



Safeguarding Policy 2022-2023

Equality Impact Assessment: Askham Bryan College recognises the importance of the Equality Act 2010 and its duties under the Act. This document has been assessed to ensure that it does not adversely affect staff, students or stakeholders on the grounds of any protected characteristics.

1. INTRODUCTION

1.1. The Governors and Staff at Askham Bryan College regard each learner as a unique individual and therefore seek to support learner development in ways which will foster security, confidence and independence. We recognise that high self-esteem, peer support, a secure College environment and clear lines of communication with trusted adults helps all young people and adults, particularly those at risk or suffering abuse. These are regarded as central to the wellbeing of the individual and are therefore seen to be an intrinsic part of all aspects of the curriculum and College ethos. The College is committed to safeguarding, to creating a culture of vigilance and maintaining a safe and secure environment for all our students and will ensure that action is taken to support them if abuse is suspected.

1.2. In order to safeguard and promote the welfare of children, young people and vulnerable adults, the College will act in accordance with the following legislation and guidance:

- Children’s Act 1989 and 2004;
- Education Act (2002) as amended by the Education and Training (Welfare of Children) Act 2021;
- Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges (September 2022); (KCSIE 2022)
- Working Together to Safeguard Children (2018);
- Inspecting safeguarding in early years, education and skills settings (August 2021)
- Care Act 2014;
- Police Act 1997 (Protection of Vulnerable Adults) Regulations 2013;
- Safeguarding Vulnerable Groups Act 2006;
- Counter-Terrorism and Security Act (2015);
- Revised Prevent Duty Guidance: for England and Wales (Home Office July 2015); (updated April 2021)
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018);
- [Sexual Violence and Sexual Harassment guidance;](#)

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- and
- Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads (May 2018) and
- [What to do if you are Worried a Child is Being Abused \(Advice for Practitioners\)](#).
- Domestic Abuse Act 2021
- Human Rights Act 1998 (HRA)
- Equality Act 2010
- Public Sector Equality Duty

1.3. The College will keep its policy and procedures under review to take account of any new Government legislation, regulations or best practice documents to ensure that staff are kept fully up to date with their responsibilities and duties with regard to the safety and well-being of children and vulnerable adults.

1.4. This Policy focuses on the protection of Children and Vulnerable Adults from risk of harm. It outlines the approach the College will take to protect our students while studying at College, whether they attend daily or they are living in the College's residential accommodation, and when students are in any work-based placements, including apprenticeships and during periods of work experience. The College Safeguarding Procedures (separate document) set out the procedures for dealing with suspicions of or allegations of abuse. The Safeguarding Policy and Procedures should be read in conjunction with the College's HR policies and procedures including Recruitment and Selection, DBS Policy and procedure, Staff Code of Conduct, Student Disciplinary Policy, Peer on Peer Abuse policy and Online Safety Policy.

1.5. As part of the whole College approach to safeguarding, we will ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the College are shared responsibly and with the right person, recorded and dealt with appropriately. The College will act on reports of anyone working for or on behalf of the College who is thought to have:

- Behaved in a way that has harmed a child
- Possibly committed a criminal offence against or relate to a child; or
- Behaved towards a child or children in a way that indicated that s/he is unsuitable to work with children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as transferable risk)
- Acts in a way that is inconsistent with the staff code of conduct but does not necessarily meet the thresholds of 'harm' set out in the bullet points above

For full details of the College approach to managing staff allegations, please see Safeguarding Procedures

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2. DEFINITIONS

Taken from “Working Together to Safeguard Children” 2018 and Keeping Children Safe in Education September 2022 (KCSIE 2022)

2.1 Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment (abuse);
- preventing 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; and
- taking action to enable all children to have the best outcomes.

2.2 Child Protection is defined as:

- Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Definitions of **Abuse** are given at Appendix 2.

2.3 Children

Children are those students under 18 years or age

2.4. Vulnerable Adults

The Safeguarding Vulnerable Groups Act 2006 defines a ‘vulnerable adult’ as a person aged 18 and over and:

- Receiving a social care service;
- Receiving a health service;
- Living in sheltered accommodation;
- Detained in custody or under a probation order;
- Requiring assistance in the conducting of his/her affairs;
- Receiving a service or participating in an activity targeted at older people with disabilities or with physical or mental health conditions; or
- OR any adult whose circumstances make them vulnerable at a specific time.

2.5 Children with special educational needs and disabilities:

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. College policy and approach to safeguarding reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

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- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

Further information can be found: [SEND Code of Practice 0-25](#)

3. COLLEGE POLICY

3.1. The College recognises that safeguarding and promoting the welfare of our students is everyone's responsibility and will:

- take all appropriate actions to address concerns about the welfare of children and vulnerable adults, including those with special educational needs and disabilities, ensuring that our approach is student-centred and has the best interests of the student in mind at all times;
- work in line with local policies and procedures in partnership with other local agencies, particularly the 'local safeguarding partners' as defined in Working Together to Safeguard Children 2018 i.e. the Local Authorities, Clinical Commissioning Groups and the Chief(s) of Police;
- plan, implement, monitor and review policies and procedures to ensure that all is being done to provide a safe environment for all those in our College community;
- take a preventative approach to protecting children and vulnerable adults from potential harm, damage, radicalisation or being drawn into terrorism (violent and non-violent extremism); and
- take all reasonable measures to ensure that risks of harm to children and vulnerable adult's welfare is minimised as appropriate:
- have a proactive approach to risk assessment and management;
- have effective Health and Safety procedures;
- ensure our Staff selection, recruitment, induction, supervision and training policies and processes are in line with legislation and good practice;
- establish and maintain an environment where staff feel safe, are encouraged to talk and are listened to when they have concerns about the safety of a child or vulnerable adult; and

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- ensure that our entire College community, staff and students, knows how to identify, respond to and report abuse;
- require all newly recruited staff to undergo a DBS enhanced check and all staff are required to complete a DBS declaration as part of the annual appraisal process

3.2 Human Rights Act

3.2.1 The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

3.2.2 Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and
- Protocol 1, Article 2: protects the right to education.

3.2.3 Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

3.3. Equality Act 2010

3.3.1 Schools and colleges have obligations under the Equality Act 2010 (the Equality Act). According to the Equality Act, College must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, the Corporation should carefully consider how they are supporting students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

3.3.2 Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their

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specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. College, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

3.4 Public Sector Equality Duty

3.4.1 The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement for state-funded schools and colleges.

3.4.2 The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism.

3.4.3. The PSED recognises that some students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. College will remain conscious of disproportionate vulnerabilities and integrate this into our safeguarding procedures.

4. RESPONSIBILITIES

4.1 Corporation

College Corporation has strategic leadership responsibility for the College's safeguarding arrangements and as such, are responsible for ensuring that that they comply with their duties under legislation. Corporation must have regard to the statutory guidance in KCSIE 2022, ensuring policies, procedures and training in College are effective and comply with the law at all times;

Corporation will ensure that:

- a Governor designated safeguarding lead is nominated to take leadership responsibility for the College safeguarding arrangements;
- all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction, to equip them with the knowledge to provide strategic

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challenge to test and assure themselves that the safeguarding policies and procedures in place in College are effective and support the delivery of a robust whole college approach to safeguarding. This training will be regularly updated.

- a whole college approach to safeguarding is facilitated. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of our students at their heart;
- a culture exists so that where there is a safeguarding concern, that the student's wishes and feelings are taken into account when determining what action to take and what services to provide;
- students are taught about safeguarding, including online safety, and recognise that a one size fits all approach may not be appropriate for all students, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed;
- systems are in place, and they are well promoted, easily understood and easily accessible for students to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback;
- mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part One (or Annex A if appropriate) of KCSIE 2022;
- relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR;
- there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare. These policies should include an effective child protection (Safeguarding) policy, a student disciplinary policy, a Staff Code of Conduct, a policy on Safer Recruitment;
- that the SLT and relevant staff are aware of the filter and monitoring systems in place, that they are managed effectively and that staff know how to escalate concerns when identified
- that there are appropriate arrangements in place to respond to children who go missing from education;
- that the recording and keeping of child protection information is undertaken in accordance with KCSIE 2022;
- an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of Designated Safeguarding Lead (DSL);

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- the DSL will be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

4.2 The Executive Team will ensure that:

- those staff who work directly with children understand their safeguarding responsibilities and have read and understood at least Part One of KCSIE 2022;
- those staff who do not work directly with children have read and understood either Part one or Annex A (a condensed version of Part one) of KCSIE 2022. The decision on which document is appropriate to which groups will be based on a college assessment of which guidance will be most effective for their staff to safeguard and promote the welfare of children;
- as part of the requirement for staff to undergo regular updated safeguarding training, including online safety and the requirement to ensure children are taught about safeguarding, including online safety, that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole College safeguarding approach and wider staff training and curriculum planning;
- all College staff, including contractors, have a collective and individual duty of care to ensure that staff fulfil their responsibilities to prevent the abuse of children and vulnerable adults, to refer any abuse discovered or suspected and to prevent students from being drawn into terrorism;
- the College operates safe recruitment procedures and ensures that all appropriate checks are carried out on new staff including supply staff and volunteers who will work or come into contact with children ensuring compliance with the statutory requirements, (including appropriate DBS checks). The Recruitment and Selection policy specifies the criminal disclosure procedure and this is monitored by the People Services Department. At least one of the interviewers when interviewing for new staff will have completed Safer Recruitment training where possible;
- the College complies with the Education (Restriction of Employment) Regulations 2000 and report to the appropriate authorities when a person is dismissed, or resigns in circumstances which would have led to their dismissal, on grounds of misconduct;
- a member of the College Senior Leadership Team is designated to carry overall responsibility for the protection of students (i.e. the Designated Safeguarding Lead) who will report annually to the Corporation on Safeguarding. Any issues of immediate concern

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will be reported to the Designated Safeguarding Lead of the College as and when they arise;

