexia
- self-harm or mutilation, sometimes leading to suicide attempts
- saying they have secrets they cannot tell anyone about
- substance or drug abuse
- suddenly having unexplained sources of money
- not allowed to have friends (particularly in adolescence)
- acting in a sexually explicit way towards adults

**Physical signs of neglect may include**

- constant hunger, sometimes stealing food from other children
- constantly dirty or smelly
- loss of weight, or being constantly underweight
- inappropriate clothing for the conditions

**Changes in behaviour which can also indicate neglect may include**

- complaining of being tired all the time
- not requesting medical assistance and/or failing to attend appointments
- having few friends
- mentioning being left alone or unsupervised

The above signs and symptoms may or may not be because of Child Protection/Safeguarding issues but should be a consideration.

**Child sexual exploitation (CSE)** involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can range from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. There is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. Some young people who are being sexually exploited do not exhibit any external signs of this abuse.

### **Honour-based violence**

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or community. This includes Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of HBV are abuse and should be treated as such. A forced marriage is where one or both parties enter into it without their full and free consent and where violence, threats or coercion is carried out in order for the person to enter into the marriage. Some communities may use religion and culture as a way to force a person into marriage. Schools have an important role to play in Safeguarding children from forced marriage. It is illegal in England and Wales.

### **Female Genital Mutilation**

Since 2003 it has been illegal not only to practice Female Genital Mutilation (FGM) in Britain but also to take British residents overseas for the procedure. This is a criminal offence and must be reported to Children's Social Care. From October 2015 it will be mandatory for teachers to report to the police instances where they discover that FGM appears to have been carried out. Teachers should be alert to girls talking about 'going abroad for a special ceremony or 'to become a woman' and discuss with the DSL and involve Medway Safeguarding Children's Board without delay.

### **Radicalisation**

Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. Young people are susceptible to grooming by extremists, particularly online. Staff need to be alert to signs that young people might be being drawn into extremism, particularly in their use of social media.

These signs may include

- disclosures by students of their exposure to the extremist actions, views or materials of others outside school, such as in their homes or community groups, especially where pupils have not actively sought these out
- students accessing extremist material online, including through social networking sites; peer or parental reports of
- changes in behaviour, friendship or actions and requests for assistance
- intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
- students voicing opinions drawn from extremist ideologies and narratives and the expression of extremist views, defined as: 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs
- and/or calls for the death of members of our armed forces, whether in this country or overseas

Channel is the programme that provides support to those vulnerable to radicalisation. All staff are required to complete the online Channel training programme, which provides guidance on signs that a person may be vulnerable to radicalisation or exploitation. If a member of staff has concerns about a student in this regard they should discuss it with the DSLs, who will refer to Channel if necessary.

### **Child missing from education**

All children, regardless of their circumstances, are entitled to a full-time education. A child going missing from education may be an indicator of abuse or neglect, so it is essential that all staff are alert to the signs to look out for and the individual triggers to be aware of when considering the risks of safeguarding concerns such as FGM, forced marriage and travelling to conflict zones.

The local authority must be informed of any child who is going to be deleted from the admission register where they:

- have been taken out of school/college by their parents/guardians and are being educated outside the school system eg home education
- have ceased to attend school/college and no longer live within reasonable distance of the school/college at which they are registered
- have been certified by the school/college medical officer as unlikely to be in a fit state of health to attend school/college before ceasing to be of compulsory school age, and neither he/she nor his/her parents/guardians have indicated the intention to continue to attend the school/college after ceasing to be of compulsory school age
- are in custody for a period of more than four months due to a final court order and the Proprietor does not reasonably believe they will be returning to the school/college at the end of that period
- have been permanently excluded. Notification should be made as soon as the grounds for deletion are met, but no later than deleting the student's name from the register

It is essential that schools comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

All schools/colleges must inform the local authority of any pupil who fails to attend regularly, or has been absent without the school/college's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State.

