

Safeguarding and Child Protection Policy

To be read in conjunction with:

RSE policy and Remote Learning Policy

Approved by Board of Governors

Proprietor: Oxbridge College Ltd

Designated Safeguarding Lead: Anca Sitov

NB. 9a refers to safeguarding protocols for online teaching.

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Introduction

1. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes in contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

(Keeping Children Safe in Education, September 2021)

- 1.1 The purpose of this policy is to inform staff, parents, contractors, volunteers and governors about the College's responsibilities for safeguarding children and to enable all parties to have a clear understanding of how these responsibilities should be carried out. It applies wherever staff members are working with students – even where this is away from the College, such as on educational visits. Staff should be aware of and look out for any kind of abuse including peer on peer abuse; child criminal or sexual exploitation; the risk of online abuse; the sharing of nudes; and mental health concerns.
- 1.2 This policy is published on the College's website and is available to parents and prospective parents from the College's office on request. Large print or other accessible formats can also be made available.
- 1.3 The policy is drafted in accordance with all relevant legislation and the following statutory guidance:
 - Keeping Children Safe in Education September 2021 (KCSIE), particularly Part One and Annex B
 - Relationships Education, Relationships and Sex Education (RSE) and Health Education 2019
 - Working Together to Safeguard Children July 2018 (WTSC)
 - Prevent Duty Guidance for England and Wales July 2015
 - Disqualification Under the Childcare Act August 2018
 - Education (Independent School Standards) Regulations 2014
 - Oxfordshire Safeguarding Children's Board (OSCB) agreed inter-agency procedures
 - What to do if you are worried a child is being abused – advice for practitioners March 2015
 - Safeguarding children and young people October 2018
 - Departmental advice Sexual Violence and Sexual Harassment Between Children in Schools and Colleges

We follow the procedures of the **Education Safeguarding Advisory Team (ESAT)**. We are advised by the local Kingfisher Team: for Child Sexual Exploitation (CSE), whom the DSL regularly consults on safeguarding matters. Contact details are contained in Appendix 1.

- 1.4 Every complaint or suspicion of abuse from within or outside the College will be taken seriously and action will be taken in accordance with this policy.

2 Principles

- 2.1 Cherwell College (the 'College') is committed to safeguarding and promoting the welfare of all students in our care, and expects all staff, senior leadership team, governors and volunteers to share this commitment. To achieve this, the College seeks to create a safe learning environment and a strong pastoral system. Staff are trained to listen to students' concerns, identify issues early and respond appropriately following agreed procedures. The College will consider, at all times, what is in the best interest of the child.
- 2.2 Safeguarding and promoting the welfare of children is defined in this policy as:

- Protecting children from maltreatment
- Preventing the impairment of children's' mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable children to have the best outcomes

Children includes everyone under the age of 18 years.

2.3 The College will take all reasonable measures to:

- ensure that we practise safer recruitment in checking the suitability of staff, governors and volunteers (including staff employed by other organisations) to work with children and young people. Staff recruitment procedures are outlined in detail in the College's Safer Recruitment Policy.
- ensure that, where staff from other organisations are working with our students on another site, we have received confirmation that appropriate child protection checks and procedures apply to those members of staff and that any such checks do not raise any issues of concern in relation to the suitability of those staff members working with children
- follow the local inter-agency procedures of the **Education Safeguarding Advisory Team (ESAT)** and contribute to inter-agency working
- support students in need through early intervention and, where appropriate, support them in co-operation with multi-agencies who are working to the Common Assessment Framework (CAF) and as part of the Team around the Child (TAC) approach
- be alert to signs of abuse, both in the College and from outside and to protect each student from any form of abuse, whether from an adult or another student
- deal appropriately with every suspicion or complaint of abuse and support students who have been abused in accordance with their agreed child protection plan
- design and operate procedures which promote this policy, but which, so far as possible, ensure that tutors and other staff who are innocent are not prejudiced by false allegations
- be alert to the needs of students with physical and mental health conditions
- be alert on peer on peer abuse signs
- operate robust and sensible health and safety procedures
- operate clear and supportive policies on drugs, alcohol and substance misuse
- assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area
- identify children who may be vulnerable to radicalisation, and know what to do when they are identified
- take all practicable steps to ensure that College premises are as secure as circumstances permit
- teach students about safeguarding issues and about how to keep themselves safe, including online
- ensure that any deficiencies in our child protection and safeguarding procedures are remedied without delay.

The new 4Cs classification recognises that online risks arise when a child:

- engages with and/or is exposed to potentially harmful **CONTENT**
- experiences and/or is targeted by potentially harmful **CONTACT**
- witnesses, participates in and/or is a victim of potentially harmful **CONDUCT**

- is party to and/or exploited by a potentially harmful **CONTRACT/COMMERCE**.

 Content Child as recipient	Contact Child as participant	Conduct Child as actor	Contract Child as consumer	
Aggressive	Violent, gory, graphic, racist, hateful and extremist content	Harassment, stalking, hateful behaviour, unwanted surveillance	Bullying, hateful or hostile peer activity e.g. trolling, exclusion, shaming	Identity theft, fraud, phishing, scams, gambling, blackmail, security risks
Sexual	Pornography (legal and illegal), sexualization of culture, body image norms	Sexual harassment, sexual grooming, generation and sharing of child sexual abuse material	Sexual harassment, non-consensual sexual messages, sexual pressures	Sextortion, trafficking for purposes of sexual exploitation, streaming child sexual abuse
Values	Age-inappropriate user-generated or marketing content, mis/disinformation	Ideological persuasion, radicalization and extremist recruitment	Potentially harmful user communities e.g. self-harm, anti-vaccine, peer pressures	Information filtering, profiling bias, polarisation, persuasive design
Cross-cutting	Privacy and data protection abuses, physical and mental health risks, forms of discrimination			

The 4Cs classification also distinguishes between aggressive, sexual and value risks, as this is helpful in retaining a balanced view of the range of risks that children can encounter.

We note that risks to the values that shape childhood and society are increasingly prominent. In addition to the 4Cs, the new classification recognises important cross-cutting risks, notably to children’s privacy, health and fair treatment. These risks, we suggest, can occur in relation to any and all of content, contact, conduct and contract/commerce risks.

Importantly, it should be noted that, although some risks are particularly cross-cutting in nature, many of the online risks to children intersect and hybridise, depending on the circumstances, and more so as the digital environment evolves. Hence the classification and its exemplars are offered here as a way of organising and opening up further investigation, rather than as implying that risks are simple or disconnected.

Mental Health

Children requiring mental health support

Schools and colleges have an important role to play in supporting the mental health and wellbeing of their pupils.

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. Governing bodies and proprietors should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. The Department for Education (DfE) recognises that: “Schools have a role to play in supporting the mental health and wellbeing of children” (Mental Health and Behaviour in School, 2018). Schools can be a place for all students to experience a nurturing and supportive environment that has the potential to develop self-esteem and give positive experiences for overcoming adversity and building resilience.

Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

More information can be found in the mental health and behaviour in schools guidance, colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing, and resilience among young people. See Rise Above for links to all materials and lesson plans.

- Staff are 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 our appropriately trained professionals (Clinical Psychologist: Dr Nicola Smith) 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 diverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. 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 is taken, following the child protection policy and speaking to the designated safeguarding lead or a deputy.
- The College has policies on Preventing and Tackling Bullying, and Mental Health and Behaviour. *Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience.*
- Promoting children and young people's emotional health and wellbeing - resources include social media, forming positive relationships, smoking and alcohol.

3 Roles and responsibilities

Staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

College staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff always act in the best interests of the child.

3.1 All staff (including proprietors and volunteers)

All staff are under a general legal duty to:

- contribute to providing a safe environment in which children can learn
- attend appropriate safeguarding and child protection training on an annual basis or additionally as directed by the DSL
- be aware of indicators of the different forms of abuse and neglect
- assist children in need and to protect children from abuse, neglect, radicalisation and extremism
- be familiar with the College's policies pertaining to safeguarding and child protection procedures (see section 16.9) and follow them

- know how to access and implement the procedures, independently if necessary
- keep a sufficient record of any significant complaint, conversation or event
- report any matters of concern to the DSL or, where appropriate, to one of the key contacts in accordance with this policy and
- support social services and any other agencies following any referral.

3.2 Senior Students

Senior students need to be aware of the need to report allegations or suspicions of child abuse to the DSL. Children often tell other young people, rather than staff or adults, about abuse.

All Year 13 students (therefore including all students who hold a position of responsibility such as a Student Representative) are briefed on College procedures. Mental health issues are regularly discussed within the College and an open dialogue is encouraged and practised.

3.3 The Designated Safeguarding Lead (DSL)

The College has appointed Anca Sitov (Head of Boarding) as Designated Safeguarding Lead (DSL) and is a senior member of staff and member of the College leadership team.

- 3.4 The DSL takes lead responsibility for safeguarding and child protection (including online safety) and is the first point of contact for parents, students, staff and others if they have any concerns about safeguarding or child protection. The College also has Deputy DSLs, to ensure that there is always an appropriately trained and designated person in the College at all times. A full description of the responsibilities of the DSL is set out in Annex C of KCSIE (2021) but these can be summarised as follows:

Raise awareness

- provide support, advice and expertise on all matters concerning safeguarding
- encourage a culture among staff of listening to students that takes into account their wishes and feelings
- ensure this Policy is known, understood and used appropriately, and reviewed at least annually
- monitor the operation of this policy and regularly review and update the College's child protection procedures and their implementation, working with the governors as necessary
- ensure that all members of staff and volunteers receive the appropriate training on child protection, keep and maintain records of this training and ensure that staff are aware of training opportunities and the latest local policies on safeguarding.