- the College will work with appropriate agencies and will liaise with the Local Safeguarding Partners for the purposes of establishing and updating procedures, coordinating training and sharing information. The procedures are reviewed annually;
- the College recognises that any child or vulnerable adult can be subject to abuse or radicalisation and all allegations of abuse or concerns about radicalisation will be taken seriously and treated in accordance with the College's procedures;
- the Safeguarding Policy and Procedure will be made available to all parents/carers (via the College website);
- a team of Designated Safeguarding Officers (DSO) is nominated who will act as a first point of contact for other staff on safeguarding issues and will be responsible for co-ordinating action within the College and liaising with other agencies; contributing to a coordinated approach to safeguarding by developing effective liaison with other agencies and support services;
- the role and responsibilities of the Safeguarding team members are specified and ensure that they are trained and developed to carry out the role;
- all staff are aware of this policy and provide them with procedures for responding to situations in which they believe a student has been abused or is at risk of abuse. The College recognises that it is the responsibility of all staff to act upon any concern, no matter how small or trivial it may seem. This will include procedures to be followed if a member of staff is accused of abuse;
- all staff have read and understood either Keeping Children Safe in Education 2022 Part 1 or Annex A, whichever is determined as appropriate by the College;
- all members of staff undergo appropriate training and development. Members of the Corporation, the Senior Leadership Team (SLT) and all other staff who work with students will undertake training to equip them to carry out their responsibilities for safeguarding children and vulnerable adults effectively including the PREVENT strategy and online safety. All new employees undertake training as part of the induction process, including completion of an online safeguarding module;
- all staff will be kept up to date by online refresher training every 3 years. There will be regular updates provided as required, but at least annually;
- the Safeguarding team will undertake refresher training at least every two years to keep their knowledge and skills up to date, this will include providing appropriate supervision;

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- all Corporation members undergo a DBS Enhanced check;
- the Residential team will have specific training in line with the requirements of the Social Care Common Inspection Framework;
- accurate records of safeguarding concerns and all incidents are kept and maintained in a secure place, all referred cases will be within CPOMS for monitoring purposes;
- students are informed about relevant sources of information, advice and support and play a part in the prevention of abuse through personal and social education. Information and sources of support are made available to students through leaflets, posters and a variety of media throughout the College;
- all those responsible for assessing workplaces in advance of work experience placements, traineeships or apprenticeships undertake a Health and Safety Risk Assessment of the workplace to assess whether appropriate safety measures are in place prior to a student commences at the work place. If they are not, the student will not be allowed to commence.

4.3. Designated Governor

The designated governor is responsible for liaising with the Designated Safeguarding Lead and senior staff members with lead responsibility over matters regarding safety including:

- ensuring the College has procedures and policies in place for the safeguarding of children and vulnerable adults, including those with special educational needs and disabilities; ensuring the governing body considers these policies each year;
- ensuring the governing body is informed of how the College and its staff have complied with the policy, including but not limited to a report on the training the staff have undertaken.
- the designated governor may also be the key link to the Local Authority Designated Officer (LADO) in connection with allegations against the Designated Safeguarding Lead or the Chief Executive. This will not involve any form of investigation but will ensure good communication between the parties and the provision of information to assist enquiries.
- to assist in these duties the designated governor will receive appropriate training as directed by the College and Local Safeguarding Partners.
- the role of the designated Safeguarding Governor (and Corporation) in relation to cases of allegations against members of staff is set out in College Safeguarding Procedures.

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4.4. Designated Safeguarding Lead (DSL)

Assistant Principal (Students)

- the designated senior member of staff with lead responsibility for child/vulnerable adult protection issues is Assistant Principal (Students). This person is a member of the Senior Leadership Team (SLT) and has a key duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of children and young people, and the promotion of a safe environment (including online safety) for the children, young people and vulnerable adults learning within the College and its centres. The role is as defined in Annex C of KCSIE 2022 and shown in full at Appendix 3;
- the role includes helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and college and college leadership staff. Their role will include ensuring that the college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children;
- whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSL, this lead responsibility will not be delegated;
- the DSL will receive training in child/vulnerable adult protection issues and inter-agency working, as required by the Local Safeguarding Partners and will receive refresher training at least every two years;
- the DSL will provide an annual report to the governing body of the College setting out how the College has discharged its duties and is responsible for reporting deficiencies in procedure or policy identified by the Local Safeguarding Partners (or others) to the governing body at the earliest opportunity;
- the DSL will also convene regular meetings of the Safeguarding Committee;
- The DSL will ensure that cases where a person is dismissed or leaves the College due to risk/harm to a child to the are referred to the Disclosure and Barring Service as required, by the People Services team;
- ensure that cases are referred to the Disclosure and Barring Service of existing members of staff if they have harmed or pose a risk of harm to a child where either the individual member of staff has been deployed to an area of work that is non-regulated activity or they have been suspended.