### **Roles and responsibilities**

The DSLs will always seek the advice of local services and the broad areas of responsibility for the designated safeguarding lead are, as described in annex B of KCSIE to Manage Referrals and:

- refer promptly all cases of suspected abuse to the local authority children's social care and the Designated Safeguarding Lead(s) for Child Protection concerns (all cases which concern a staff member)
- disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or police (cases where a crime may have been committed)
- liaise with the Principal to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies

## **Training**

The DSL should receive appropriate training carried out every two years in order to:

- understand the assessment process for providing early help and intervention, eg through locally agreed common and shared assessment processes such as early help assessments
- have a working knowledge of how local authorities conduct a Child Protection case conference and a Child Protection review conference and be able to attend and contribute to these effectively when required to do so
- ensure each member of staff has access to and understands the College's Safeguarding/Child Protection Policy and procedures, especially new and part time staff
- be alert to the specific needs of children in need, those with special educational needs and young carers
- be able to keep detailed, accurate, secure written records of concerns and referrals
- obtain access to resources and attend any relevant or refresher training courses
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them

## **Raising awareness – the DSL should**

- ensure the College's policies are known and used appropriately
- ensure the College's Safeguarding/Child Protection Policy is reviewed annually; the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the Safeguarding/Child Protection Policy is available publicly and parents/guardians are aware that referrals about suspected abuse or neglect may be made and the role of the College in this
- link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on Safeguarding
- where a student leaves the College ensure their Safeguarding/Child Protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt should be obtained.

The DSLs meet at least once a month to review issues raised by staff or students.

All members of staff have a responsibility to prevent abuse and protect children from abuse. All staff, including temporary and volunteer staff, must have Safeguarding training in accordance with the requirements of the local children safeguarding board every year and follow the guidelines given in that training and in College safeguarding policies.

## **Support**

Dealing with a disclosure from a child is likely to be a stressful experience. The member of staff concerned should consider seeking support for him or herself and discuss this with one of our designated DSLs.

## **Procedures**

If a member of staff has a concern that is in anyway related to Safeguarding issues it should be reported to or discussed with one of the DSLs. If there are no Safeguarding issues it should be discussed with the Form /Personal Tutor.

The member of staff must record information regarding the concern the same day. The record must be clear, precise, factual account of the observations. The recording forms must be used.

One of our designated DSLs will decide whether the concerns should be referred to Children Social Care, Medway Council. This will be carried out with the guidance of the Kent and Medway Safeguarding Policies and Procedures.

If one of our DSLs decides that a referral should be made to Children's Social Care, where a child has suffered or is at risk of suffering significant harm, it will be made immediately. Parents/Guardians will be notified if a referral is made unless that would put the child at greater risk.

Staff should differentiate between children who are in need of additional support from one or more agencies and children who have suffered or are at risk of suffering serious harm. Children who have suffered or are at risk of suffering serious harm must be reported to children's social care immediately. Children who are in need of additional support from one or more agencies need to use the CAF (Common Assessment Framework) and "Team Around Child" (TAC) approaches.

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

If the member of staff reporting the concern does not feel it has been acted upon appropriately it is their responsibility to refer to Children's Social Care themselves.

Where students are identified as being at risk of radicalisation, the level of risk needs to be considered to identify the most appropriate referral, for example Medway Social Care or Channel, the programme that provides support to those vulnerable to radicalisation.

Particular attention will be given to the attendance and development of any child who has been identified as having a Designated Safeguarding Plan.

If a child changes school a copy of any records relating to Designated Safeguarding matters will be sent to the receiving school.

### **Dealing with a disclosure**

If a student discloses that he or she has been abused in some way, the member of staff should:

- listen carefully to what is being said without displaying shock or disbelief
- accept what is being said
- allow the student to talk freely
- reassure the student, but not make promises which they may not be able to keep
- never promise confidentiality, as it may be necessary to refer the information onwards
- reassure the student that what has happened is not their fault
- stress that it was the right thing to tell
- listen, rather than ask direct questions

- never ask leading questions; if possible avoid asking questions. Ask open questions if more information needed.
- not criticise the perpetrator
- explain what has to be done next and to whom this must be told

### **Record keeping**

When a student has made a disclosure, or when a concern is raised, the member of staff should:

- make brief factual notes as soon as possible after the conversation or observation
- attach the original notes to a 'Record of Concern' form in case they are needed by a court or other professional
- record the date, time, place, noticeable non-verbal behaviour and student's words used on the recording forms
- indicate on the body map the position of any bruising or other injury; no intimate areas of the body will be examined
- record statements and observations, rather than interpretations or assumptions

### **Allegations involving College staff**

Checks will be undertaken on all adults working in the school to establish the suitability of a person to work with children corresponding to Medway Council's Safe Recruitment procedures. Records of these checks will be kept in accordance with Keeping Children Safe in Education, Safer Recruitment Part 3; each recruitment selection group and interview panel will have a 'Safer Recruitment' trained member.

All school staff should take care not to place themselves in a vulnerable position with a child, such as when giving one-to-one tuition or sports coaching. It is always advisable for interviews or work with individual children or parents to be conducted with or in view of other adults. The College Staff Code of Conduct can be found in the Staff Handbook.

All staff understand that they are employed in a position of trust and that inappropriate behaviour with or towards children is unacceptable. It is an offence for a person in a position of trust to have a sexual relationship with a child under 18, even if the relationship is consensual. This applies where the child is in full-time education and the person works in the same establishment even if s/he does not teach the child. This is in accordance with the Sexual Offences Act 2003.

If a student, or parent, makes a complaint of abuse against a member of staff, the person receiving the complaint must take it seriously and immediately inform the Principal.

Any member of staff who has reason to suspect that a student may have been abused by another member of staff or volunteer, either at school or elsewhere, must immediately inform the Principal. A record of the concerns must be made, including a note of anyone else who witnessed the incident or allegation. If the Principal is the subject of an allegation refer to the nominated Governor, who will work with the Company Safeguarding Lead; the Principal should not be informed. If an allegation is made against the Governor report it to the Principal, who will discuss it with the DSL and the Company Safeguarding Lead. In case of serious harm or a crime being committed, the police should be notified from the outset.

The Principal will refer immediately and within 24 hours to the Local Authority Designated Officer (LADO) or the Safeguarding Co-ordinator (Education), Medway Council or the Safeguarding Team Children and Adults based at Gun Wharf, Dock Road, Chatham. The LADO provides advice and guidance to employers and voluntary organisations that have concerns about a person working or volunteering with children and young people who may have behaved inappropriately. If information has been received that may constitute an allegation the LADO will also preside over the investigation.

The Principal should not make his decision over what may appear to be a borderline case but should discuss any concerns with the LADO team, who can be contacted on 01634 331065. This may be done tentatively and without giving names in the first instance. If it is decided that it is not necessary to refer the matter on the Principal will consider whether there needs to be an internal investigation.

Where a member of boarding staff is suspended pending an investigation of a Safeguarding/Child Protection nature, arrangements for alternative accommodation away from students will be made.

Any person, whether employed, contracted, a volunteer or student, who is no longer at the College because they are considered unsuitable to work with children, will be reported to the Disclosure and Barring Service (DBS) within one month of leaving the College. Furthermore, the College will notify the National College for Teaching and Leadership of the details of any teacher who has been dismissed or left the College where there are concerns that a prohibition order may be appropriate.

All staff should be aware of their duty to raise concerns about the attitude and actions of colleagues. If necessary, they should consult with the LADO team on 01634 331065. See also Medway Council's Whistleblowing procedures. If you are unhappy with the response you have received please contact Office for Standards in Education or the Department for Education and Skills (0870 000 2288) or [complaints.peu@dfes.gsi.gov.uk](mailto:complaints.peu@dfes.gsi.gov.uk).

Any member of staff who reports a concern or allegation will be provided immunity from retribution or disciplinary action for 'whistleblowing' in good faith.

#### **Procedures for dealing with abuse by one student to another student**

The College seeks to promote an environment where students feel able to discuss their concerns with a member of staff. Situations involving student to student abuse will be taken very seriously, taking into account the needs of those involved under the guidance of the Designated Safeguarding Lead. Where a student is suspected of causing harm to another student the usual Designated Safeguarding procedures will be followed.