Manage referrals

- advise and act promptly upon all safeguarding concerns reported to them
- refer cases of suspected abuse to the local authority children's social services and the Local Authority Designated Officer (LADO) where appropriate, support staff who make or consider making any such referrals and liaise with the local authority children's social services on behalf of the College as required
- refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make or consider making any such referrals
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service
- refer cases where a crime may have been committed to the police
- keep detailed, accurate, secure written records of concerns or referrals
- where appropriate, take part in child protection conferences or reviews by the local authority

- keep the Principal informed of all concerns and actions, especially ongoing enquiries under s47 Children's Act 1989 and police investigations
- monitor records of students in the College who are subject to a child protection plan, to ensure that they are maintained and updated as notifications are received
- monitor the confidentiality and storage of records relating to child protection and where a student leaves, ensure their child protection file is copied for the new College as soon as possible and transfer it separately from the main student file, ensuring secure transit and confirmation of receipt is obtained

Prevent

- understand and support the College with regard to the requirement of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation
- ensure that staff inviting visiting speakers to the College have completed the risk assessment form for them and complete the post-visit evaluation form.

3.5 Deputy Designated Safeguarding Leads (DDSL)

DDSLs are trained to the same standard as the DSL and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of students. In the event of a long-term absence of the DSL, a deputy will assume responsibility for all the activities described above. On a day-to-day basis, safeguarding activities may be delegated to a DDSL but ultimate lead responsibility for safeguarding and child protection remains with the DSL.

3.6 Principal

The Principal is responsible for ensuring that the procedures outlined in this Policy are followed on a day-to-day basis. To this end the Principal will ensure that:

- the safeguarding and child protection policy and procedures adopted by the governing body are implemented and followed by all staff
- the allocation of sufficient time, training, funding, support and resources necessary to enable the DSL and DDSLs to carry out their roles effectively is given, including the assessment of students and attendance at strategy discussions and other necessary meetings
- systems are in place for children to express their views and give feedback which operate with the best interests of the child at heart
- all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the College's Whistleblowing Policy
- students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online
- ensure safer recruitment procedures in line with KCSIE September 2021 are being adhered to
- they liaise with Local Authority Designated Officer (LADO) before taking any action and on an ongoing basis, where an allegation has been made against a member of staff or volunteer and
- they notify the Disclosure and Barring Service and, where appropriate, the Teaching Regulatory Authority of anyone who has harmed or may pose a risk to a child.

3.7 Proprietors

The Proprietorial Board (the 'Board') has overall responsibility to ensure compliance with child protection statutory requirements and actively promote the wellbeing of students. It is the role of the Board to provide scrutiny of Safeguarding Policy and practice. Members of the Board take seriously their responsibility to fulfil

their duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. To this end the Board ensures that:

- an effective, up to date child protection policy is in place and made available on the College's website
- other policies, as prescribed by KCSIE 2021, are in place and operational
- required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Register
- all staff receive safeguarding training in accordance with this Policy
- students are taught about safeguarding, including online safety
- the College's safeguarding arrangements take into account the procedures and practice of the **Education Safeguarding Advisory Team (ESAT)**
- the College contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of children are identified
- appropriate filters and monitoring systems are in place to keep children safe online; and
- the College reports to their local authority the removal of a student from the College roll in line with statutory and local authority guidance.

3.8 Safeguarding Board member

The Board have appointed a nominated Board member for safeguarding to take a lead in relation to responsibility for safeguarding arrangements. The nominated Board member:

- discusses safeguarding matters with the DSL at least once a term and more regularly if needed
- liaises directly with the local authority and/or partner agencies where appropriate
- undertakes an annual review of the College's safeguarding procedures on behalf of the Proprietors and submits a written report to the Board with recommendations for further improvements. The annual written report will typically consider: the effectiveness and implementation of relevant policies; staff safeguarding training; staff recruitment procedures; the handling of safeguarding issues; referral management; the contribution the College is making to inter-agency working; and the provision for teaching students how to keep themselves safe.

3.9 The nominated Director for safeguarding is Stephen Clarke. Contact details are set out in Appendix 1.

4 Key personnel

The DSL at the College is the Head of Boarding, Anca Sitov, who is a member of the Senior Leadership Team. If the DSL is unavailable, the role will be carried out by one of the Deputy DSLs: Helen Clarke or Katya Kryvonos who act as the College's Welfare Team. The DSL or Deputy DSLs are always available during the College's hours to discuss safeguarding concerns with staff, either in person or via telephone or email.

4.1 If the DSL and Deputy DSLs are unavailable, the role will be carried out by the Principal. Outside College hours and during out of term activities, a designated member of the Senior Leadership Team will assume temporary responsibility and the rota is available to all staff.

4.2 Contact details for all the above are contained in Appendix 1.

5 Staff training

5.1 Staff training encourages all members of staff to maintain an attitude of 'it could happen here' where any kind of abuse and neglect are concerned.

5.2 Induction training for all new members of staff, including temporary employees or volunteers, includes formal child protection training which covers:

- This safeguarding policy and related policies on Anti-Bullying, Cyber-Bullying; E-Safety, Mental Health and Wellbeing and Prevent*
- Part One and Annex B of KCSIE 2021*
- the role, identity and contact details of the DSL and Deputy DSLs
- policies on acceptable use of IT and online safety*
- the student behaviour policy*
- the College's safeguarding response to children who go missing from education
- the staff Code of Conduct*
- the College's policy on Whistleblowing*
- **Education Safeguarding Advisory Team (ESAT)** procedures.

* Copies of these documents will be provided either in paper form or electronically as part of the induction process and new staff will be required to sign a declaration confirming they have read and understood them. A proportional, risk-based approach will be taken to determine the level of information provided to temporary staff and volunteers.

College staff are trained to re-assure students that their concerns are taken seriously and they encourage students not to feel ashamed.

5.3 All staff will undertake appropriate child protection training which, in line with **Education Safeguarding Advisory Team (ESAT)** guidance, is updated every two years. In addition, all staff will receive safeguarding updates delivered through a combination of INSET, e-bulletin updates, and the completion of relevant e-courses on a regular basis and at least annually. Safeguarding training is coordinated by the DSL and includes online safety and Prevent training where appropriate.

5.4 All staff receive updated copies of the College policies referred to above and are required to confirm that they have read and understood them. In addition, Annex B of KCSIE 2021 is reissued to staff since this statutory guidance was updated by the DfE. Staff training provides an opportunity to check and consolidate their understanding of the policies. Staff can also access the policies and further reading in the Policies and Procedures folder on the College's database.

5.5 The College is continually focused on staff training so that it can respond to specific safeguarding concerns such as mental health, online safety, radicalisation, child sexual exploitation, child sexual violence and sexual harassment, and female genital mutilation.

5.6 The DSL and Deputy DSLs undertake training that is in accordance with locally agreed procedures to provide them with the knowledge and skills necessary to carry out their role. This training includes Prevent awareness training and will be updated every two years. They also refresh their knowledge and skills at regular intervals (*and at least annually*) by following developments in safeguarding to:

- keep abreast of best practice for promoting a culture of listening to children;
- remain up to date on the mechanics of inter-agency working as operated by the **Education Safeguarding Advisory Team (ESAT)**;
- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;

- have an up-to-date working knowledge of how local authorities conduct a child protection case conferences so they can contribute to these effectively when required to do so;
- be alert to the specific needs of children in need, those with special educational needs and young carers;
- understand and support the College with regard to the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation; and
- be able to keep proper written records of concerns and referrals.

5.7 Members of the Board receive training at least on a three-yearly basis to ensure they have the knowledge necessary to discharge their collective responsibility to exercise appropriate oversight over the College safeguarding policies and procedures.

6 Hierarchy of intervention

6.1 The Education Safeguarding Advisory Team (ESAT) **provides guidance** that all agencies, professionals, and volunteers in the borough can use to consider how best to meet the needs of individual children and young people. This guidance provides a summary of thresholds for intervention in relation to a continuum of need, ranging from children who need no additional intervention to those who require intensive help and specialist support. Children's needs are not static, and they may experience different needs – at different points on the continuum – throughout their childhood years.

6.2 Within the continuum, there are four levels:

Level 1: Children with no additional needs

These are children whose health and developmental needs will be met by universal services such as housing, mainstream education, primary health care, community resources alone. Children and young people at this level are achieving expected outcomes. There are no identified unmet needs, or the need is at a low level and can be met by the universal services or with some limited additional advice or guidance. Children, young people, parents and carers can access these services directly.

Level 2: Children requiring early help

These are children whose needs are not clear, not known or not being met. They may be vulnerable and showing early signs of abuse and/or neglect. Children and young people at this level need coordinated early help and support from services.

Level 3: Children in need

These are children with high-level additional unmet needs. They are unlikely to achieve or maintain a satisfactory level of health or development, or their health and development will be significantly of further impaired, without the provision of services.

Level 4: Children at risk

These are children who are suffering or are likely to suffer significant harm. This is the threshold for child protection. These children are likely to have already experienced adverse effects and to be suffering from poor outcomes.

There are 3 further guidance documents available:

- **Neglect Practice Guidance June 2017**: This twelve-page document includes standard practice guidance alongside sections on disabled children, 'one child singled out' and neglect by secondary carers
- **Oxfordshire Neglect Pathway 2017**: The Oxfordshire Neglect Pathway and Identification and Intervention Overview is a two-page document that provides an overview of available resources and support to identify and address neglect.

- **Neglect: A Guide for Oxfordshire Practitioners 2018:** This five-page document includes tips for assessment and chronologies, brief guides to home visits, direct work with children and one-to-one visit with parents, and a list of tools and interventions.