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- refer cases where a crime may have been committed to the Police;
- liaise with the Chief Executive to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations and allegations relating to staff members;
- as required, liaise with the “case manager” and the designated officer(s) at the local authority (LADO) for child protection concerns in cases which concern a staff member;
- liaise with the Children and Young People’s Services Department of the Local Authority, the Local Safeguarding Partners and other appropriate agencies in relation to referrals to ensure we have up to date information on their local arrangements and also to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements;
- ensure the college’s child protection (Safeguarding) policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with SLT and Corporation regarding this;
- ensure the college’s child protection (safeguarding) policies are known, understood and used appropriately; ensuring that all staff receive basic training in child protection/vulnerable adult issues and are aware of the College’s Safeguarding Procedures and Policy and Keeping Children Safe in Education (Part 1) and the College Peer on Peer Abuse Policy. In addition, all staff members should receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff members should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively;
- ensure availability of Designated Safeguarding staff out of College hours to receive and deal with any safeguarding issues;
- ensure that the systems for supporting vulnerable students to achieve their outcomes and the systems for monitoring and reporting on their progress, both within college and to external agencies, are effective;
- work with others to ensure that policies, training and practice give staff the confidence to know when, how and to whom they can share sensitive information when dealing with a safeguarding concern and to ensure that staff understand the need to record that information in a neutral and professional manner, focusing on what is necessary for the safeguarding purpose;

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- will ensure that designated safeguarding officers and senior leaders are made aware of the National Police Chief's Council (NPCC) guidance and use it when making a Police report and when liaising with the Police on safeguarding issues; [NPCC: When to call the police](#)
- the role of the DSL in management of cases of allegations against members of staff is set out in College Safeguarding Procedures;

4.5 Deputy Designated Safeguarding Lead (Deputy DSL)

Head of Student Services

The Deputy DSL role is in place to support the DSL in operational and policy matters. The Deputy will be trained to the same standard as the designated safeguarding lead. The activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out in this policy, remains with the DSL. This responsibility will not be delegated.

In addition to deputing for the DSL, the Deputy will be responsible for :

- liaising with employers and training organisations that receive children or young people/vulnerable adults from the College on long term placements to ensure that appropriate safeguards are put in place

4.6. Senior Designated Safeguarding Officers (SDSO)

Student Services Manager and Residential Services Manager

The designated members of the Management Team with lead operational responsibility for safeguarding are the Student Services Manager and Residential Services Manager. They are responsible for overseeing the operation of procedures, supported by the Designated Safeguarding Officers. This involves:

- overseeing the referral of cases of suspected abuse/radicalisation or allegations to the City/County Council's Department of Children and Young People's Services, or other agencies (such as the police, Channel) as appropriate;
- liaising with relevant parties within local authorities to identify those students who have a social worker;
- leading on the provision of pastoral support to looked after and previously looked after children;

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- providing up to date training, advice and support and expertise to staff on issues relating to child/vulnerable adult protection, particularly those staff undertaking the role of Designated Safeguarding Officer;
- ensuring that proper records of any child/vulnerable adult protection referral, complaint or concern are maintained (even where that concern does not lead to a referral); all concerns, discussions and decisions made, and the reasons for those decisions will be recorded in writing
- ensuring that parents/carers of children and young people/vulnerable adults within the College are aware of the College's Child/Vulnerable Adult Protection (Safeguarding) Policy and are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the College in this;
- ensuring an effective level of engagement and coordination with teachers, members of the leadership team and local authorities (as well as any other relevant statutory agencies) to link up safeguarding and academic support for pupils, in particular those identified as having increased risk or in need of additional support;
- liaising with secondary schools and other providers that send pupils to the College to ensure that appropriate arrangements are made for the pupils;
- supporting staff who make referrals to local authority children's social care;
- liaising with staff where necessary (especially support staff, IT Technicians, and the Learning Support Manager) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
- in addition to any formal training, the knowledge and skills of the SDSOs will be refreshed via e-bulletins on safeguarding developments and networking with other designated safeguarding officers at regular intervals, as required, and at least annually. This will allow them to understand and keep up with any developments relevant to their role so they understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.

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4.7. People Services

- People Services staff have a responsibility to ensure that all the recommended employment checks are carried out on new staff and the appropriate authorities are notified of any dismissals due to misconduct;
- the Executive Director of People and Organisational Development has a responsibility to ensure that minimum levels of training are established for different levels of staff and that the training is scheduled within the College training plan;
- the role of the Executive Director of People and Organisational Development in cases involving allegations of abuse by members of staff/volunteers, is set out in College Safeguarding Procedures;
- People Services should ensure that all staff are aware of systems within College which support safeguarding. These systems will be explained to them as part of the staff induction. The mandatory list of policies that have to be explained at induction is as follows:
 - the Safeguarding policy;
 - the Staff Disciplinary policy;
 - the Staff Code of Conduct;
- People Services are responsible for maintaining an accurate and up to date Single Central Record
- People Services are responsible for the delivery of Safer Recruitment training to relevant staff

4.8. Designated Safeguarding Officers

Designated members of staff with particular responsibility for child protection/vulnerable adult issues are:

- Assistant Principal (Students) (DSL);
- Head of Student Services (Deputy DSL);
- Student Services Manager (SDSO);
- Residential Services Manager (SDSO);
- Designated Safeguarding Officers (DSOs);
- Curriculum Area Manager for Middlesbrough
- Curriculum Team Leaders at Saltaire and Wakefield.

