



Policy Statements and Procedures

SAFEGUARDING and CHILD PROTECTION POLICY

All children have the same protection regardless of gender, ethnicity, religious beliefs, sexual orientation, gender identity or disability.

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1. INTRODUCTION

Please note that parents, guardians and carers are referred to as 'parents', and Colleges within The Rosedale Hewens Academy Trust are referred to as 'the College' throughout this policy.

The Rosedale Hewens Academy Trust (The Trust) fully understands the contribution it must make to protect children, support students across The Trust and promote a safeguarding culture. The aim of the policy is to safeguard and promote students' welfare, safety and health by fostering an honest, open, caring, proactive and supportive environment in which all students can achieve their full potential. The Trust is committed to ensuring all staff are trained and supported to respond appropriately and sensitively to child protection concerns.

Hewens College, a college within The Rosedale Hewens Academy Trust, is committed to providing an excellent educational experience for all its students. We believe that a child's safety and well-being is key to achievement. Safeguarding and child protection concerns, and referrals will be handled sensitively, professionally and in ways that support the needs of the child. We recognise that parents have a vital role to play in their child's safety and well-being and that there is a need to establish strong home/college links and communication systems that can be utilised whenever there are concerns about child protection.

All staff should be considering the context within which incidents and/or behaviours can occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life, that are a threat to their safety and/or welfare. In adopting a robust 'Contextual Safeguarding' approach, we aim to recognise that children and young people risk experiencing significant harm in extra-familial contexts. We seek to include these contexts within prevention, identification, assessment, intervention through early help processes and safeguarding measures.

The statutory government guidance Keeping Children Safe in Education 2021, defines safeguarding and promoting the welfare of children as:

- Protecting children from maltreatment;
- 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;
- Taking action to enable all children to have the best outcomes.

All members of staff are required to read Part 1 and Annex A of Keeping Children Safe in Education 2021. Safeguarding is

everyone's responsibility. Everyone who comes into contact with children and families has a role to play'.

Hewens College recognises its duty is to safeguard and promote the care and welfare of all its students. This includes children who are in need (Section 17, Children Act 1989) and children who are at risk of significant harm (Section 47, Children Act 1989).

This Safeguarding Child Protection Policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2021) and Working Together to Safeguard Children (2018), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of students at the College
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM May 2016 to reflect the publication of statutory guidance on FGM; in February 2019 with some minor amendments
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to the Safeguarding and Welfare Requirements in the Statutory Framework for the Early Years Foundation Stage (2017).
- This policy has been written with reference to the London Child Protection Procedures (5th Edition 2017, Updated June 2019). <https://www.londoncp.co.uk/index.html>
- This policy also complies with our funding agreement and articles of association
- Children and Families Act (2014)
- Special Educational Needs and Disability (SEND) Code of Practice (January 2015)
- Safeguarding Vulnerable Adults Groups Act (2006)
- Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018)

Confidentiality

The College's approach to confidentiality and data protection with respect to safeguarding is in line with all GDPR (General Data Protection Regulations May 2018), Children Act 1989 and Children Act 2004 section 11. Note that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and

individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information. If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or LSO)

The 7 'Golden Rules' to Information Sharing

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to-date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

We recognise that child protection is the responsibility of all staff. We will ensure that all parents and other working partners are aware of our Safeguarding and Child Protection Policy by mentioning it in the College prospectus, displaying appropriate information in the College reception and by raising awareness at meetings with parents. Our students' welfare is of paramount importance.

This policy should be read in conjunction with The Rosedale Hewens Academy Trust Prevent Strategy.

2. POLICY OBJECTIVES

The four main elements that ensure this policy is fully and effectively implemented are:

- **Prevention:** For example, following safer recruitment practices; supportive college atmosphere; teaching and pastoral support available to students, PSHE curriculum teaches students to keep themselves safe, regular workshops on internet safety, knife crime and gang culture.
- **Protection:** For example, following agreed policies and procedures and monitoring their implementation and effectiveness; by ensuring staff are trained and supported appropriately and sensitively in child protection and safeguarding matters; by encouraging open communication.
- **Support:** Appropriate support will be offered to students and staff who make disclosures or voice concerns. The College will outline carefully the process that will follow for handling a complaint and will offer counseling or other pastoral support as necessary.
- **Equality:** All students have the same protection regardless of gender, ethnicity, religious beliefs, sexual orientation or identity (LGBT) or disability. The United Nations Convention on the Rights of the Child (UNCRC) is a legally-

binding international agreement setting out the civil, political, economic, social and cultural rights of every child, regardless of their race, religion or abilities.

The main objectives of this policy are:

- To prevent abuse;
- To protect students;
- To provide appropriate support to students and staff;
- To work with parents to ensure appropriate communications and actions are undertaken. Where necessary, referring any concerns to children's Social Care or other agencies for further investigation so that children at risk can be identified quickly. This procedure is intended to protect children from abuse. In the event of the College referring a concern to Children's Social Care it is not accusing parents or other individuals of abuse, but requesting that further investigation takes place to establish whether a child is at risk;
- To provide clear direction to staff and others about expected behaviour in managing and dealing with child protection issues and concerns;
- To resolve child protection concerns and incidents in a professional and sensitive manner.

3. PRINCIPLES

Where the Governing Body provides services or activities directly under the supervision or management of college staff, the College's arrangements for safeguarding and child protection will apply. Where another body provides services or activities separately, the Governing Body must seek assurance that the body concerned has appropriate policies and procedures in place to safeguard and protect students and there are arrangements to liaise with the College on these matters where appropriate.