7 Early help

- 7.1 The College recognises the importance of providing early help to students to provide support for a problem as soon as it arises, to prevent it from escalating. We recognise that young people may face many challenges that put them in need of support and ensure that staff are aware of them. These include stress, peer pressure, body image concerns, anxiety and relationship issues.
- 7.2 Students are encouraged to raise concerns as soon as they are identified, either to their class tutor, the academic team or directly to the Designated Safeguarding Lead, so that effective early support can be provided.

Staff are aware that a student could benefit from early help and know that that they should discuss the matter with the DSL.

Staff are made aware that the DSL will take into account the **Education Safeguarding Advisory Team (ESAT)** threshold criteria and consider what action should be taken – if necessary will refer to Children’s’ Social Care.

- 7.3 If early help is provided, the situation will be monitored carefully and a referral to children’s social services made if the student’s situation does not appear to be improving.
- 7.4 The College has various mechanisms to help identify emerging problems, including thorough student and staff recruitment processes, the College’s pastoral system, the PSHE programme and various policies, including Anti-Bullying, E-Safety, Mental Health & Wellbeing, and Prevent.

Staff training also prepares staff to identify children who might benefit from early help.

- 7.5 The College recognises the increased vulnerability of young people to whom any or all of the following apply:
- They are disabled or have special educational needs.
 - They do not have English as a first language.
 - They are living away from home for the first time.
 - They are looked after children.
 - They are acting as a young carer.
 - They are showing early signs of abuse or neglect.
 - They may be subject to discrimination and maltreatment on the grounds of race, religion, ethnicity, sexual orientation or sexual identity.
 - Peer group isolation
 - Prejudice-based bullying

Such children may be more likely to need early help.

Also, recognising abuse or neglect may be more difficult for these children for many reasons, including:

- assumptions that indicators of possible abuse such as behaviour, mood or injury relate to a student’s disability without further exploration
- that students with special educational needs or disabilities can be disproportionately impacted by bullying without outwardly showing any signs

- communication barriers and difficulties overcoming these barriers
- a disabled child's understanding of abuse.

College staff are trained to re-assure students that their concerns are taken seriously and they encourage students not to feel ashamed.

8 What to look out for and when to be concerned

- 8.1 All staff should be aware of the types and signs of abuse and neglect so that they are able to identify students who may be in need of help or protection. If staff are unsure, they should always speak to the DSL.
- 8.2 Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. 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.
- 8.3 Staff should be aware of the four main categories of child abuse which are commonly identified:
- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, 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 cyber-bullying), 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:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily 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.
 - **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing or 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.

Serious bullying is a form of abuse and therefore will be treated as a child protection concern if there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm.

8.4 Other forms of abuse which staff should be aware of are:

- Children missing from education
- Child sexual exploitation (CSE)
- Child criminal exploitation (county lines)
- Domestic abuse
- Honour-Based Violence (HBV) and Female Genital Mutilation (FGM)
- Forced marriage
- Radicalisation
- Peer-on-peer
- Sexual violence and harassment (including 'upskirting')

These are defined more fully in Appendix 3 and further information is contained KCSIE September 2021.

8.5 Children potentially at greater risk of harm

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs.

Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Findings from the Children in Need review, 'Improving the educational outcomes of Children in Need of help and protection' contains further information; the conclusion of the review, 'Help, protection, education' sets out action Government is taking to support this.

9 Signs of abuse

9.1 Possible signs of abuse include the following (but are not limited to and do not necessarily mean that abuse is occurring):

- the student discloses that he or she has been abused, or asks a question which gives rise to that inference
- a student's injury cannot be reasonably or consistently explained, or is unusual in type or location
- a pattern or frequency of injuries is emerging
- the student engages in extreme or challenging behaviour or there is a sudden change in the student's behaviour
- the student asks to drop subjects with a particular tutor and seems reluctant to discuss reasons

- the student appears neglected (e.g. dirty, hungry, inadequately clothed)
- the student appears reluctant to return home or has been openly rejected by parents or guardians
- the student's development is delayed in terms of emotional progress
- the student withdraws emotionally – showing a lack of trust in adults
- the student shies away from being touched or flinches at sudden movements
- the student loses or gains weight

Further guidance is provided in Appendix 3. Other sources of information on the signs of abuse include: the **Education Safeguarding Advisory Team (ESAT)**; the DfE advice note *What to do if you're worried a child is being abused* (2015); and the NSPCC website.

9a Online teaching

Predominantly, due to the Covid-19 pandemic and the subsequent 'lockdown' of the College buildings, the College introduced online teaching for students to ensure that they received continuing education.

Online teaching will continue for those students (parents) who opt for this style of teaching instead of face-to-face contact with staff members and tutors, if a request is made by students and parents.

The College will utilise Microsoft Teams as the platform to deliver online teaching. *Only College email addresses are to be used for communications.*

However, safeguarding and child protection is paramount in all methods of teaching.

As part of this process, Cherwell College ensures the College has appropriate filters and monitoring systems in place.

Our DSL will monitor online teaching and students are advised to contact the DSL if they have any concerns (**+44 7799 578307; Anca@cherwell-college.co.uk**). The contact details of the LADO remain available (01865 815956 or 07833 436649).

The 'virtual lessons' will also be observed by the Director of Studies, the Exams Officer, Senior College Administrator and the Vice-Principal to ensure that students are safeguarded in accordance with the protocols of this policy.

10 Listening to students and record keeping

The College provides a range of opportunities for students to be listened to. These include: the opportunity to meet for one to one sessions; daily interactions with the Head of Boarding, Welfare Team and Academic Team; house forums; the College counsellors (Clinical Psychologist; Educational Psychologist; Occupational Therapist; Independent Counsellor; Speech and Language Therapist; GP/Health Centre team; and annual pastoral surveys.

10.1 Contact details for the Children's Commissioner and the NSPCC are available on posters in all houses, as are details about the College counselling service and Health Centre.

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

- immediately stop any other activity to listen;
- listen carefully to the student and keep an open mind - do not interrupt the child or be afraid of silences;
- limit the questioning to the minimum necessary for clarification using "what, when, how, where" but avoid using leading questions such as, "has this happened to your siblings?" which may prejudice an investigation;
- not make any attempt to investigate the incident themselves or make a decision as to whether or not the student has been abused;

- reassure the student, but never promise not to tell anyone. Instead, explain who has to be told to ensure that proper action is taken in accordance with this policy;
- discuss the conversation with the DSL as soon as possible and take no further action unless instructed to do so by the DSL or the Principal;
- only share information on a need-to-know basis; and
- make a full written record of the conversation as set out below.

10.3 Staff must record in writing all concerns, discussions and decisions made about a child as soon as possible on a cause of concern form (see Appendix 6). The recording must be a clear, precise and factual account of the conversation or observations. Where a student has made a disclosure, the record must include details of:

- its date, time and place
- what was said and done by whom and in whose presence
- any noticeable non-verbal behaviour or words used by the child.

The record should be signed by the person making it, using names, not initials. Any other evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers) must be kept securely and passed on to the DSL as soon as possible. No copies should be retained by the member of staff or volunteer.

11 Procedure to be followed by staff if they have concerns about a student's welfare

11.1 Safeguarding incidents and/or behaviours can be associated with factors outside the College. All staff, but especially the designated safeguarding lead (or deputy), should consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding. In practice this means assessments of students should consider whether wider environmental factors are present in a student's life that are a threat to their safety and/or welfare. Children's social care assessments must consider such factors so it is important to provide as much information as possible as part of the referral process.

11.2 If a member of staff has concerns about a student's welfare, they must inform the DSL as soon as possible, unless the concerns involve an allegation against a member of staff, in which case the procedures set out in the section *Allegations against members of staff and volunteers* below should be followed.

11.3 All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSL.

11.4 When a child is not considered at risk of harm, but still has an unmet need that could mean they are in a Child in Need, a referral should be made by the DSL to Children's Social Care. Parental consent for referrals of this type is not required in these circumstances. However, it is best practice for such concerns to be discussed first with parents and any subsequent referral to be made transparently with their knowledge.

11.5 If a student is in **immediate danger** or is at **risk of harm**, a referral should be made to children's social services and/or the police **immediately**. Anyone can make a referral, although if a referral is made by someone other than the DSL, the DSL should be informed as soon as possible.

11.6 If a tutor discovers that an act of female genital mutilation (FGM) appears to have been carried out on a girl under 18, the tutor **must** report this to the police. Unless the tutor has a good reason not to, they should also still inform the DSL. This statutory duty does not apply to suspected cases of FGM or those at

risk of FGM, which should both be addressed in accordance with the safeguarding procedures described in this policy. (For further details, see Annex A of KCSIE and '[Guidance for Schools](#)' information).

11.7 The normal safeguarding procedures outlined in this Policy must be used when there are concerns about children who may be at risk of being drawn into terrorism.

11.8 Parents can report to the DSL on the welfare of any student in the College, whether their own child or not. If preferred, parents may discuss concerns in private with the student's tutor or other member of staff, who will notify the DSL.

11.9 Any member of staff may refer a matter to children's social services directly. This could happen in exceptional circumstances such as in an emergency or if there is a genuine concern that appropriate action has not been taken.

12 Duties of the DSL on being notified of a concern about a student's welfare

12.1 When the DSL is notified of any concerns about a student's welfare, she will decide on the appropriate course of action. In particular, the DSL will decide whether a referral should be made to children's social services.

12.2 Factors that the DSL should bear in mind when making their decision include:

- the best interests of the child
- the nature and seriousness of the complaint
- contextual factors
- the referral threshold set by **the Education Safeguarding Advisory Team (ESAT)**
- the child's wishes or feelings
- the inter-agency procedures of the Local Safeguarding Children Board
- where relevant, local information sharing protocols relating to Channel referrals.