These designated staff members will:

- refer cases of suspected abuse to the local authority children’s social care as required;

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- keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the College with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- understand the unique risks associated with online safety and are confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at College;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them;
- obtain access to resources and attend any relevant or refresher training courses;
- are trained and able to receive and make an appropriate child/vulnerable adult protection referral to external agencies;
- will be available to provide advice and support to other staff on issues relating to child/vulnerable adult protection;
- have particular responsibility to be available to listen to children, young people and vulnerable adults studying at the College;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- have received training in child protection/vulnerable adult issues (currently to Level 3) and inter-agency working, as required by the Local Safeguarding Partners, and will receive refresher training at least every two years;
- can offer advice and support to all members of staff;
- ensure that procedures are followed; and

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- should always be available (during College hours) for staff to discuss any safeguarding concerns. In exceptional circumstances availability via phone / online or other such media is acceptable.

In addition, DSOs are responsible for reporting on Safeguarding aspects to the SDSOs for the overall organisation and their nominated 'link' sites on a termly basis (to coincide with meetings of the Safeguarding Committee).

5. Safeguarding Committee

This group will meet once a term.

Membership:

- Designated Safeguarding Lead
- Deputy DSL
- Vice Principal – Curriculum and Quality (Chair)
- Curriculum Area Managers responsible for Centres
- Senior Designated Safeguarding Officers
- Executive Director of People and Organisational Development
- Director of Estates
- Curriculum Area Manager for Apprenticeships
- Safeguarding Governor

The role of the group will be:

- To ensure there are appropriate and adequate safeguarding systems and controls are in place at the College including the Prevent Duty and Safer Recruitment
- To produce and present appropriate safeguarding reports and updates (including annual reports) to appropriate College, members of the College management and the College Corporation.
- Review and make recommendations to the policies and procedures in place relating to safeguarding of staff and students.
- To keep up to date with and share information appropriately related to latest guidance and legislation relating to safeguarding
- To consider any issues raised by staff, students or stakeholders related to safeguarding
- To monitor training requirements of staff, students and other stakeholders
- Agree and monitor the safeguarding action plans and risk register
- Ensure equality, diversity and inclusion are considered in relation to all safeguarding matters

6. STAFF CONCERNS ABOUT THE COLLEGE POLICY/PROCEDURES

6.1. If staff have any concerns about unsafe practice or potential failures in the College's safeguarding regime they should, in the first instance, make reference to and utilise the College policy on Whistleblowing.

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6.2 The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call the NSPCC on 0800 0280285 from 8am to 8pm Monday to Friday and / or email: help@nspcc.org.uk

7. USE OF EXTERNAL CONTRACTORS

7.1. Where Contractors are employed by the College, it is the responsibility of the Designated Safeguarding Lead (in conjunction with the Director of Estates) to ensure that any contractor, or any employee of the contractor, who is to work at the school or college, has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information). For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including barred list information) will be required. In considering whether the contact is regular, it is irrelevant whether the contractor works on a single site or across a number of sites. For those providing a service (e.g. for catering, cleaning) all employees should be DBS checked.

7.2. For contractors engaged to undertake work on a short-term basis (eg electricians), risk assessments are carried out. Contractors in respect of whom no checks have been obtained will not be allowed to work unsupervised, or engage in regulated activity. A risk assessment will be undertaken, entry and exit routes of contractors are agreed, and they are not allowed to leave their work place except at agreed times. The DSL, where required, will be responsible for determining the appropriate level of supervision depending on the circumstances.

7.3. If a contractor working at a College is self-employed, the DSL (in conjunction with the Director of Estates) should consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

7.4. Reception staff will always check the identity of contractors and their staff on arrival at College.

8. THE PREVENT STRATEGY (SEE ALSO APPENDIX 1)

8.1. The College raises awareness of specific vulnerabilities in order to ensure that staff are supported to recognise the signs and symptoms related to specific forms of abuse. This includes radicalisation/ violent extremism including (but not restricted to) those linked to Islamist ideology or far right and other extremist movements. The DSL liaises with the police and the local Counter-terrorism teams over matters related to students and staff concerning violent extremism / radicalisation, including updates on particular local risks (centres) and

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matters affecting FE and HE institutions. All staff undertake Prevent training and SLT are updated about students who are supported through the Channel network.

8.2. Assessing Risk – all people who are believed to be engaged in or planning to be engaged in any form of extremist activity, or their behaviour causes a concern, must be referred to the Prevent Lead (Assistant Principal (Students)). Normally a member of the Safeguarding Team will make the referral but any staff member can do so if they wish. The PCSO and other statutory organisations will be informed as appropriate. External referrals to Channel and other sources of support are made by the DSL

8.3 The DSL annually updates the College Prevent Risk Assessment and Action Plan in conjunction with local partners

9. ONLINE SAFETY

9.1. College IT policies and processes and the College tutorial programme reflect the need to protect and educate the whole College community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate. This reflects the fact that the use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

9.2 College will ensure that online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum (differentiated where necessary to take into account student need), any teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement

9.3 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism;
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes’;
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

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- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

9.4 For further guidance, see the College Online Safety Policy including the use of mobile and smart technology. Amongst other things this will reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content.