The College adopts an open and accepting attitude towards students as part of its responsibility for pastoral care. Staff hope that students and their parents will feel free to talk about any concerns and will see college as a safe place when there are difficulties. Students' worries and fears will be taken seriously and students are encouraged to seek help from members of staff.

The College:

- Maintains an ethos where students feel secure and are encouraged to talk, and are listened to;
- Ensures that students know there are adults in their college whom they can approach if they are worried or are in difficulty;
- Includes in the curriculum, activities and opportunities for PSHE/Citizenship which equip students with the skills they need to stay safe from abuse, and which will help them develop realistic attitudes to the responsibilities of adult life, including the importance of e-safety in an increasingly digital world;
- Ensures every effort is made to establish effective working relationships with parents and colleagues from other agencies;
- Ensures all staff are trained and supported to respond appropriately and sensitively to child protection concerns;
- Operates safe recruitment procedures and makes sure that all appropriate checks are carried out on new staff and volunteers who are to work with students, including Disclosure and Barring Service and Barred List checks, and maintain a single, central record of these checks. Additional checks include scrutinizing applicants, verifying identity and academic or vocational qualifications, obtaining professional references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. The College follows statutory guidance in particular, the Department of Education's 'Safeguarding Children and Safer Recruitment in Education' (January 2007). All appropriate measures are applied in relation to everyone involved who is likely to be perceived by the students as a safe and trustworthy adult including, for example, volunteers and staff employed by contractors.

4. PROCEDURES

Where it is believed that a child is suffering from, or is at risk of, significant harm, we will follow the procedures set out in the document produced by the Safeguarding Partnerships of the London Borough of Hillingdon.

It is recognised by the College that students who are abused or who witness violence may find it difficult to develop a sense

of self-worth and to view the world in a positive way. The College may be the only stable, secure and predictable element in the lives of children at risk. However, whilst at college, a child's behaviour may become challenging and therefore require intervention to support their learning and development. There may be circumstances where suspension or exclusion from college may need to be considered, in line with our Behaviour for Learning Policy.

It is also recognised that some students who have experienced abuse may in turn abuse others. This requires a considered, sensitive approach in order that the child can receive appropriate help and support.

The College will endeavour to support students through:

- The curriculum, to encourage self-esteem and self-motivation;
- The College ethos, which promotes a positive, supportive and secure environment and which gives all students and adults a sense of being respected and valued;
- The implementation of student behaviour management policies and procedures;
- A consistent approach, which recognises and separates the course of behaviour from that which the child displays. This is vital to ensure that all students are supported within college;
- Regular liaison with other professionals and agencies who support students and their families;
- A commitment to develop productive, supportive relationships with parents whenever it is in the child's interest to do so;
- The development and support of responsible and knowledgeable staff trained to respond appropriately in child protection situations.

In addition to that mentioned above this policy should also be considered alongside other related policies and documents e.g. The Trust Prevent Strategy, Special Educational Needs Policy, Health and Safety Policy etc. We recognise that, statistically, students with behavioural difficulties and disabilities are most vulnerable to abuse. Staff who work, in any capacity, with students with profound and multiple disabilities, sensory impairment and/or emotional and behavioural problems will need to be particularly sensitive to signs of abuse. It must also be stressed that in a home environment where there is domestic violence, drug or alcohol abuse, students may also be vulnerable and in need of support or protection.

Training

On behalf of the Rosedale Hewens Academy Trust, the Lead Safeguarding Officer will ensure that all staff receive appropriate safeguarding and child protection training which is regularly updated and in line with advice from the 3 Safeguarding Partners. In addition, all staff members will receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings). This will ensure that staff are provided with the relevant skills and knowledge to safeguard students effectively, as required.

All new staff members will undergo safeguarding and child protection training at induction. This will include training on the College's safeguarding and child protection policy, online safety, the code of conduct/staff behaviour policy, the behaviour policy, the safeguarding response to students who go missing from education, and the role of the designated safeguarding lead. The Trust will ensure that an accurate record of safeguarding training undertaken by all staff is maintained and updated regularly.

Professional Confidentiality

Confidentiality is an extremely important part of Safeguarding and Child Protection and needs to be fully understood by all those working with children. Parents and every adult working in, or associated with the College should discuss any Child Protection concerns with the Designated Safeguarding Lead or Lead Safeguarding Officer. Specific cases must not be discussed with other members of the College in order to protect an individual's confidentiality. However, general guidance or procedural clarification should be sought from the Principal.

If a student asks for confidentiality the response should be: "I cannot guarantee confidentiality and anything you tell me may have to be passed on to the Designated Safeguarding Lead or other designated members of staff". This provides a consistent response, allows the student to decide whether or not to share the information with the member of staff and enables the member of staff to clarify what will happen next. If the student decides not to share the confidence with the member of staff they should still pass on any concerns he/she might have had to the Designated Safeguarding Lead and Lead Safeguarding Officer, for example if the student had any obvious, visible bruising or part disclosed any information.

Procedure to follow on Disclosure by a Student

It is recognised that a child may seek to share information about abuse or neglect with a member of staff, or talk spontaneously individually or in groups when a member of staff is present. In these situations, staff must:

- Listen carefully to the child. DO NOT directly question the child;
- Give the child time and attention;
- Allow the child to give a spontaneous account; do not stop a child who is freely recalling significant events;
- Make an accurate record of the information you have been given taking care to record the timing, setting and people present, the child's presentation as well as what was said;
- Explain that you cannot promise not to speak to others about the information they have shared – but explain what confidentiality means;
- Reassure the child that they have done the right thing in telling you;
- Tell the child what you are going to do next and explain that you will need to get help to keep him/her safe;
- Do not ask the child to repeat his or her account of events to anyone;
- Inform and immediately send a Record of Concern form to the Designated Safeguarding Lead and Lead Safeguarding Officer.