12.3 If the DSL decides not to make a referral, but to support the student with early help, the DSL will keep the situation under review and consider a later referral to children's social services will be made if the student's situation does not appear to be improving.

13 Making a referral to children's social services

13.1 If a student is **NOT** in immediate danger or at risk of suffering harm but is in need of additional support from one or more agencies, the DSL will make a referral to children's social services in the Local Authority in which the child lives.

13.2 If the initial referral is made by telephone, the DSL should confirm the referral in writing. Confirmation of the referral and details of the decision on what action will be taken should be received from the Local Authority within one working day. If this is not received, the DSL should contact children's social services again.

13.3 If the DSL is not sure whether a referral should be made, she will consult with children's social services on a no-names basis. However, if at any stage sufficient concern exists that a student may be at risk of harm or in immediate danger, a referral to children's social services and/or the police will be made immediately.

13.4 If the referral is made by a member of staff other than the DSL, the DSL should be informed as soon as possible that a referral has been made.

13.5 The College is not required to obtain parental consent prior to a referral being made to statutory agencies.

13.6 If, after a referral, the student's situation does not appear to be improving, the DSL should contact children's social services again to follow the matter up and ensure that their concerns are addressed, and the student's situation improves.

13.7 Where relevant, the College will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The College will respond to requests for information from the police promptly and in any event within five to ten working days.

13.8 Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) there should be an inter-agency early help assessment and procedures will be put in place by children's services to arrange this. The College will coordinate with the local agencies involved.

14 Informing parents

14.1 Parents will usually be informed of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult with the Local Authority Designated Officer, children's social services, the police and/or the Principal before discussing details with parents.

14.2 For Channel referrals, the DSL will consider seeking the consent of the student (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

14.3 When the College decides to refer a particular complaint of abuse to social services or the police, the parents/guardian and student will be informed in writing of their right to make their own complaint or referral to social services or the police, where appropriate, and will be provided with contact names, addresses and telephone numbers.

14.4 For the avoidance of doubt, referrals do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents' wishes.

15 Allegations about member of staff and volunteers

15.1 Guidance to staff

Guidance is given to staff to be circumspect about placing themselves in situations which may

- put themselves or their students at risk of harm; or
- give rise to allegations of abuse.

To reduce the risk of allegations, staff should be aware of safer working practices and should be familiar with the detailed guidance on acceptable behaviour and actions contained in the Staff Code of Conduct, which is issued to all staff. Particular care should be taken where staff have one-to-one meetings with a student.

15.2 The following procedures will be used where it is alleged that a member of staff, supply staff or volunteer has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or

- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.

These procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. The procedures below are those prescribed in Part four of *KCSIE*.

15.3 Reporting an allegation about staff

If an allegation is made about staff, supply staff or volunteer and contractors that appears to meet the criteria in paragraph 15.2:

- The matter should be reported immediately to the Principal or, in the Principal's absence, a member of the board of governors. The adult to whom the allegation relates should not be informed without the explicit consent of the LADO.
- The Principal when he receives any such allegation is referred to in these procedures as the 'case manager'.
- For supply staff, the agency will be kept fully informed and involved.
- Allegations about the DSL or the Principal or the Vice-Principal should be reported to LADO **without first notifying either the DSL or the Principal or the Vice-Principal**. *A member of the Board of Governors will act as liaison with the LADO.*

15.4 Action to be taken by the case manager

- If the case manager is unsure whether the allegation meets the criteria in para 15.2 above, the LADO will be consulted for advice.
- Any allegations not meeting the criteria in para 15.2 will be dealt with in accordance with Oxford Safeguarding Children Board's procedures. All such allegations must be dealt with as a priority so as to avoid any delay.
- The case manager will immediately (and in any event within one working day) discuss the matter with the Local Authority Designated Officer (LADO) – the person designated by the local authority to be involved in the management of allegations against people who work with children - **before** further action is taken. The case manager may also consult with the DSL, but no attempt will be made to investigate the allegation until the LADO is consulted. The purpose of the initial discussion between the case manager and the LADO is to consider the nature, content and context of the allegation and agree a course of action. All discussions with the LADO should be recorded in writing.
- The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it will be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom.
- In situations where a person is deemed an immediate risk to children or where there is evidence of a possible criminal offence, the case manager may, in consultation with the LADO, request police involvement from the outset.
- Allegations against a tutor who is no longer teaching and historical allegations will be referred to the police.

15.5 Disclosure of information

- The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted.

- The parents of the student involved will be informed of the allegation as soon as possible if they do not already know of it, although where external agencies are involved, the case manager will not inform the accused or the parents until it has been agreed what information can be disclosed. Parents will be kept informed of the progress of the case, including the outcome of any disciplinary process.
- The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

15.6 Investigation

- Allegations about safeguarding are usually conducted by external agencies such as social services or the police rather than by the College. In some cases, the LADO may ask for further enquiries to be made before a formal decision is reached about how to proceed. When this occurs, the LADO will provide specific guidance as how and by whom the investigation should be conducted.
- Where an external agency is conducting the investigation rather than the College, the College will cooperate fully with external investigators. No internal investigation into possible breaches of the College's disciplinary code will commence until any external investigation or criminal proceedings are complete.
- In accordance with DfE statutory guidance, the following definitions will be used when determining the outcome of allegation investigations:
 - Substantiated: there is sufficient evidence to prove the allegation
 - Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
 - False: there is sufficient evidence to disprove the allegation
 - Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
 - Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

15.7 Support

- The College has a duty of care towards its employees and will ensure that effective support is provided for anyone facing such an allegation. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available.
- Support will also be offered to the student(s) affected and their parents/guardians. The College will consult with the children's social services, or the police as appropriate, as to how this can be done in the most appropriate and effective way.

15.8 Suspension

- Suspension will not be an automatic response to an allegation and will only be considered in a case where there is cause to suspect a student or other students at the College is or are at risk of significant harm or the allegation is so serious that it might be grounds for dismissal. The College will consider whether the result that would be achieved by suspension could be obtained by alternative arrangements, such as redeployment. A member of staff will only be suspended if there is no reasonable alternative. The College will balance the need to ensure the safety and welfare of the student with the need for a full and fair investigation. The LADO will be consulted as to the appropriate action to take.
- If suspension is deemed appropriate, the reasons and justification will be recorded by the College and the individual notified of the reasons for the suspension. The College will ensure that the suspended person is given the contact details for the representative who has been appointed to keep him or her informed about the progress of the case.

- If it is decided that the person who has been suspended should return to work, the College will consider how to facilitate this; for example, whether a phased return would be appropriate. The College may provide a mentor and will also consider how to manage contact with the student who made the allegation.
- If the allegation is against a member of the residential boarding staff (such as a Housemaster/Housemistress; Welfare Officer) and that member of staff is suspended from duty as a result of the allegation, the College will provide alternative accommodation for that member of staff for the duration of the investigation.

15.9 Confidentiality

- The College will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality to ensure a fair investigation with minimum impact for all parties.
- A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal offence to publish information that could lead to the identification of a member of staff who is the subject of an allegation before they are charged with an offence. Publication includes any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public.

15.10 Malicious allegations

- If an allegation by a student is shown to have been deliberately invented or malicious, the Principal will consider whether to take disciplinary action against the student in accordance with the College's Behaviour and Discipline Policy.
- If a parent has made a deliberately invented or malicious allegation the Principal will consider whether to require that parent to withdraw their child or children from the College, on the basis that they have treated the College or a member of staff unreasonably.
- Whether or not the person making the allegation is a student or a parent (or other member of the public), the College reserves the right to contact the police to determine whether any action might be appropriate.

15.11 Record keeping and references

- Details of allegations that are found to be malicious will be removed from personnel records. For all other allegations, a comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken will be kept on the employee's file. A copy of this summary will be provided to the individual concerned. Such records will be retained at least until the employee reaches the normal pension age (or for a period of ten years from the date of the allegation, if this is longer).
- Allegations that are proven to be false, unsubstantiated or malicious will not be referred to in any reference provided by the College.

15.12 Dismissals and resignations

- If an allegation is substantiated and the member of staff, supply staff, or volunteer is dismissed because they are unsuitable to work with children, or would have been had the person not resigned, a settlement agreement (sometimes referred to as a compromise agreement) will not be used and a report to the Disclosure and Barring Service will be made promptly and in any event within one month of the person leaving the College.
- Any such incidents will be followed by a review of the safeguarding procedures within the College, with a report being presented to the governors without delay.

- If a member of staff, supply staff or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the College in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible (within one month) if the criteria for referral are met.

If a tutor has been dismissed, or would have been dismissed had they not resigned, in cases involving unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction for a relevant offence, the College will give separate consideration to whether a referral should be made to the Teaching Regulatory Agency.

The College will follow the advice set out in the TRA documents Teacher misconduct: information for teachers and Teacher misconduct: the prohibition of teachers (as updated from time to time) to decide whether a referral should be made.

15.13 Low level concerns

As part of the whole Cherwell College approach to safeguarding, Cherwell College promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language

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

Such concerns, including those which do not meet the harm threshold are shared responsibly and with the right person, and recorded and dealt with separately and appropriately.

Sharing low-level concerns

Low-level concerns about a member of staff, supply staff, volunteer or contractors should be reported immediately to the College Principal.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Recording low-level concerns

All low-level concerns will be recorded in writing.

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

References

Cherwell College will only provide substantiated safeguarding allegations in references.

Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance

Responding to low-level concerns

If the concern has been raised via a third party, the Principal should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously
- to the individual involved and any witnesses.

The information collected will help the Principal to categorise the type of behaviour and determine what further action may need to be taken.

