

SAFEGUARDING POLICY

September 2020



ROCHESTER
INDEPENDENT COLLEGE

Designated Safeguarding Lead: Maeva Elliott, Vice Principal (Pastoral and Welfare) 01634 828115
Assistant Designated Safeguarding Leads: Kelly Flatman, Vice Principal; Ammy Bjerkan, College Nurse; Christopher Barradell, Assistant Head of Lower School; Ben Garton, Science Teacher and Head of Year 7 01634 828115.

Evenings and weekends (including during holiday time): Maeva Elliott 07495 742288

The College Proprietor is Dukes Education Group Limited.

The nominated governor with responsibility for Safeguarding is Tim Fish. He can be contacted at Dukes Education Group Limited, 14-16 Waterloo Place, London, SW1Y 4AR as well as by telephone on 0203 696 5300 or 01303 253951.

Paul Ludlow, Dukes Compliance Director acts as an advisor on safeguarding issues and supports the governors in compliance and quality assurance. He can be contacted at Dukes Education Group Limited, 14-16 Waterloo Place, London, SW1Y 4AR or by telephone on 07584 012130.

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. Should the College be operating differently as a result of coronavirus procedures will be adapted accordingly and this is detailed in the safeguarding addendum on the College website.

If a concern is brought to you by a colleague, student or parent concerning a student you must bring it to the attention of the DSL or one of the Assistant DSLs immediately.

If a concern is brought to you by a colleague, student or parent concerning a member of staff you must bring it to the attention of the Principal immediately.

If a concern is brought to you by a colleague, student or parent concerning the Principal you must bring it to the attention of the nominated Governor with responsibility for Safeguarding, Tim Fish, immediately and the Principal should not be informed.

If a concern is brought to you by a colleague, student or parent concerning a Governor you must bring it to the attention of the Principal 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 15. 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 incidents and behaviours can be associated with external factors and all staff, in particular the DSL, should consider whether a child is at risk of extra-familial abuse or exploitation.

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 2018 and Keeping Children Safe In Education September 2020. The Counter-Terrorism and Security Act 2015 places a duty on specified authorities to have due regard to the need to prevent people from being drawn into terrorism, known as the Prevent duty. Guidance and advice is available in the Prevent Duty Guidance for England and Wales (July 2015), The Prevent Duty: departmental advice for schools and childminders (June 2015) and The use of social media for online radicalisation (July 2015).

In response to the Children and Social Work Act 2017 and Working Together to Safeguard Children 2018, from September 2019 new local multi agency safeguarding arrangements will replace Local Safeguarding Children Boards. The local authority safeguarding partnership will consist of the local authority, clinical commissioning group within an area of the local authority and the chief officer of police for the police area within the local authority. It is their collective duty to make arrangements for safeguarding and promoting the welfare of children in the area. Medway's arrangements will be led by the three named statutory partners Medway Council, Kent Police and Medway Clinical Commissioning Group. The Medway Safeguarding Children Partnership replaces the Medway Safeguarding Children Board.

Safeguarding children is defined, according to Keeping Children Safe in Education 2020, as protecting children from maltreatment; preventing impairment of children's mental and physical 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. Children at potentially greater risk of harm include children who need a social worker, children who need mental health support, looked-after or previously looked-after children, care leavers and children with SEN/D. Working with external agencies will, where necessary, provide support for these children. There are clear powers to share information under existing duties on both local authorities and schools and

colleges to safeguard and promote the welfare of children. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. In cases of risk of harm children's social care services will be involved and it may be necessary to contact the police. The document 'NPCC- When to call the police' should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do. 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, personal 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 school leaders and staff working directly with children are required to read Keeping Children Safe in Education September 2020 part 1 and annex A and then sign to confirm they have done this. 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, including annexe A
- National Minimum Standards (boarding staff)
- Online safety
- Good behaviour and sanctions policy
- Safeguarding response to children who go missing in education

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, 2018' 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. Remember also that abuse can take place wholly online and that technology can be used to facilitate offline abuse. Sexual abuse of children may be committed by other 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. Children may be abused in a family, institution or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

Neglect

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

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

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.

Safeguarding issues

Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology.

Some of the following signs may be indicators of child sexual exploitation:

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

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also

occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE:

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

Honour-based abuse

So-called 'honour-based' abuse 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. Non-violent forms of abuse may also take place. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

Female Genital Mutilation

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Teachers should also 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

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach. Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Terrorism is a by-product of radicalisation. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a referral to the Channel programme.

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76 which are specifically concerned with schools. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: Channel guidance, and a Channel awareness e-learning programme is available for staff at: Channel General Awareness. The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Channel referral. As a Channel partner, the school or college may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

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. In addition, children who go missing or run away from home or care may be in serious danger and are vulnerable to crime, sexual exploitation or other types of harm, as well as missing education. 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 domestic violence, 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).

If a member of staff becomes aware that a child may have run away or gone missing, the DSL or ADSL should try to establish with the parents/carers, what has happened. If this is not possible, or the child is missing, the DSL would meet with the form teacher or personal tutor and assess the child's vulnerability.

Where the risk of harm is suspected, the DSL would consider a discussion with parents, if appropriate, reporting the child missing to the police and contacting Children's Social Care.