Record of Concern form

All information should be written down and the Record of Concern form completed in full. This form should be completed by anyone who has a concern regarding the welfare or protection of a student. Staff should complete an electronic copy of the form. This should then immediately be emailed directly to the Designated Safeguarding Leads and copied to the Trust's Lead Safeguarding Officer.

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For all parents, carers, guardians and visitors, please ask at reception for a paper copy. This form should then be placed in a sealed envelope. Marked as 'Strictly Confidential' and passed immediately to the relevant member of staff.

The Designated Safeguarding Lead having read the information, will discuss the contents with the student in question. They will then either seek advice from the Lead Safeguarding Officer, and/or make a referral to Children's Social Care under Child Protection procedures. Parents will be informed of any actions taken following a disclosure, however there may be circumstances where this may not be appropriate. Generally, personal information would only be disclosed to third parties, including other agencies, with the consent of the student (General Data Protection Regulations, May 2018). In some circumstances consent may not be possible or desirable but the safety and welfare of a student dictate that the information should be shared. The law permits the disclosure of confidential information necessary to safeguard a child or children. Disclosure should be justifiable in each case, according to the particular facts of the case and if, in doubt, legal advice would be sought.

The College follows the guidance contained within 'Information Sharing: Guidance for practitioners and managers'. Only the Principal, Executive Principal or Chief Operating Officer can give permission for information to be shared.

Conversations with a student who discloses abuse need tact and sensitivity. He/she may already be under severe emotional stress and need reassuring. It is important that, after the disclosure, only the Designated Safeguarding Lead or Lead Safeguarding Officer undertakes subsequent conversations.

Abuse and Neglect

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Students may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

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

Emotional Abuse

Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. It may involve conveying to a child that he/she is worthless or unloved, inadequate, or valued only insofar as she meets the needs of another person. Additionally, a child may also suffer adverse effects when put under excessive pressure to achieve. It may involve causing a child frequently to feel frightened or in danger, or the exploitation or corruption of a child. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone. Domestic violence, adult mental health concerns and parental substance misuse may expose a child to emotional harm.

Signs and Symptoms of Emotional Abuse include:

- Physical, mental and emotional development delays.
- Self-harm.
- Sudden speech disorders.
- Continual self-depreciation ('I'm stupid, ugly, worthless, etc.').
- Overreaction to mistakes.
- Extreme fear of any new situation.
- Inappropriate response to pain ('I deserve this').
- Neurotic behaviour (rocking, hair twisting, self-mutilation).
- Extremes of passivity or aggression.
- Neglect.
- Constant hunger.
- Poor personal hygiene.
- Constant tiredness.
- Poor state of clothing.
- Emaciation.
- Untreated medical problems.
- A lack of social relationships.
- Compulsive scavenging.
- Destructive tendencies.

Neglect

The persistent failure to meet a child's physical, emotional and/or psychological needs, likely to cause significant harm. It may involve a parent failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, failing to ensure access to appropriate medical care or treatment, lack of stimulation or lack of supervision.

Physical signs of neglect include: poor or faltering growth, recurrent infections, unkempt dirty appearance, inadequate clothing, unmanaged/untreated medical conditions, hunger, no regular meal times.

Developmental signs of neglect include: developmental delays, poor attention or concentration, lack of self-confidence/or poor self-esteem and educational underachievement.

Behavioural signs of neglect include: overactive, aggressive, impulsive, indiscriminate friendliness, withdrawn, poor social skills/relationships, bedwetting or soiling, destructive behaviours, substance misuse, running away, sexual promiscuity, self-harm, risk-taking behaviours, erratic or non-college attendance.

Home environment signs of neglect include: dirty, hazardous environment, no routines, poor state of bedding, lack of play opportunities.

Sexual Abuse

The forcing or enticing a child to take part in sexual activities. The sexual activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving students to look at, or in the production of, pornographic material or watching sexual activities or encouraging students to behave in sexually inappropriate ways.

Signs or Symptoms of Sexual Abuse Include:

- Being overly affectionate or knowledgeable in a sexual way inappropriate to the student's age.
- Medical problems such as chronic itching, pain in the genitals, venereal diseases.
- Other extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia.
- Personality changes such as becoming insecure or clinging.
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys.
- Sudden loss of appetite or compulsive eating.
- Being isolated or withdrawn.
- Inability to concentrate.
- Lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or child minder.
- Starting to wet/soil again, day or night/nightmares.
- Become worried about clothing being removed.
- Suddenly drawing sexually explicit pictures.
- Trying to be 'ultra-good' or perfect; over-reacting to criticism.

Physical Abuse

The deliberate physical injury to a child, or the willful or neglectful failure to prevent physical injury or suffering. This also includes fabricating illness and failure to seek medical attention when appropriate. Other forms of physical abuse or harm include the following. Hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, confinement to a room or cot, or inappropriately giving drugs to control behaviour. Signs or Symptoms of Physical Abuse Include:

- Unexplained recurrent injuries or burns.
- Improbable excuses or refusal to explain injuries.
- Wearing clothes to cover injuries, even in hot weather.
- Refusal to undress for gym.
- Bald patches.
- Chronic running away.
- Fear of medical help or examination.
- Self-destructive tendencies.
- Aggression towards others.
- Fear of physical contact - shrinking back if touched.
- Admitting that they are punished, but the punishment is excessive (such as a child being beaten every night to 'make him study').
- Fear of suspected abuser being contacted.