All of this needs to be recorded along with the rationale for the decisions and action taken.

Where a pattern of behaviour is identified, the College will decide on a course of action.

This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met.

Cherwell College will look into any possible wider cultural issues that might have been enabled the behaviour to occur and if appropriate will revise policies or will arrange training to be delivered.

16 Arrangements for dealing with peer-on-peer abuse and allegations

16.1 Cherwell College will not tolerate any kind of Peer-on-Peer abuse. Peer-on-Peer abuse will be dealt as a Safeguarding issue and all staff should be aware that safeguarding concerns can arise as a result of conduct by a student towards another (referred to as peer-on-peer abuse). Examples of students' conduct towards each other that could raise safeguarding concerns are:

- bullying (including cyberbullying)
- physical violence such as hitting, kicking, biting etc
- sexual violence
- sexual harassment
- "Up-skirting" (typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification, or to cause humiliation or distress. "Up-skirting" is now a criminal offence.)
- youth produced sexual imagery (nude and semi-nude images)
- initiation/hazing types of violence and rituals.
- Peer group isolation
- Prejudice-based bullying

16.2 Peer-on-peer abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

Peer-on-peer abuse might be taking place even though it is not apparent – staff need to be diligent e.g.:

- Child abduction
- Modern slavery
- Students whose parent(s) are in prison

- Abusive intimate relationships between peers
- Causing a peer to engage in sexual activity against their wishes
 - Touching, groping, kissing, photographing etc

16.3 Students with Special Educational Needs or Disabilities are particularly vulnerable to peer-on-peer abuse.

16.4 Sexual violence and sexual harassment can occur between students of any age and sex. However, staff should be aware that some groups are at greater risks than others. Girls, students with SEND, and LGBT students are more likely to be victims of these types of abuse. Sexual violence includes acts such as sexual assault, assault by penetration, and rape. A key feature of such acts is that the sexual activity takes place without the consent of the victim. Consent can only be given if an individual has the freedom and capacity to choose to participate in a sexual act.

16.5 Sexual harassment refers to ‘unwanted conduct of a sexual nature’ and can occur online and offline. Sexual harassment can take a wide variety of forms:

- Sexual comments e.g. making lewd comments or sexualized remarks about a person’s clothes or appearance, using sexualised names etc
- Physical behaviour e.g. deliberately brushing against someone, interfering with clothing (flicking bra straps, lifting up skirts etc), displaying pictures, drawings or photos of a sexual nature
- Online harassment e.g. non-consensual sharing of images and videos, unwanted sexualised comments and messages

16.6 The College has an important role in developing students’ understanding of what constitutes peer-on-peer abuse and instilling behavioural norms that minimise the risk of it taking place.

All abuse of this nature is unacceptable and will be taken seriously: Abuse is Abuse and will not be tolerated.

With this in mind, staff should be aware of the importance of:

- enforcing the College’s rules which are explicit about the high standards of behaviour and courtesy the College expects
- implementing in a consistent way its Behaviour Policy
- being clear that sexual violence or sexual harassment is abusive behaviour and cannot be dismissed as ‘banter’, ‘just having a laugh’, or ‘boys being boys’, or ‘girls being girls’.
- implementing the College’s anti-bullying strategy

Other strategies in place to prevent the occurrence of peer-on-peer abuse include:

- providing developmentally appropriate PHSE lessons which develop students’ understanding of acceptable behaviour. Themes covered in these lessons that are particularly relevant to peer-on-peer abuse include: consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships
- having systems in place to for any students to raise concerns with staff, knowing that they will be listened to, believed and valued
- delivering targeted work on assertiveness and keeping safe for those students identified as being potentially vulnerable
- having robust supervision arrangements, particularly for those in the boarding community

16.7 If an allegation or concern of peer-on-peer abuse has been made the DSL must be informed as soon as possible. Where the DSL considers that the behaviour meets the local authority threshold criteria, the case will be referred to the local authority using the procedures set out in this policy. The College will

take advice from children's social services on when and how to inform the student about the allegations and how the investigation of allegations should be conducted. It will also take all appropriate action to ensure the safety and welfare of all students involved including those accused of abuse. Further details on how cases of peer-on-peer abuse will be managed is contained in KCSIE 2021.

16.8 A student, against whom an allegation or concern of abuse has been made, may be suspended during the subsequent investigation and the College's policies on behaviour and discipline will apply.

16.9 If it proves necessary for a student to be interviewed by the police in relation to allegations of abuse, the College will ensure that, subject to the advice of children's social services, parents are informed as soon as possible and that an appropriate adult supports the student during the interview. If a student's parents are abroad, the student's education guardian will be asked to support the student and to accommodate him or her if they have been suspended.

16.10 Both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. The DSL as part of these procedures will produce a welfare risk assessment which will consider the needs of all those involved (victim, perpetrator and other students at the College) and the measures that need to be taken to protect and keep them safe. When compiling the risk assessment appropriate weight will be given to: the wishes of the victim; the nature of the alleged incident; the ages of those involved; whether the incident was an isolated one or part of a pattern; any power imbalance between the victim and perpetrator; any ongoing risks to the victim and other students; and any relevant contextual factors. Children's social services will independently risk assess the situation and any report produced by them will be used to inform and update the College's own risk assessment which, in any event, will be reviewed on a regular basis. Victims will never be made to feel as they are creating a problem for reporting abuse, sexual violence or sexual harassment.

17 Other safeguarding arrangements

17.1 Teaching students to keep themselves safe

The College is committed to educating students about how to stay safe, based on a wide view of what may happen to students, not only in College but also in the wider world. These are explored in a variety of contexts, including Relationships and Sex Education lessons, assemblies, academic and PSHE lessons. Issues covered include online safety (cyber-bullying and sexting), radicalisation, grooming, child sexual exploitation, healthy relationships, mental health, substance misuse and bullying. Students are also taught how to identify risks and how to modify their behaviour to mitigate these risks. Staff are aware of the ongoing need to promote fundamental British values as a means of building resilience to the risks of radicalisation. Resources are provided to students when they join the College (*Student Handbook, Acceptable use of IT Policy and Mental Health and Welfare*) and copies of these are all readily available in College.

The safe use of technology is a focus in all areas of the curriculum and key ICT safety measures are routinely reinforced in lessons and assemblies and at pastoral events. The College has an Acceptable Use of IT policy. It manages access to the internet via 3G and 4G through the use of filters and monitoring systems to ensure IT is being used in a safe and appropriate manner.

17.2 Mobile phones and cameras

The College provides mobile phones to staff for trips and cameras for taking photographs when necessary. Mobile phones should not be used when supervising or teaching children except in cases of emergency. Images of children must not be taken or stored on any personal mobile phone. If a phone is to be used for College blogs or Twitter whilst on educational visits, permission must be obtained from the Principal and reference to their use and subsequent safety of data must be referred to in the trip risk assessment.

Photographs and videos are taken of students by staff for a variety of purposes, including displays of work/activities, personal records of achievement and for the College website and newsletter. Written permission is obtained when a child joins the College and this also indicates the level of consent, including where images may be used (personal records only or personal records and on the College website or in College publications). The DSL will ensure that all staff are aware of the names of children who may not be photographed or where there is limited consent. Images of students on the website will not be named. Images may only be captured on College cameras and the images may only be stored on those cameras and on the College's password-protected computers. Once images have been transferred from a camera onto a computer the images should be deleted from the camera immediately. Additional copies may be stored on flash drives but these must be stored securely in a locked cupboard. Images must not under any circumstances be transmitted over the internet. Personal mobile phones may not be used to photograph students.

When taking photographs or recording video footage, staff should have regard to the following guidance:

- all Students must be appropriately dressed
- use photographs that represent the diversity of students participating
- do not use images that are likely to cause distress, upset or embarrassment
- do not use images of a student who is considered vulnerable, unless parents/guardians have given specific written permission
- photographs must not be taken in the cloakroom/toilet areas.

The SLT will review (at least annually), stored images and delete unwanted and out of date material.

Parents/guardians should be made aware of the need for sensitivity and respect when filming/photographing events featuring their own child or children. Staff should monitor the use of cameras at these events and ask anyone behaving inappropriately to cease filming/taking photos.

17.3 Safer recruitment

All prospective members of staff undergo DBS checks and will also be subject to the other checks required under the Education (Independent School Standards) Regulations 2014 and in accordance with the latest version of KCSIE (September 2021). At least one member of any staff recruitment panel will have had Safer Recruitment training. The College's separate **Safe Recruitment Policy** contains further details about how the process of staff recruitment is conducted.

17.4 Students missing education procedures

All staff are aware that a student going missing, particularly repeatedly, is a potential indicator of a range of safeguarding issues such as: neglect, sexual abuse or exploitation, child criminal exploitation, mental health problems, substance abuse, travelling to conflict zones, female genital mutilation or forced marriage. The College has clear procedures in place for following up on unexplained absences and, where necessary, reporting to the local authority students who are missing from College for more than 10 school days (continuous). The procedure includes the requirement to record any incident, the action taken, and the reasons given by the student for being missing.

The College has a legal duty to inform the Local Authority if a student is to be removed from the roll at a non-standard transition point; i.e., where a compulsory school-aged student leaves the College before completing the College's final year. This notification will be made at the point the student's name is taken off the roll. When this notification is made the College is required to provide the following information: full name of the student; name, address and telephone number of the parent the student lives with; details of any new address for the

student and parent; the name of the student's destination school and expected start date; and the reason why the student is leaving the College.