9.5 Remote learning

In the event that students are being asked to learn online at home, College will follow the Department for Education advice to support schools and colleges do so safely: [Safeguarding and remote education](#) (originally drafted for use during the Covid pandemic)

9.6. Filters and monitoring

Whilst considering our responsibility to safeguard and promote the welfare of children, and provide them with a safe environment in which to learn, the College has considered the age range of our students, the number of students, how often they access the IT system and the proportionality of costs vs risks. This will be informed in part by the risk assessment required by the Prevent Duty. As part of this process, the College ensures that, as far as possible, it has appropriate filters and monitoring systems in place. We will make parents/carers aware through our website which systems we have in place to filter and monitor online use.

9.7 Useful resources

- DfE advice for schools: [teaching online safety in schools](#)
- UK Council for Internet Safety (UKCIS)¹ guidance: [Education for a connected world](#)
- UKCIS* guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

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- The UKCIS [external visitors guidance](#) will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors
 - National Crime Agency's CEOP education programme: [Thinkuknow](#)
 - Public Health England: [Every Mind Matters](#)
 - [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support
- * UK Council for Internet Safety Education subgroup is made up of sector experts who collaborate to produce advice and guidance to support schools and colleges keep their children safe online.

9.8 Please see the College's Online Safety Policy for further details.

10. INFORMATION SHARING

10.1 In line with the principles set out in 'Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018), the College recognises that:

The UK GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. Safeguarding children is a processing condition that allows practitioners to share special category personal data, such as sharing information without consent where there is good reason to do so, but to do so fairly and lawfully and to keep the information they hold safe and secure. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

To effectively share information:

- College recognises the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place that set out clearly the processes and principles for sharing information within the school or college and with children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required

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- College staff should be proactive in sharing information as early as possible to help identify,
- assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children’s social care
- College staff should be confident of the processing conditions, which allow them to store, and share, the information that they need to carry out their safeguarding role. Information which is relevant to safeguarding will often be data which is considered ‘special category personal data’ meaning it is sensitive and personal.
- Where College staff need to share special category personal data, they should be aware that the Data Protection Act 2018 includes ‘safeguarding of children and individuals at risk’ as a condition that allows practitioners to share information without consent.
- Information can be shared legally without consent, if the staff member is unable to, or cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child at risk.
- Relevant personal information can be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional well-being.
- The College will reflect the principles of good practice within the [Data protection: toolkit for schools](#)
- Further details on information sharing can be found
- in Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting guide to information sharing
- at [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#). The seven golden rules for sharing information will be especially useful
- at [The Information Commissioner’s Office \(ICO\)](#), which includes ICO UK GDPR FAQs and guidance from the department
- in [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the UK GDPR.

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10.2 Child protection files

10.2.1 Where children leave the College the DSL should ensure their child protection file is transferred to any new school or College as soon as possible (and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives, to allow the new school or college to continue support for children who have had a social worker and been victims of abuse and have that support in place for when the child arrives). The DSL should also ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCOs) or the named persons with oversight for SEN in a college, are aware as required. As a receiving College, the DSL should ensure key staff are aware as required. The DSL/SDSO will also ensure that any incoming files (electronic or paper) are stored securely.

10.2.2 In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the ‘Channel’ programme and have that support in place for when the child arrives. More information on child protection files is in Annex C – KCSIE 2022.

11. USE OF FORCE TO CONTROL OR RESTRAIN

The College approach to the use of force to control or restrain students where necessary is contained within the Policy ‘Use of force to control or restrain’.

12. REVIEW AND MONITORING

The Safeguarding Policy is reviewed annually and its provisions monitored by the governing body with input from SLT and from the Learner Voice.

13. RELATED DOCUMENTS

- Safeguarding Procedures
- Staff Code of Conduct
- Recruitment and Selection of Staff (Policy)
- Whistleblowing Policy
- Staff Disciplinary Policy
- Peer on Peer Abuse Policy
- Online Safety Policy
- Student Disciplinary Policy

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APPENDIX 1: PREVENT STRATEGY

1. Purpose

The purpose of this strategy is to outline our approach to supporting the national ‘Prevent’ Agenda linked to the safeguarding of our students and staff. This Strategy is written with reference to the Prevent Duty contained within Section 26 of the Counter Terrorism and Security Act 2015. The Duty states that specified authorities including Further Education Colleges, in the exercise of their functions, must have “due regard to the need to prevent people from being drawn into terrorism.”

2. Context

The aim of this strategy is to:

- Develop an awareness of Prevent in the College
- Recognise current practice which contributes to the Prevent agenda
- Identify areas for improvement
- Develop a coordinated action plan

3. Awareness of Prevent Agenda

3.1. Prevent is 1 of the 4 elements of ‘CONTEST’, the government’s counter-terrorism strategy. The 4 elements are: Pursue, Protect, Prepare and Prevent. It aims to stop people becoming terrorists or supporting terrorism.

3.2. The Prevent strategy responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.

3.3. It provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.

3.4. It works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation.

3.5. It covers all forms of terrorism, including far right extremism and some aspects of nonviolent extremism.

Source: <https://www.gov.uk/government/publications/prevent-duty-guidance>

4. College practice which contributes to Prevent

4.1. The College Safeguarding Policy features reference to the Prevent agenda and all

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current and future Safeguarding officers will have participated in Prevent training.