The College maintains a child missing education 'on-off' roll, which is submitted to Medway local authority within five days of the student joining or leaving. This includes the names of students who have joined or left the College at non-standard points in the academic year, for example if a child moves to or from the area and so changes schools. When a student leaves the College details of which school they have moved on to are recorded and checked with that particular school. If the new school confirms that the student is **not** on their roll the student is reported as a child missing education.

Domestic abuse

The cross-government definition of domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. Children may witness and be adversely affected by domestic abuse between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. The National Domestic Abuse Helpline and the police-led initiative Operation Encompass provide emotional and practical support to children affected by domestic abuse.

County lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years
- can still be exploitation even if the activity appears consensual
- can be perpetrated by individuals or groups, males or females, and young people or adults

- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Serious violence

Staff should be aware of indicators that may signal a child is at risk from or involved with serious violent crime. Signs may include increased absence from school, a change in relationships or friendship groups with those who are older, a significant decline in academic performance, signs of self-harm or significant change in wellbeing, signs of assault or unexplained injuries. Unexplained gifts or possessions may indicate that a child is involved with or has been approached by an individual associated with gangs.

Mental health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children 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. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

Safeguarding referrals should be considered in the above safeguarding issues.

Early help

Early help means providing help as soon as a problem emerges at any point in a child's life, from foundation through to the teenage years. All staff should be prepared to identify children who may benefit from early help. Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

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

- is a privately fostered child

Child in need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

Roles and responsibilities of the DSL

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
- share information with teachers and school leaders about the welfare, safeguarding and child protection issues that students have experienced with a view to better understanding how to best support these children in school.

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
- carry out an annual review for the governing body to assist them in their proprietorial oversight
- 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 the 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 (teachers and other staff, including supply staff and volunteers)

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 and in accordance with the Independent School Standards Regulations. 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, supply staff or volunteer, either at school or elsewhere, must immediately inform the Principal. 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 it must be reported to the Principal. Allegations or concerns that meet the harm test should be addressed under part 4 of Keeping Children Safe in Education 2020. In all cases of serious harm or a crime being committed, the police should be notified from the outset. A record of the concerns must be made, including a note of anyone else who witnessed the incident or allegation.

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.

When managing allegations against supply staff it is still the responsibility of the College to ensure they are dealt with appropriately, in conjunction with the agency and liaising with the LADO to determine a suitable outcome. The supply agency should be made aware of the College's process for managing allegations.

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, supply staff, 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 Teaching Regulation Agency 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.

Transferable risk from incidents arising outside of school where a member of staff has behaved or may have behaved in a way that indicates that the person may not be suitable to work with children (for example, involving domestic violence) should be considered by school leaders.

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.

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 peer on peer abuse

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, as well as sexual violence, sexual harassment (which can include sexual comments, remarks or jokes occurring in person or online and may be standalone or part of wider abuse), upskirting (which is now a criminal offence, the victim can be of any gender and typically involves taking a picture under someone's clothing, without them knowing, to view their genitals or buttocks for sexual gratification or to cause the victim harm or distress) and physical abuse. They 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 and humiliation (known as hazing). It can also occur in intimate partner relationships between peers. 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.

The initial response to a report of sexual harassment or sexual violence from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a child or a child makes a report to them, they should they should speak to the designated safeguarding lead (or a deputy). Victims should be offered full support and the designated safeguarding lead or assistant designated safeguarding lead will assess the matter on a case by case basis. This may include contacting social services, the police and managing the situation within the College setting.

The College ethos of mutual respect and tolerance and our expectations of behaviour are clearly outlined in our good behaviour and sanctions policy, as well as in PHSE lessons and also from the support given to students by form and personal tutors. Serious matters concerning peer on peer abuse would be considered a breach of our good behaviour policy and result in disciplinary action being taken. Staff training to deal with peer on peer abuse is ongoing.

Online safety and internet and computing use

PHSEE and Relationships and Sex Education lessons, as well as workshops from outside speakers, are 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. The DfE has released guidance, Teaching online safety in schools June 2019, outlining how schools can ensure that students stay safe and behave online as part of the requirements of the curriculum. DfE resources can be found at www.saferinternet.org.uk and 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. Lower School students have been involved in the Childnet Digital Leaders Programme and the DSL is a CEOP ambassador. The College's online safety policy gives information on filtering and information system security, as well as safe use of the internet and electronic devices.

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 company safeguarding lead on behalf of governors conducts a formal annual audit on safeguarding files, manages the DSL annual appraisal along with the college Principal and monitors and samples the SCR, staff recruitment and all safeguarding systems on a regular basis throughout the year. The company safeguarding lead meets on a regular basis throughout the year with the safeguarding team to discuss issues and to provide the team with support.

The college Principal and DSL meets with Governors at least once a term to report formally on safeguarding issues and to give Governors a safeguarding compliance update as well as providing an annual report on safeguarding.

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
Counter-extremism@education.gsi.gov.uk	
NSPCC Whistleblowing helpline	0800 028 0285
Safeguarding Governor Tim Fish	0203 696 5300

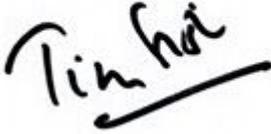
This policy has been authorised by the principal and the safeguarding governor:

Name of Principal: Alistair Brownlow

Signed: 

Date: 27 August 2020

Name of Safeguarding Governor: Tim Fish

Signed: 

Date: 28 August 2020