The College is also legally required to notify the Local Authority within five days of adding a student's name to the admissions register at a non-standard transition point. The notification includes all the details contained in the admissions register for the new student; specifically, their full name; sex; name and address known to be a parent of the student (and an indication of which parent he student normally lives with and which parents hold parental responsibility); address of new or additional places of residence; at least one contact telephone numbers at which the parent can be contacted in an emergency*; date of birth; name and address of last school attended (if any); and details of whether they are a boarder or a day student. The information must be forwarded to the Education Safeguarding Advisory Team (ESAT)

This information is also logged, and a record is kept by the DSL. *Note: In line with KCSIE 2021, it is the College's policy to hold a minimum of two emergency contact numbers for each student.

17.4a Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service.

17.5 The Prevent Duty

All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard" to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. There are four specific elements to Cherwell College's approach to meeting the statutory requirements imposed by the Prevent duty. In summary these are:

- Risk assessment – working with the Local Authority, who provide contextual information about the area, the College assesses the risk of students being drawn into terrorism, including extremist ideologies
- Working in partnership – liaising closely with the **Education Safeguarding Advisory Team (ESAT)** to ensure that students requiring support are referred at a suitably early stage
- Staff training – enabling staff to identify students at risk of being drawn into terrorism and to challenge extremist ideas

- IT policies – to provide guidance to students as to how to stay safe online (see Acceptable Use Policy) and set out the filtering and monitoring mechanisms in place.

Furthermore, the DSL regularly monitors risks in the local community and nationally and is trained to respond accordingly and appropriately. In addition:

- Prevent is included in College recruitment arrangements
- The College undertakes a Prevent risk assessment annually

17.6 Visiting speakers

Any student or member of staff who wishes to invite a speaker to address students must provide details of the individual to the DSL, so that a comprehensive vetting procedure can be undertaken. The event organiser will undertake a search via the internet to research the background of the individual and consider taking up references from other schools at which they have spoken at in the past. If the event organiser is a student, the member of staff in charge of that activity/society will undertake the search. The event organiser should also consider carefully whether the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups. In these circumstances the event will not be allowed to proceed.

It is not necessary to undertake a DBS check on every speaker. In cases where specific vetting checks are not prescribed by KCSIE, the visiting speaker will always be accompanied by a member of staff to ensure there is no unsupervised access to students. However, if a DBS check is deemed necessary, the appropriate details will be recorded on the College's SCR.

17.7 Confidentiality and information sharing

The College will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The College will co-operate with police and children's social services to ensure that all relevant information is shared for the purposes of child protection investigations.

Where a student who is subject to a child protection plan is moving to another school, the DSL will ensure their child protection file is securely transferred to the new school as soon as possible. This file will be transferred separately from the main student file to the DSL at the new school and confirmation of safe receipt will be obtained. The DSL should also consider if it would be appropriate to share any information with a new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have support in place for when the child arrives.

Where allegations have been made against staff, the College will consult with the LADO and, where appropriate, with the police and social services to agree the information that should be disclosed and to whom.

Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. The Data Protection Act 2018 and GDPR do not prevent, or limit, 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 promote the welfare and protect the safety of children. Information that is relevant to safeguarding is regarded as 'special category personal data' and as such can be shared securely on a need-to-know basis. Further non-statutory guidance on Information Sharing was published by the Government in July 2018. See Appendix 5

17.8 Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources;
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.
- Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.
- If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme.
- Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.
- Additional advice can be found at: [Cyber Choices](#), ['NPCC- When to call the Police'](#) and [National Cyber Security Centre - NCSC.GOV.UK](#)

17.9 Whistleblowing (also see Whistleblowing Procedures)

All staff are required to report to the Principal any concerns about:

- poor or unsafe safeguarding practices at the College;
- potential failures by the College or its staff to properly safeguard the welfare of students; or
- other wrongdoing in the workplace that does not involve the safeguarding and welfare of students.

If the member of staff feels unable to raise their concern with the Principal, the NSPCC whistle-blowing advice line is available for staff who do not feel able to raise safeguarding concerns internally (see Appendix 1 for contact details). Any member of staff can whistle-blow without fear of detriment (retribution or disciplinary action) provided the report was made in good faith. Malicious allegations may be considered as a disciplinary offence.

17.10 College premises, security and visitors

- The College will take all practicable steps to ensure that College premises are as secure as circumstances permit.
- All staff are identified by photo ID cards worn at all times during College related activities and duties – activities are recorded on the college computer system. A Visitors' Book is kept at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on College premises by a

member of staff. All visitors will be given a name badge with the title 'Visitor', which must be clearly displayed and worn at all times whilst on the College's premises.

- At the student Residence there is a card entry & exit system, which is recorded; CCTV; receptionist on duty; Resident Welfare Team.
- Entry to the Student Residence is accessed through the main reception door and visitors must seek permission to enter the building.
- All visitors to the boarding houses must sign in and report to the duty staff member immediately on arrival, and during the visit comply with the supervision arrangements put in place.

17.11 Monitoring this Policy

- Any child protection incidents at the College will be followed by a review of the safeguarding procedures in the College and a report to the Proprietorial Board. Where an incident involves a member of staff, the LADO will be asked to assist in this review to determine whether any improvements can be made to the College's procedures.
- The DSL will monitor the operation of this policy and procedures on a day-to-day basis and will provide regular updates at Senior Leadership Team meetings. In addition, the DSL will present a termly report which will be discussed by the Proprietorial Board.
- The Proprietorial Board will undertake an annual review of the policy and implementation of its procedures including good co-operation with local agencies and of the efficiency with which the related duties have been discharged. The Board will draw on the expertise of staff, including the DSL, when considering amendments to policies and/or arrangements related to safeguarding.
- Any deficiencies or weaknesses in child protection and safeguarding arrangements identified at any time will be remedied without delay.

17.12 Other relevant policies

The following policies should be read in conjunction with this policy:

- Anti-Bullying Policy
- Health and Safety Policy
- Educational Visits Policy
- Staff Recruitment, Selection and Disclosure Policy; Code of Conduct for Staff
- Behaviour; Mobile Phone Use Policy
- E-Safety Policy; ICT acceptable Use Policy; Cyber-bullying Policy
- Whistleblowing Policy
- Supervision Policy
- Missing Student Policy
- Mental Health and Wellbeing Policy
- Prevent Duty Policy

**Appendix 1: Contact details
Cherwell College Oxford**

Position	Name	Phone	e-mail
Designated Safeguarding Lead (DSL)	Anca Sitov	07799 578307 (Welfare Mobile)	anca@cherwell-college.co.uk
	Head of Boarding	01865 242670	
Deputy DSL	Helen Clarke	01865 242670	helen@cherwell-college.co.uk
	Vice-Principal	07799 578307 (Welfare Mobile)	
Deputy DSL	Katya Kryvonos DofE Centre Manager	01865 242670	katya@cherwell-college.co.uk
Principal & Proprietor	Stephen Clarke	01865 242670	stephen@cherwell-college.co.uk

Education Safeguarding Advisory Team (ESAT)
<http://schools.oxfordshire.gov.uk/cms/content/safeguarding>

Title	Name	Phone	e-mail
ESAT Manager and Designated Officer (LADO)	Alison Beasley	01865 815956 or	Alison.Beasley@oxfordshire.gov.uk
	(LADO) Lorna Berry	07833 436649	
ESAT member and Assistant Designated Officer	Donna Crozier	01865 816382 or	Donna.Crozier@oxfordshire.gov.uk
		07901 331799	
ESAT member and Assistant Designated Officer	Sandra Barratt	01865 323457	Sandra.pasquet@oxfordshire.gov.uk
	Becky Langstone		Charlotte.allen@oxfordshire.gov.uk
			Sandra.barratt@oxfordshire.gov.uk
LADO Safeguarding Team		01865 810603	lado.safeguardingchildren@oxfordshire.gov.uk

Local Authority children's social services numbers

Name	Phone	e-mail
LCSS Central for Early concerns regarding children in need or a no names referral	0345 2412705	LCSS.Central@oxfordshire.gov.uk
Oxford Multi-Agency Safeguarding Hub (MASH) for referrals regarding a	0345 050 7666 Outside office hours - Emergency	lado.safeguardingchildren@oxfordshire.gov.uk

child who has been harmed or is at risk	Duty Team: 0800 833 408 Katrina Johnson	
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Allegations against staff

Education Safeguarding Advisory Team (ESAT)	01865 810603	lado.safeguardingchildren@oxfordshire.gov.uk
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Extremism

Title	Name	Phone	e-mail
Oxford Multi-Agency Safeguarding Hub (MASH)		0345 050 7666	
DfE non-emergency advice	Telephone helpline and mailbox	020 7340 7264	counter-extremism@education.gsi.gov.uk
Police	Non-emergency number	101	

Female genital mutilation (FGM)

Title	Name	Phone	e-mail
ESAT Lead for FGM	MASH	0845 0507666	mash-childrens@oxfordshire.gcsx.gov.uk
Police	Non-emergency number	101	

Safeguarding and Child Protection Training, Consultation and Advice:

<https://www.oscb.org.uk/learning-zone/training/oscb-courses/>

Other useful contact details

Name	Phone
Childline	0800 1111
NSPCC	0808 800 5000
Kidscape (Anti-bullying helpline for parents)	0845 120 5204
Child exploitation Online Prevent (CEOP)	0870 000 3344

Appendix 2: Other types of abuse

- **Children missing from education:** all children of compulsory school age, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special needs they may have. A child going missing from education is a potential indicator of abuse or neglect, including possible sexual abuse, sexual exploitation or radicalisation. The College will report to the Local Authority instances of prolonged unauthorised absence or a student being removed from the College roll under the circumstances outlined in KCSIE (September 2021). In cases where a student has a prolonged period of authorised absence for a reason such as long-term illness, the College will be proactive in terms of providing support to both the parents and the student.
- **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More information include definitions and indicators are included in KCSIE 2021

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 (county lines, see page 85 for more information), 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.