- 4.2. The College has strong links with regional Prevent Coordinators, local Police and designated local authority staff with responsibility for Prevent matters both in education and in the local community. The Student Services Managers and College Designated Lead for Safeguarding have the details for contacting 'CHANNEL' a process which supports people at risk of being drawn into terrorism). The College also has close links with Police Community Support Officers who attend the College on a regular basis to normalise police presence and help maintain trust between students and the police service.
- 4.3. All members of staff and subcontractors complete Prevent training. Subcontractors are also required to undertake Prevent training and this is facilitated by the College.
- 4.4. All College employees have Prevent training, this is covered **during induction** and staff are required to complete an on-line module.
- 4.5. Corporation members undertake Prevent training.
- 4.6. Our work to promote Equality and Diversity within College, incorporates British Values, contributes to good community relations and reduces the risk of radicalisation.
- 4.7. Mainstream political parties are invited in to College to support democracy related events. The College will not allow representation at such events, from parties with extreme views which promote violence or intolerance.
- 4.8. Guidelines for the use of visiting speakers within the curriculum, for cross College events and as part of any external lettings//commercial hire.
- 4.9. Site-based risk assessments are updated annually to reflect any new identified risks in conjunction with local partners. These feed into a cross-college Action Plan, also reviewed annually.
- 4.10 The College operates an External Speakers Policy for all guest speakers (online and on-site) that requires a risk assessment based approach to the speaker, including consideration of whether they will attend an open event on site or one restricted to students of the College

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APPENDIX 2: DEFINITIONS OF ABUSE

Definitions of Abuse

1. Definition of abuse in 'KCSiE 2022(Part 1): 'Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
2. **Physical Abuse:** This form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
3. **Emotional abuse:** This is 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 the opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
4. **Sexual abuse:** This involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can

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other children. The sexual abuse of children by other children is a specific safeguarding issue in education (also known as peer on peer abuse) and all staff should be aware of this and the College policy – see 7.1 below and Peer on Peer Abuse Policy and Procedures.

- 5. Neglect:** This is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.
- 6. Significant Harm:** Some children are in need because they are suffering or likely to suffer significant harm. The Children Act 1989 introduced Significant Harm as the threshold that justifies compulsory intervention in family life in the best interests of children.

Additional forms of Abuse

7.1. Peer on Peer abuse: staff should recognise that children are capable of abusing their peers. It can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported.

Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

- bullying (including cyberbullying, prejudiced- based and discriminatory bullying);
- abuse in intimate relationships between peers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);

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- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals.

7.1.1 The College will take any concerns of this nature very seriously and the concerns should be raised and dealt with in the same way as any other concerns, directly to the DSL/ Deputy DSL/SDSO

7.1.2 The DSL will ensure that:

- procedures to minimise the risk of peer on peer abuse are in place and clear to all staff;
- staff are aware of how allegations of peer on peer abuse will be recorded, investigated and dealt with;
- staff are clear as to the College policy and procedures (Peer on Peer Abuse Policy) and the important role they have to play in preventing it and responding effectively when they believe a student is at risk from it
- there are clear processes as to how victims, perpetrators and any other child affected by peer on peer abuse will be supported;
- staff recognise the gendered nature of peer on peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all peer on peer abuse is unacceptable and will be taken seriously; and
- staff are aware of the different forms peer on peer abuse can take (see above);

7.2. Teenage Relationship Abuse

Abuse in young people's relationships can involve the same forms of controlling and coercive behaviour, physical, emotional, psychological, financial and sexual violence and abuse as seen in adult relationships.

7.3. Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

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It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

7.3.1 Sexual violence

It is important that college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 ¹ as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

¹ See Sexual Offences Act 2003 available at [Legislation.gov.uk](https://www.legislation.gov.uk)

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Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is consent?²

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#)

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

7.3.2 Sexual harassment When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

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- non-consensual sharing of nudes and semi-nudes images and/or videos / sharing of sexual images and videos; [UKCIS Sharing nudes and seminudes: advice for education settings working with children and young people](#) for detailed advice – taking and sharing nude photographs of under 18s is a criminal offence
- sharing of unwanted explicit content; sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats; and
- upskirting. (a criminal offence)

It is important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation. Due to their additional training, the designated safeguarding lead (or deputy) should be involved and generally speaking leading the school or college response. If in any doubt, they should seek expert advice. [Project deSHAME](#) from Childnet provides useful research, advice and resources regarding online sexual harassment.

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

7.3.3 Upskirting

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 persons 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.

7.3.4 Managing allegations of sexual violence or harassment – please see College Peer on Peer Abuse Procedures)

8. So-called ‘honour-based’ abuse (including Female Genital Mutilation and Forced Marriage)

8.1 So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes

which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can

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include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

8.2 Actions

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

9. 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.

9.1 FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#)

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.⁴ Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s or college’s designated safeguarding lead (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to at risk

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or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

10. Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. 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 perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmufco.gov.uk

11. Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

11.1 We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

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

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

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

- appear with unexplained gifts, money or new possessions;

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

Children who have been exploited will need additional support to help maintain them in education.