Domestic Abuse

The cross-government definition of domestic violence and abuse is:

- Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

All students can witness and be adversely affected by domestic abuse in the context of their home life, where domestic abuse can occur between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on students. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Domestic abuse can include:

- sexual abuse and rape (including within a relationship)
- punching, kicking, cutting, hitting with an object
- withholding money or preventing someone from earning money
- taking control over aspects of someone's everyday life, which can include where they go and what they wear, not letting someone leave the house
- reading personal correspondence i.e. emails, text messages or letters
- threatening to kill or harm them, a partner, another family member or pet.

Witnessing and experiencing domestic abuse

Domestic abuse always has an impact on students. Being exposed to domestic abuse in childhood is child abuse. Students may experience domestic abuse directly, but they can also experience it indirectly by:

- hearing the abuse from another room
- seeing a parent's injuries or distress afterwards
- finding disarray like broken furniture
- being hurt from being nearby or trying to stop the abuse
- experiencing a reduced quality in parenting as a result of the abuse (Royal College of General Practitioners and NSPCC, 2014; Holt, Buckley and Whelan, 2008).

Recognising domestic abuse

- Domestic abuse can happen in any relationship. It can continue even after the relationship has ended, for example during contact visits or on social media.
- Both men and women can be abused or be abusers.

Signs and indicators

It can be difficult to tell if domestic abuse is happening, because perpetrators can act very differently when other people are around. Students who experience domestic abuse may:

- display behaviour that others perceive to be challenging
- suffer from depression and anxiety
- not do as well at college as usual.

Signs of anxiety

Students who experience domestic abuse may feel on constant alert. Signs of anxiety or fear-related behaviour include:

- bed wetting or unexplained illness
- running away from home
- constant worry about possible danger or safety of family members
- aggression towards others.

Domestic abuse is an incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer. Sadly, domestic abuse is very common. In the vast majority of cases, it is experienced by women and is perpetrated by men.

Domestic abuse can include, but is not limited to, the following:

- Coercive control – a pattern of intimidation, degradation, isolation and control with the use or threat of physical or sexual violence. When an abuser uses a pattern of behaviour over time to exert power and control. It is a criminal offence. *Coercive control is at the heart of domestic abuse.*

- Psychological and/or emotional abuse – includes name-calling, threats and manipulation, blaming you for the abuse or ‘gaslighting’ you.
- Physical or sexual abuse – not only hitting. They might restrain you or throw objects. They might pinch or shove you and claim it’s a ‘joke’. They might manipulate or coerce you into doing things you don’t want to do.
- Financial or economic abuse – controlling your access to money or resources. They might take your wages, stop you working or put you in debt.
- Harassment and stalking – a pattern of persistent and unwanted attention that makes you feel pestered, scared, anxious or harassed.
- Online or digital abuse – they might send abusive texts, demand access to your devices, track you with spyware, or share images of you online.

Operation Encompass

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

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.

Mental Health

Mental health affects all aspects of a child’s development including their cognitive abilities, their social skill and their emotional wellbeing. The College recognises that students may experience mental health difficulties and therefore provide a range of pastoral support (medical and non-medical) to students who may need help and support.

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where students 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 students’s experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

Childhood and adolescence are when mental health is developed and patterns are set for the future. For most students the opportunities for learning and personal development offered at college are exciting and challenging and an intrinsic part of their educational experience. However, they can also give rise to anxiety and stress whereby anxiety or stress owing to circumstances outside college. It is important not to label as ‘mental health’ problems which are in reality normal emotional reactions to new experiences.

A number of students may experience emotional or psychological difficulties, that without appropriate professional support are more persistent and inhibit their ability to participate fully in college and in other aspects of life. In addition, some students may arrive at college with a pre-existing psychological problem. Mental health problems can seriously impair academic performance and may lead to confused or anxious behaviour.

Minor difficulties that interfere with a child’s capacity to work may also result in distress and wasted effort and undermine academic progress. A more seriously affected child may require a significant level of professional support. Students do suffer from depression. Whilst the suicide rate among teenagers is below that in the general population, young people are vulnerable to suicidal feelings.

Identifying Self Harm

Self-harm is defined by the National Institute of Clinical Excellence Guidelines (2004) as an “expression of personal distress, usually made in private, by an individual who hurts him or herself”. Essentially, self-harm is any behaviour where the intent is to cause harm to oneself (Multi Agency Guidelines for Professionals Working with Children and Young People Who Self-Harm, January 2012). There are several ways in which a staff member might discover that a student is self-harming. A staff member may witness or be informed of student self-harm by the student themselves or a friend. A staff member may suspect a student has self-harmed which may mean that they are in need of immediate medical attention, or it may be recent or historical. A student might self-disclose self-harm, recent or previous, or a friend may disclose information. A student may disclose thoughts of self-harm or a friend may disclose this.