Child Sexual Exploitation (CSE)

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 (for example, food, drugs, alcohol money or affection) and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access. 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. It is therefore important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.
- **County lines and child criminal exploitation:** 'County lines' is a term used to describe gangs, groups or drug and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK]: supply of drugs from urban to suburban areas across the country, including market and coastal towns, using dedicated mobile phone lines or 'deal lines'.

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.

Victims are recruited using intimidation, deception, violence, debt bondage or grooming. During this process the 'victims' are likely to commit criminal offences. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, range of Government departments, and local government agencies.

Child criminal exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child/young person under the age of 18.

This imbalance of power may be due to age but can also be due to other factors such as gender, cognitive ability, physical strength, status, and access economic other resources. The victim may have been criminally exploited even if the activity appears to be consensual. Child criminal exploitation is broader than just county lines; it can also encompass children being forced to commit theft or work on cannabis farms.

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 Mechanism¹⁰³ 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.

- **Domestic abuse:** is defined as 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 involved can take a variety of forms including psychological, physical, sexual, financial and emotional. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. 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.
- **Forced marriage:** A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.
- **Honour-Based Violence (HBV).** So-called 'honour-based' violence (HBV) encompasses crimes which have been committed supposedly to protect or defend the honour of the family and/or community, including FGM, forced marriage and practices such as breast ironing. All forms of HBV are abuse (regardless of the motivation) and illegal in the UK and should be handled and escalated as such.
- **Female Genital Mutilation (FGM).** 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. Victims of FGM are likely to come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

All staff must be aware of the law requiring teachers to report cases 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 aged under 18. The duty to report resides with the teacher who becomes aware of the case not the DSL, although the DSL should be informed unless the teacher has a good reason for not doing so. The report should be made orally by calling 101 within 24 hours of the issue coming to light. Failure to report a case of FGM can result in disciplinary sanctions.

- **Radicalisation and extremism:** 'Radicalisation' refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. 'Extremism' is defined in the Prevent strategy 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. This also includes calling for the death of members of the armed forces.

There are various reasons why a young person might become interested in extremism:

- a search for answers to questions about identity, faith and belonging

- a desire for ‘adventure’ and excitement
- a desire to enhance self-esteem of the individual and promote ‘street cred’
- the discovery of and identification with a charismatic individual and, through them, attraction to a group which can offer identity, social network and support
- a sense of grievance that can be triggered by personal experiences of racism or discrimination

The College has a legal duty to have due regard to the need to prevent people from being drawn into terrorism and this is an aspect of safeguarding. 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. Schools should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

College staff should use their professional judgement in identifying young people who might be at risk of radicalisation and discuss their concerns with the DSL. On the basis of this information the DSL may conclude that a referral to the Channel Programme is appropriate. The Channel programme is run in every local authority and addresses all kinds of extremism including the extreme-right and Islamist-related. The support provided could include assistance with education or employment, and ideological mentoring to provide vulnerable individuals with skills to protect themselves from being drawn into extremism. An individual’s engagement with the programme is entirely voluntary at all stages.

- **Youth produced sexual imagery** : While sharing photos and videos online and via smartphones is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives, there are risks associated with the production and distribution of sexual and explicit images. both in terms of the law (Protection of Children Act 1978, as amended by the Sexual Offences Act 2003) and in relation to the possible impact on a child’s well-being if images are shared more widely than they originally intended.

Creating and sharing sexual photos and videos of under-18s is illegal. The DSL should be notified as soon as possible if an incident comes to light in which a student under the age of 18:

- has created and shared sexual imagery of themselves with a peer under the age of 18;

has shared sexual imagery created by another person under the age of 18 with another person; or

- is in possession of sexual imagery created by another person under the age of 18.

Staff **must not** ask to see the imagery but should confiscate the device on which it is held and pass it on to the DSL. You should not view youth-produced sexual imagery unless there is good and clear reason to do so. Along with our own Safeguarding and Child Protection procedures, the College will follow the advice given in *Sexting in schools and colleges: Responding to incidents and safeguarding young people*, 2016.

A decision to respond to the incident without involving the police or children’s social care would be made in cases when the DSL is confident that they have enough information to assess the risks to students involved and the risks can be managed within the College’s pastoral support and disciplinary framework and, if appropriate, local network of support.

- **The Voyeurism (Offences) Act**, which is commonly known as the **Upskirting Act**, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Appendix 3: Further information on signs of abuse

Physical abuse

Physical signs	Behavioural signs
<p>Unexplained bruises and welts on the face, throat, arms buttocks thighs or lower back in unusual patterns or shapes which suggests the use of an instrument</p> <p>Unexplained burns, especially burns found on palms, soles of feet, abdomen or buttocks</p> <p>Scald marks –immersion burns produce ‘stocking’ or ‘glove’ marks on feet and hands or upward splash marks which may suggest hot water has been thrown over a child</p> <p>Human bite marks</p> <p>Broken bones</p>	<p>Behavioural extremes (withdrawal, aggression or depression)</p> <p>Unbelievable or inconsistent explanations of injuries</p> <p>Fear of parents being contacted</p> <p>Flinching when approached or touched</p> <p>Truancy or running away from home</p>

Emotional abuse

Physical signs	Behavioural signs
<p>Eating disorders, including obesity or anorexia</p> <p>Speech disorders (stammering)</p> <p>Nervous disorders (rashes, hives, facial tics, stomach aches)</p>	<p>Fear of parent being approached</p> <p>Fear of making mistakes</p> <p>Developmental delay in terms of emotional progress</p> <p>Cruel behaviour towards children, adults or animals</p> <p>Self-harm</p> <p>Behavioural extremes, such as overly compliant-demanding, withdrawn-aggressive, listless-excitable</p>

Sexual abuse

Physical signs	Behavioural signs
<p>Torn, stained or bloody underclothes</p> <p>Pain or itching in genital area</p> <p>Bruises or bleeding near genital area or anus</p> <p>Sexually transmitted infections</p> <p>Pregnancy</p> <p>Discomfort when walking or sitting down</p>	<p>Self-harm</p> <p>Sexual knowledge or behaviour (promiscuity) that is beyond their age/developmental level</p> <p>Sudden or unexplained changes in behaviour</p> <p>Avoidance of undressing or wearing extra layers of clothing</p> <p>Truancy</p> <p>Regressive behaviours (bed-wetting or fear of dark)</p>

Neglect

Physical signs	Behavioural signs
Height and weight significantly below age level Poor hygiene (lice, body odour etc) Inappropriate clothing for weather conditions Indicators of prolonged exposure to the elements (sunburn, chapped extremities, insect bites) Constant hunger, sometimes stealing food from others	Erratic attendance at school Chronic hunger or tiredness Having few friends Assuming adult responsibilities

Child sexual exploitation

Physical signs	Behavioural signs
Tiredness or mood swings Bruising Sexually transmitted diseases Pregnancy	Sudden decline in school performance, punctuality, attendance In possession of expensive goods Going to places they cannot afford Age-inappropriate clothing Inappropriate sexualised behaviour Secretive Mixing with older people Misuse of drugs and alcohol

Child criminal exploitation and county lines

Physical signs	Behavioural signs
See sections on physical and sexual abuse Carrying weapons	Self-harming Persistently going missing from school or home and/or being found out of area Unexplained acquisition of money, clothes or mobile phones Excessive receipt of texts/phone calls and/or having multiple handsets Relationships with controlling older individuals or groups Significant decline in school performance Gang association or isolation from peers or social networks

Female genital mutilation

Physical signs	Behavioural signs
Difficulty walking, sitting or standing Bladder or menstrual problems Severe pain and bleeding Infections such as tetanus, HIV & Hepatitis B and C	Abroad for a prolonged period Unusual behaviour after a period of absence May talk of a 'special procedure' or 'special occasion to become a woman' Spending longer periods in the bathroom Reluctance to undergo normal medical examinations

Forced marriage

Physical signs	Behavioural signs
Cut or shaved hair as a form of punishment for being disobedient	Absence from School Failure to return from visit to country of origin Self-harm or attempted suicide Running away from home Early marriage of siblings Sudden announcement of engagement to a stranger May talk of a 'special procedure' or 'special occasion to become a woman' Spending longer periods in the bathroom Reluctance to undergo normal medical examinations

Grooming

Physical signs	Behavioural signs
See section on sexual abuse	Spending increasingly prolonged time online Having older boyfriends or girlfriends Secretiveness about who they are talking to online and what sites they visit Possession of electronic devices such as mobile phones or webcams that parents have not provided Engaging less with their usual friends Using sexual language that you would not expect them to know Going to unusual places to meet people Using drugs and/or alcohol Going missing from home or school