CSE 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.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

11.2 Child Sexual Exploitation

11.2.1 (CSE) occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. 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). Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance [Child sexual exploitation: guide for practitioners](#)

11.2.2 The following can be indicators of CSE (see also indicators under CCE – para 12 below):

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

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11.2.3 CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

11.3 Child criminal exploitation (CCE):

11.3.1 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), 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;
- children who regularly miss school or education or do not take part in education.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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11.3.2 Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

11.3.3 It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

12. County Lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry illegal drugs (primarily crack cocaine and heroin) and money from urban areas to suburban and rural areas, market and seaside towns or other urban areas, using dedicated mobile phone lines or other form of “deal line”. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (via national crime agency for human trafficking) should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”.

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This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

13. Domestic Abuse

13.1 The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross government definition, ensures that different types of relationships are captured, including ex -partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the

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behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

13.2 Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing 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.

13.3 Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act’s provisions, including the new definition, will be commenced over the coming months.

13.4. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

13.5 Operation Encompass

[Operation Encompass](#) operates in the majority of police forces across England. It

helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information

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about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

13.6 National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [SafeLives: young people and domestic abuse.](#)

14. Homelessness

14.1 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.

14.2 The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

14.3 In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's

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social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation [here](#).

15. Children missing from education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of College unauthorised absence protocols and children missing from education procedures.

16. Serious violence

16.1 All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above).

16.2 All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's [Preventing youth violence and gang involvement](#) and it's [Criminal exploitation of children and vulnerable adults: county lines](#) guidance.

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17 Mental Health

17.1 Staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

17.2 Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education 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.

17.3 Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children’s experiences, can impact on their mental health, behaviour, and education.

17.4 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](#)

17.5 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

18 Modern Slavery and the National Referral Mechanism

18.1 Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

18.2 Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

19 Cybercrime

19.1 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 a school’s computer network to look for test paper answers or change grades awarded;

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- 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; and,
- 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.

19.2 Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

19.3 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. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. 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.

19.4 Additional advice can be found at: [Cyber Choices](#), [‘NPCC- When to call the Police’](#) and [National Cyber Security Centre - NCSC.GOV.UK](#)

20. Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children’s confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

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21. Children and the court system

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 guides explain each step of the process, support and special measures that are available.

There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

22. Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

23. Abuse of Vulnerable Adults (Source: Care Act 2014)

23.1. Physical abuse – including assault, hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate physical sanctions.

23.2. Domestic violence – including psychological, physical, sexual, financial, emotional abuse, so called ‘honour’ based violence.

23.3. Sexual abuse – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual

acts to which the adult has not consented or was pressured into consenting.

23.4. Psychological abuse – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyberbullying, isolation or unreasonable and unjustified withdrawal from services or supportive networks.

23.5. Financial or material abuse – including theft, fraud, internet scamming, coercion in relation to an adult’s financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of

property, possessions or benefits.

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23.6. **Modern Slavery** – encompasses slavery, human trafficking, and forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

23.7. **Discriminatory abuse** – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.

23.8. **Neglect and acts of omission** – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

23.9. **Self-Neglect** – this covers a wide range of behaviour neglecting to care for one’s personal hygiene health or surroundings and includes behaviour such as hoarding.

23.10. **Radicalisation** – The College addresses the Prevent agenda by working closely with the police and specialist teams over matters related to students and staff concerning violent extremism and radicalisation.

23.11 **Serious Violent Crime:** All staff should be aware of the indicators that may signal that children are at risk from, or involved in, serious violent crime. These may include increased absence from college, a change in friendships or relationships with older people or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions may also indicate that children have been approached by, or are involved with individuals associated with criminal networks or gangs.

23.12 **Upskirting:** ‘Upskirting’ typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

24. Early Help

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);

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- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

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APPENDIX 3: ROLE OF DSL (FROM KCSIE 2022)

Governing bodies and proprietors should ensure an appropriate **senior member** of staff, from the school or college **leadership team**, is appointed to the role of designated safeguarding lead (DSL) The DSL should take **lead responsibility** for safeguarding and child protection (including online safety). This should be explicit in the role holder’s job description.

This person should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and interagency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.

Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the DSL and the role should be explicit in their job description. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSL, this lead responsibility should not be delegated.

Availability

During term time the DSL (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the DSL lead, to define what “available” means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and colleges and the DSL to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

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Manage referrals

The DSL is expected to refer cases:

- of suspected abuse and neglect to the local authority children’s social care as required and support staff who make referrals to local authority children’s social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the Police as required. [NPCC - When to call the police](#) should help understand when to consider calling the police and what to expect when working with the police.

Working with others

The DSL is expected to:

- act as a source of support, advice and expertise for all staff;
- act as a point of contact with the safeguarding partners;
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the “case manager” (as per Part 4 KCSIE 2022) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically;
- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;

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- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes:
 - ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
 - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information sharing and managing the child protection file

The DSL is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSIE 2022.

Where children leave the school or college (including in year transfers) the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

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Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising Awareness

The DSL should:

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff;
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

Training, knowledge and skills

The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

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- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;¹
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and,

¹ Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children.

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- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training should support the DSL in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that children feel heard and understood. Therefore, the DSL should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts 1, 2 and 5 of KCSIE 2022, and therefore the DSL should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between

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- primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

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