Signs and symptoms are sometimes absent or easy to miss. It is not uncommon for individuals who self-harm to offer stories which seem implausible or which may explain one, but not all, physical signs. If a student says they are not self-harming or evades the question, you can keep the door open by reminding them that you are always available to talk about anything, should they so wish. Try to stay connected to the student and look for other opportunities to ask, particularly if there are continuing signs that your suspicion is correct. Below is a non-exhaustive list of some of the behaviours that some people might consider to be self-harm:

- Scratching or picking skin
- Cutting body
- Tying something around body
- Inserting things into body
- Scouring/scrubbing body excessively
- Hitting, punching self
- Pulling out hair
- Over/under eating
- Excessive drinking of alcohol
- Taking non-prescription drugs
- Burning or scalding body
- Hitting walls with head
- Taking an overdose or swallowing something dangerous
- Self-strangulation
- Risky behaviours such as running into the road

As most self-harm is privately or secretly carried out it can be hard to notice that a young person is self-harming but some signs to look out for are:

- Changes in clothing to cover parts of the body, e.g. wearing long sleeved tops
- Reluctance to participate in previously enjoyed physical activities, particularly those that involve wearing shorts or swimsuits, for example
- Changes in eating and/or sleeping habits
- Changes in consumption of drugs/alcohol
- Changes in levels of activity or mood
- Increasing isolation from friends/family

Honour Based Violence (HBV)

Honour-based violence (HBV) is the term used to refer to a collection of practices used predominantly to control the behaviour of women and girls within families or other social groups in order to protect supposed cultural and religious beliefs, values and social norms in the name of ‘honour’. HBV incidents and crimes include specific types of offence, such as forced marriage (FM) and female genital mutilation (FGM), breast ironing and acts which have long been criminalised, such as assault, rape and murder. We use HBV to refer to the full range of incidents and crimes which perpetrators carry out under the guise of maintaining or protecting perceived ‘honour’.

Female Genital Mutilation (FGM) and Honour Based Violence (HBV)

Female genital mutilation has been a criminal offence since the Prohibition of Female Circumcision Act 1985 came into force. The 1985 Act was replaced by the Female Genital Mutilation Act 2003. In 2003 it also became a criminal offence for UK nationals or permanent UK residents to take their child abroad to have female genital mutilation. Anyone found guilty

of the offence faces a maximum penalty of 14 years in prison.

On 31 October 2015 a new duty was introduced that requires health and social care professionals and teachers to report 'known' cases of FGM in girls aged under 18 to the police. This duty applies to teachers who are informed by a girl under 18 that an act of FGM has been carried out on her, observe physical signs which appear to show that an act of FGM has been carried.

So-called honour based violence covers crimes which have been committed to protect or defend the honour of the family or community and includes FGM, forced marriage and other practices. All forms of so-called HBV are abuse and will be treated as such in college. For more information, please refer to the Department for Education's statutory guidance Keeping Children Safe in Education, September 2019. The College provides training for its staff in recognising concerns relating to HBV and in recognising students who might be vulnerable to falling victim to HBV.

FGM: All staff must be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There are a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practice FGM. Signs that a female student is at risk of FGM include:

- She has a parent from a practicing community;
- She and her family have a low level of integration into a community;
- The mother or any sisters have experienced FGM;
- She is withdrawn from PSHE;
- She has talked about, or you know about, the arrival of a female family member;
- She talks about it to other students;
- She refers to a 'special procedure' or 'special occasion' or 'become a woman';
- She is out of the country for a prolonged period;
- She is taking a long holiday to her country of origin or another country where the practice is prevalent (parents may talk about it too);

Signs that a female student has suffered FGM:

- She has problems walking, standing and/or sitting;
- She spends a lot of time in the toilet;
- She has bladder or menstrual problems;
- She has prolonged or repeated absences from college;
- She has a reluctance to undergo medical examinations;
- She is asking for help but giving a lack of explicit information.

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

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

Child Sexual Exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

- a) in exchange for something the victim needs or wants, and/or

- b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual, it 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)

Indicators

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

How to spot CSE

Sexual health

Absent from school

Familial abuse

Emotional and physical condition

Gangs activity

Use of technology and sexual bullying

Alcohol and drug misuse

Receipt of unexplained gifts or money

Distrust of authority figures

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity

- a) in exchange for something the victim needs or wants, and/or
- b) for the financial or other advantage of the perpetrator or facilitator and/or
- c) through violence or the threat of violence.

A victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE:

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

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with students and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Students can be targeted and recruited into county lines in a number of locations including colleges, further and higher educational institutions, student referral units, special

educational needs colleges, children's homes and care homes. Students are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Students can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes, (both from home and college), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Sharing of nudes and semi-nudes (Sexting)

The College considers sexting as inappropriate and unsafe behaviour, which threatens the social, emotional and/or physical safety of students. Although sharing of nudes and semi-nudes is typically voluntary at first, it raises many serious legal and social concerns, especially when the images are spread beyond the control of the sender. Sharing of nudes and semi-nudes can result in humiliation, bullying and harassment of students. The College has a responsibility to prevent sharing of nudes and semi-nudes and the dissemination of inappropriate or offensive material and to educate both students and staff about both the legal and social dangers of sharing of nudes and semi-nudes.

The term 'sexting' is derived from texting and refers to the sending of sexually provocative material (including photos, videos and sexually explicit text) from modern communication devices or applications, such as mobile phones, tablets, email, social networking sites and instant messaging services.

Legal Implications for Students regarding Sexting (sharing of nudes and semi-nudes)

Sharing of nudes and semi-nudes (Sexting) or youth produced imagery may breach laws that prohibit the creation, distribution or possession of child pornography regardless of whether all parties involved consent to the images being taken and shared, or whether the images are sent to other minors, even minors of the same age.

The Commonwealth Crimes Legislation Amendment (Sexual Offences Against Children) Act 2010 impacts upon sexting as a criminal offence. Persons over 18 years of age who transmit indecent material to persons under the age of 16 may face criminal charges. Sharing of nudes and semi-nudes (Sexting) may well be an offence if the material is considered indecent according to the standards of ordinary people.