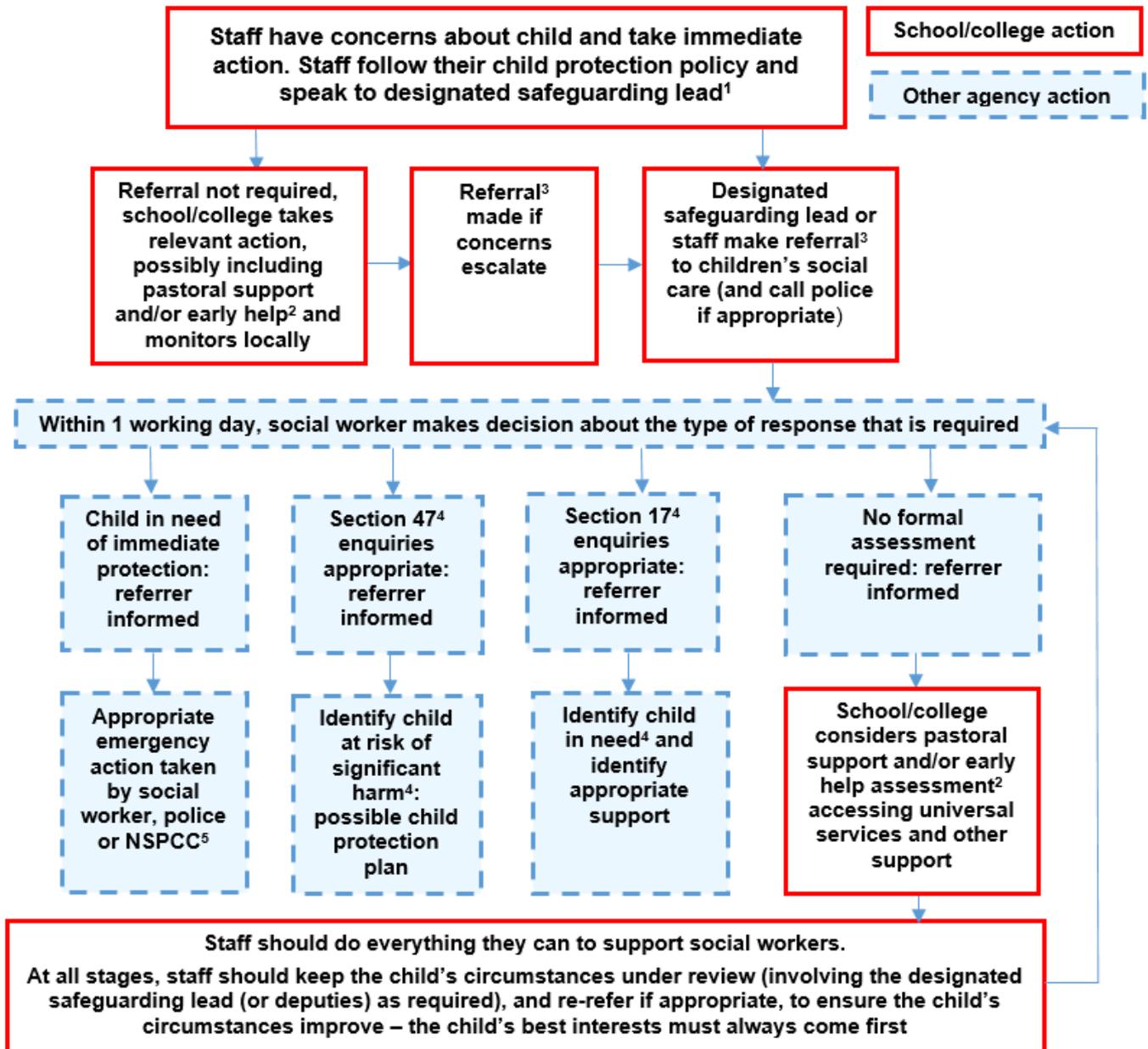
Radicalisation

Physical signs	Behavioural signs
Out of character changes in dress, behaviour and peer relationships	Showing sympathy for extremist causes Glorifying violence Evidence of possessing illegal or extremist literature A sudden disrespectful attitude towards others Increased secretiveness, especially in relation to internet use Unwillingness or inability to discuss their views Advocating messages similar to illegal organisations such as 'Muslims Against Crusades' or other non-proscribed extremist groups such as the English Defence League

Broad government guidance on the following is also available via the GOV.UK website (see Keeping children safe in education [September 2021])

- [bullying including cyberbullying](#)
- [children missing education](#)
- [child missing from home or care](#)
- [child sexual exploitation](#)
- [domestic violence](#)
- [drugs](#)
- [fabricated or induced illness](#)
- [faith abuse](#)
- [female genital mutilation \(FGM\)](#)
- [gangs and youth violence](#)
- [gender-based violence/violence against women and girls \(VAWG\)](#)
- [hate](#)
- [mental health](#)
- [missing children and adults](#)
- [private fostering](#)
- [preventing radicalisation](#)
- [relationship abuse](#)
- [nudity](#)
- [trafficking](#)

Appendix 4: Actions where there are concerns about a child

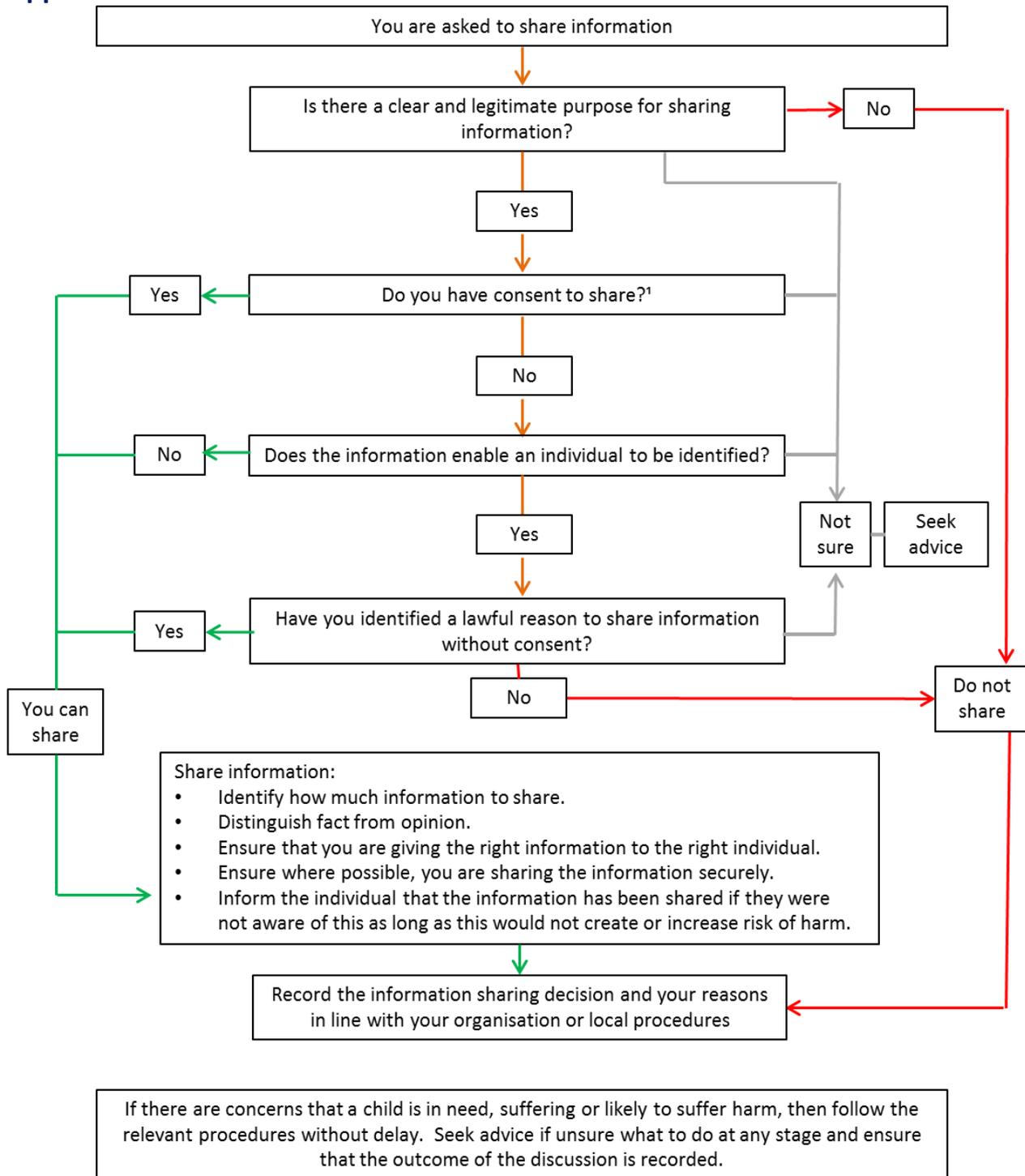


1. Cases where there is a concern or allegation made against a staff member, please refer to the Principal or LADO (see Section 15)

2. Early help involves providing support as soon as problem emerges. Where coordinated early help is required, an early help inter-agency assessment will be arranged.

3. Referrals will follow the processes set out in the Education Safeguarding Advisory Team (ESAT) threshold guidance

Appendix 5: Flowchart of when and how to share information



Appendix 6 Child Protection Expression of Concern Form

This form should be completed when there is cause for concern and given to your Designated Safeguarding Lead as soon as possible.

Details of Student:

Student's Name:

Details of the person reporting concerns:

Full Name:

Do these concerns relate to a specific incident/disclosure? If YES complete Section A; If NO, omit section A and move straight to Section B

Section A:

Date and time of incident/disclosure:

Location of incident/disclosure:

Date this form was completed:

Other persons present:

Section B:

Details of concern/disclosure/incident:

(What was said, observed, reported)

Action taken:

(What did you do following disclosure of the incident/disclosure/concern?)

Any other relevant information:

Signed:

Date:

For completion by the Designated Safeguarding Lead (DSL):

DSL Response

Action taken by DSL:

Rationale for decision making/actions taken:

Outcome of action taken by DSL:

Follow up action by DSL:

Feedback given to person reporting the concerns:

Signed by DSL:

Date:

Full Name:

Checklist for DSL:

- ✓ Concern described in sufficient detail?
- ✓ Distinguished between fact, opinion and hearsay?
- ✓ Child's own words used?
 - (swear words, insults or intimate vocabulary should be written down verbatim)
- ✓ Jargon free?
- ✓ Free from discrimination/stereotyping or assumptions?
- ✓ Concern recorded and passed to DSL in a timely manner?