These instances may include online activity and sexting, and should not be passed off as just a normal part of growing up or banter. It can also include specific gender issues, such as girls being sexually touched or assaulted by boys or initiation-type violence. A bullying incident should be treated as a safeguarding concern where there is 'reasonable cause to suspect a child is suffering, or likely to suffer, significant harm', for example through violent or sexually abusive behaviour. In these cases concerns should be reported to the local authority social care department and, in the case of a serious or criminal allegation, the police. All children involved would be offered support through tutors, the College nurse and the DSLs, outside agencies and via independent counsellors where necessary.

With particular reference to sexting, whilst sharing photos and online content is part of daily life for young people, there are risks associated with the production and distribution of sexual images, not only relating to the law but also a young person's wellbeing, especially if the material is shared beyond their control. Staff should refer to the DSL any instances of sexting or suspicions of sexting. The student concerned is likely to be very embarrassed and anxious about the consequences and the situation must be dealt with sensitively.

Staff must not ask to view the image but confiscate the device on which the image is held and pass it on to the DSL who, in conjunction with the principal, will follow the guidance in 'Sexting in schools and colleges: responding to incidents and safeguarding young people'. Some but not all instances, according to this guidance, will need to be reported to the police and in cases where referral to outside agencies is not necessary designated staff will work with the student to support and re-educate them. In any event the sharing of sexual imagery of those under 18 by adults constitutes child sexual abuse and will therefore be referred to the police.

### **E Safety and internet and computing use**

PHSEE lessons and workshops from outside speakers can be used to teach students about being safe, both outside College and online, to reduce risks and build resilience, as well as the safe use of electronic equipment. Students should also understand the risks posed by adults or young people, who may use social media to groom, bully, abuse or radicalise others. DfE resources can be found at [www.saferinternet.org.uk](http://www.saferinternet.org.uk) and [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk). The College's Student Internet and Computing agreement outlines how the College ensures that students are able to use ICT, including the internet and related communication technologies, appropriately and safely. The College's policy on the prevention and management of bullying covers the issue of cyber bullying in some detail. The College plans to register on the Childnet Digital Leaders Programme and follow the 12 month programme in the Lower School for all students from January 2016.

### **Physical intervention/positive handling**

Our Physical Intervention policy states that staff may only use physical intervention as a last resort. We understand that physical intervention of a nature that causes injury or distress to a child may be considered under child protection or disciplinary procedures.

### **Anti-bullying**

Our policy on the prevention and management of bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

### **Health and safety**

Our Health and Safety Policy, set out in a separate document, reflects the consideration we give to the protection of our children both physically, within the school environment, for example in relation to internet use; and when away from the school, for example when undertaking school trips and visits.

### **Safe recruitment**

Our policy sets the vetting requirements for all staff who wish to work in our school whether paid or voluntary.

### **Whistleblowing**

As stated in the Whistleblowing policy the College requires any member of staff to report to the Principal if they have any concern or worry in relation to practices taking place in College. Staff who report such issues are protected by the College from retribution or disciplinary action. The NSPCC whistleblowing helpline number is in the list below.

### **Governance of Safeguarding**

The college Principal meets with Governors at least once every half term to report formally on safeguarding issues and to give Governors a safeguarding compliance update. The college provides the Governors and Company Safeguarding Lead with a written report every half term and an annual report.

### **Contacts**

Local Authority Designated Officer (LADO) team	01634 331065
Medway Safeguarding Children Board	01634 336 329
Medway Council Social Care	01634 334 466
Social Care Out of Hours' service	08457 626 777
Ofsted	08456 404 045
Independent Schools Inspectorate	0207 600 0100
Kent Police Medway Police Station	01622 690690
Non-emergency police number	101
DfE helpline	0207 3407264
<a href="mailto:Counter-extremism@education.gsi.gov.uk">Counter-extremism@education.gsi.gov.uk</a>	
NSPCC Whistleblowing helpline	0800 028 0285
Safeguarding Governor Glenn Hawkins	0207 290 1793; 07903 437438