Sharing of nudes and semi-nudes (Sexting) may also fall under 'sexual harassment' under the Commonwealth Sex Discrimination Act 1984 or if more than one 'sext' is sent to a recipient this may also constitute unlawful stalking in some jurisdictions.

Sharing of nudes and semi-nudes (Sexting) may also be considered a form of cyber bullying when nude or sexually suggestive images are uploaded and shared on the Internet, for example on Facebook. This is especially the case where images are shared past the intended audience or when accompanied by nasty comments.

All staff members are required to notify the Vice Principal immediately upon becoming aware that sharing of nudes and semi-nudes by a student is likely to have occurred. The allegation will first be investigated and the parents of all students involved will be contacted. Staff members are not permitted to forward, copy or print any sharing of nudes and semi-nudes images, however, if the nature of the sharing of nudes and semi-nudes is deemed to be of a serious nature, the Police will be contacted and the sharing of nudes and semi-nudes will be reported.

Peer on Peer Abuse

This can take many forms and should not be passed off as a normal part of growing up (for example, bullying through social media). Students will be educated about peer on peer abuse as part of their PSHE programme. Sexual violence and sexual harassment can occur between two students of any age and sex. It can also occur through a group of students sexually assaulting or harassing a single child or group of students. All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical and sexual abuse
- sexual harassment and violence
- emotional harm
- on and offline bullying
- teenage relationship abuse
- sharing of nudes and semi-nudes (also known as 'youth produced sexual imagery' and 'sexting');
- initiation/hazing type violence and rituals.

Peer on peer abuse can even include grooming students for sexual and criminal exploitation. This will, in all likelihood, adversely affect their wellbeing and educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

It is important that all victims of peer and peer abuse are taken seriously and offered appropriate support. Staff should all be aware that some groups are potentially more at risk. Evidence shows girls, students with SEND and LGBTQ+ students are at greater risk.

Dealing with peer on peer abuse and sexual harassment

What to look for

Peer-on-peer abuse is a complex issue and will have varied warning signs. However, staff should be alert to:

- Changes in behaviour or demeanour; for example, a child becoming withdrawn
- Signs of depression or anxiety
- Avoidance of particular individuals
- Unexplained injuries
- Unusually poor performance at college
- Sudden development of sexualised behaviour or language
- Exclusion or isolation from peers

What to do

- Report all incidents of peer on peer abuse and sexual harassment in line with our Behaviour and Relationship Policy, Anti-bullying and Safeguarding and Child Protection Policy or using the Record of Concern Form on the staff intranet.
- Never pass incident off as "banter", "part of growing up" or "having a laugh"
- Recognise the gendered nature of peer-on-peer abuse (that girls will more likely be victims and boys more likely be perpetrators), but that all forms are unacceptable and will be taken seriously
- If you or another member of staff think a child is in immediate danger, call 999

What the College will do

- Include training on Peer on Peer abuse and sexual harassment in staff meetings and briefings and we will include this within our annual professional learning calendar
- Ensure that staff are aware that safeguarding issues can manifest via peer-on-peer abuse and that they know the college's policy and procedures with regards to this issue
- Ensure students are taught about what constitutes acceptable behaviour and learn about topics such as healthy and respectful relationships, self-esteem and gender roles. Ensure that they understand the consequences of peer-on-peer abuse, and address any culture of abuse, of any form, that may develop

Vulnerable Children

While we are fully aware that peer-on-peer abuse can affect **all** students, research shows that some are particularly vulnerable:

- Young people aged 10 or over
- Girls and young women, with boys and young men more likely to be identified as abusers
- Boys and young men in gang-affected neighbourhoods
- Those with a history of abuse within their families
- Young people in care
- Those who have experienced loss through bereavement
- Students with special educational needs and disabilities
- LGBT Studies have also found that black and ethnic minority students are often under-identified as victims and over-identified as perpetrators.

Allegations of abuse made against other students

We recognise that students are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously. Most cases of students hurting other students will be dealt with under our college’s behaviour and relationships policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in the college at risk
- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up-skirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

Procedures for dealing with allegations of peer-on-peer abuse

If a student makes an allegation of abuse against another student:

- You must record the allegation and tell the DSL and LSO, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL and LSO will put a risk assessment and support plan into place for all students involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

Creating a supportive environment in college and minimising the risk of peer-on-peer abuse

We recognise the importance of taking proactive action to minimise the risk of peer-on-peer abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate students about appropriate behaviour and consent
- Ensure students are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously

Ensure staff are trained to understand:

- How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports

- That even if there are no reports of peer-on-peer abuse in college, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
- That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example: Students can show signs or act in ways they hope adults will notice and react to
- A friend may make a report
- A member of staff may overhear a conversation
- A child’s behaviour might indicate that something is wrong
- That certain students may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

Further information can be found in the Department for Education’s guidance, Sexual Violence and Sexual Harassment between children in Schools and Colleges (September 2021).

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 students of any age and sex
- Through a group of students sexually assaulting or sexually harassing a single child or group of students
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap. Students 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 college.

If a victim reports an incident, it is essential that staff make sure they 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.

Some groups are potentially more at risk. Evidence shows that girls, students with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) students 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
- 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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the reporting procedures and complete a Record of Concern form and send this immediately to the DSL and LSO.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from college
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing

- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation)

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from college
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a student being involved in, or at risk of, serious violence, they will report this to the DSL and LSO.

Children Looked After and previously Children looked after

The most common reason for children becoming looked after is as a result of abuse and/or neglect. Governing bodies of maintained colleges and proprietors of academies should ensure that staff have the skills, knowledge and understanding necessary to keeping Children looked after safe.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously Children looked after safe. When dealing with Children looked after and previously looked after children, it is important that all agencies work together and prompt action is taken on concerns to safeguard these children, who are a particularly vulnerable group.

In particular, they should ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The Designated Safeguarding Lead, through the designated teacher for looked after children, should have details of the child's social worker and the name of the virtual college head in the authority that looks after the child. Colleges must appoint a designated teacher for Looked After Children. On commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers will have responsibility for promoting the educational achievement of students who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

Gangs

Defining what constitutes a 'gang' can be difficult, partly because its characteristics are known to change over time and locality. Being part of a friendship group is a normal part of growing up and it can be common for groups of children and young people to gather together in public places to socialise. These groups should be distinguished from 'gangs' for whom crime and violence are a core part of their identity, although 'delinquent peer groups' can also lead to antisocial behaviour and youth offending.

Hallsworth & Young (2004), distinguished gangs from urban collective groups, into the following:

Peer Group: a small, unorganized, transient group of students who 'hang out together' in public places such as shopping centres. Crime is not integral to their self-definition;

Wannabee Group: includes students who band together in a loosely structured group primarily to engage in spontaneous social activity and exciting, impulsive criminal activity, including collective violence against other groups of students. Wannabees will often claim 'gang' territory and adopt 'gang-style' identifying markers of some kind;

Gangs: a relatively durable, predominantly street-based group of students who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity. Students may be involved in more than one 'gang', with some cross-border movement and may not stay in a 'gang' for significant periods of time. Students rarely use the term 'gang', instead they used terms such as 'family', 'breddrin', 'crews', 'cuz' (cousins), 'my boys' or simply 'the people I grew up with';

Organised criminal group: members are professionally involved in crime for personal gain, operating almost exclusively in the 'grey' or illegal marketplace.

Indicators of Gang Involvement:

- Child withdraws from family.
- Sudden loss of interest in college.
- Decline in attendance or academic achievement.
- Being emotionally “switched off”, but also containing frustration /rage.
- Starting to use new or unknown slang words.
- Holds unexplained money or possessions.
- Stays out unusually late without reason or breaking parental rules consistently.
- Sudden change in appearance. Dressing in a particular style or ‘uniform’ similar to that of other young people they hang out with, including a particular colour.
- Dropping out of positive activities.
- New nickname.
- Unexplained physical injuries, and/or refusal to seek/receive medical treatment for injuries.
- Graffiti style ‘tags’ on possessions, college books, walls.
- Constantly talking about another young person who seems to have a lot of influence over them;
- Broken off with old friends and hangs around with one group of people.
- Associating with known or suspected gang members, closeness to siblings or adults in the family who are gang
- Starting adopting certain codes of group behaviour e.g. ways of talking and hand signs.
- Expressing aggressive or intimidating views towards other groups of young people, some of whom may have been friends in the past.
- Scared when entering certain areas.
- Concerned about the presence of unknown youths in their neighbourhood.

Children looked after may be vulnerable due to possible low self-esteem, low resilience, attachment issues and the fact that they are often isolated from family and friends. There are risks specific to different types of placements such as secure units, children’s homes, foster homes or living in semi-independent accommodation.

Staff receive training and guidance on recognising signs of gang affiliation and all concerns are to be reported to the College’s Designated Safeguarding Lead.

Early Help

All staff should be aware of the early help process and understand their role within it. This includes providing support as soon as a concern emerges, liaising with the DSL, and sharing information with other professionals in order to support early identification and assessment. Focusing on providing interventions to avoid escalation of worries and needs. In some cases, staff may be asked to act as the Lead Professional in undertaking an early help assessment.

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

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

Children Missing Education (CME)

Children missing education are children of compulsory school age who are not registered students at a college and are not receiving suitable education otherwise than at a college. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

There are many circumstances where a child may become missing from education, but some students are particularly at risk. These include students who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

The College will carry out daily registration and absences will be dealt with in accordance with the College's Attendance Policy. This policy covers those instances where:

- There is a repeated pattern of absence.
- The reason for absence is unclear or unexplained.
- A member of staff has concerns about the nature of a student's absence.

In these instances, the College's Designated Safeguarding Lead should be consulted. They will then consult with the Attendance Officer or the Participation Team at the London Borough of Hillingdon, who will make contact with the family to investigate the absence. The College will make every reasonable attempt and communication to resolve the matter. If a student misses ten consecutive days of college, the College will report this to the local authority.

Where the student has not returned to college for ten days after an authorised absence, or is absent from college without authorisation for twenty consecutive college days, the student can be removed from the admission register when the College and the local authority have failed, after jointly making reasonable enquiries, to establish the whereabouts of the child. This only applies if the College does not have reasonable grounds to believe that the student is unable to attend because of sickness or unavoidable cause.

Where a parent notifies the College that a student will live at another address, the College will record in the admission register:

- The full name of the parent with whom the student will live
- The new address
- The date from when it is expected the student will live at this address

Where a parent of a student notifies the College that the student is registered at another college or will be attending a different college in future, the College must record in the admission register:

- The name of the new college
- The date when the student first attended or is due to start attending that college

The College must notify the local authority when a student's name is to be removed from the admission register at a non-standard transition point under any of the fifteen grounds set out in the regulations, as soon as the ground for removal is met and no later than the time at which the student's name is removed from the register. This duty does not apply at standard transition points, where the student has completed the College's final year, unless the local authority requests for such information to be provided.

Online safety

As schools and colleges increasingly work online, it is essential that students are safeguarded from potentially harmful and inappropriate online material. As such, governing bodies and proprietors will ensure appropriate filters and appropriate monitoring systems are in place.

We recognise the importance of safeguarding students from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our college aims to:

- Have robust processes in place to ensure the online safety of students, staff, volunteers and governors
- Protect and educate the whole college community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole college community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as 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, such as 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
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams. Additional information to support governing bodies and proprietors keep their children safe online (including when they are online at home) is provided in Annex 1 and in the E-Safety Policy.

Opportunities to teach safeguarding

Governing bodies and proprietors will ensure that students are taught about safeguarding, including online safety. Schools and colleges will consider this as part of providing a broad and balanced curriculum. The Government has made regulations which will make the subjects of Relationships for colleges through Relationships Education (for all college students) and Relationships and Sex Education (for all secondary students) and Health Education (for all students in state-funded schools) mandatory from September 2020. Colleges have flexibility to decide how they discharge their duties effectively within the first year of compulsory teaching and are encouraged to take a phased approach (if needed) when introducing these subjects. The Statutory guidance: relationships education relationships and sex education (RSE) and health education, can be found online. Colleges may cover relevant issues through tutorials.

Safeguarding Partners

The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local students, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. NPCC- When to call the police should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

Key Contacts

Named Safeguarding Governor, also for LAC

Local Authority Designated Officer (LADO) Rob Wratten Tel: 01895 250975 Mob: 07919115892 Email: rwratten@hillingdon.gov.uk

Child Protection Adviser to Schools and Deputy LADO Hannah Ives Tel: 01895 250010 Mob: 07753431285 Email: hives@hillingdon.gov.uk

Domestic Abuse Lead for Schools Stella Anaxagorou Mob: 07547951687 Email: sanaxagorou@hillingdon.gov.uk

Prevent Lead and Stronger Communities Manager Fiona Gibbs Email: fgibbs@hillingdon.gov.uk
Axis Phil Skidmore Email: Axis@hillingdon.gov.uk/ 01895277 177

Useful contacts:

Multi Agency Support Hub (MASH) 01895 556633 lbhmash@hillingdon.gov.uk
NSPCC Whistleblowing Helpline 0800 028 0285 help@nspcc.org.uk
Channel Helpline (Prevent) 0207 340 7264 counter.extremism@education.gov.uk
National Domestic Abuse 24 hour Helpline: 0808 2000 247

Recording of Documents

Secure and consistent records are essential to effective child protection practice. The Trust is clear about the need to record any concerns held about students, the status of such records and when these records should be passed over to other agencies.

Concerns about the welfare/behaviour of a student are kept securely. Safeguarding and Child Protection records are kept securely, locked in a separate filing cabinet away from general college records. **Only the Lead Safeguarding Officer, nominated person, the Executive Principal or Principal will have access to these records. Parents and others with parental responsibility may be given access to their child's Child Protection records once appropriate advice has been sought.**

Students who attend college with welfare/behavioural concerns are recorded on the Special Needs register for monitoring purposes or because they already have an Educational Health Care plan. Staff will be alerted to these students via staff briefings and confidential notes are available from the Principal if needed.

The Principal and SENCO collate concerns about individual students, which are not Child Protection related. If concerns increase and Child Protection becomes an issue the procedure outlined earlier is followed. If a student leaves to go to another educational establishment his/her Child Protection records are sent to the accepting college.

Attendance at Child Protection Conferences

The College recognises the need to attend Child Protection case conferences or to send a written report if attendance is not possible. The appropriate member(s) of staff would attend. This should be the Designated Safeguarding Lead or the Lead Safeguarding Officer.

Supporting Students at Risk

Students who are abused or who witness violence may find it difficult to develop a sense of self-worth and to view the world in a positive way. The College may be the only stable, secure and predictable element in the lives of students at risk. Whilst at college, their behaviour may still be challenging and defiant and there may even be moves to consider exclusion. It is also recognised that a minority of students who have experienced abuse may in turn abuse others. This requires a considered, sensitive approach in order that the student can receive appropriate help and support.

Recruitment and Selection of Staff

The Rosedale Hewens Academy Trust's safer recruitment processes are based on the Statutory Guidance: Keeping Children Safe in Education September (2019). The College will provide all the relevant information in references for a member of staff about whom there have been concerns about child protection/inappropriate conduct. Cases in which an allegation has been proven to be unsubstantiated, false or malicious will not be included in employer references. A history of repeated concerns or allegations, which have all been found to be unsubstantiated, malicious etc. will also, not be included in the employment reference.

The College has an open safeguarding ethos regularly addressing safeguarding responsibilities during staff meetings and fostering an ongoing culture of vigilance. All new staff and volunteers receive a safeguarding induction and are briefed on the code of conduct for adults working with students. On every interview panel for college staff at least one member (teacher, manager or governor) will have undertaken safer recruitment training either online through the DfE website or by attending local authority training.

Safe College, Safe Staff

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

The College will ensure that all adults, whether members of staff, volunteers or involved in the transportation of students will be subject to the appropriate level of vetting procedures.

The College will follow guidance from the Safeguarding Partnership arrangements for Hillingdon, with regard to allegations against staff in cases of suspected inappropriate conduct by staff in respect of students.

All staff should be aware of the potential problems of working with students in a one-to-one situation and should take appropriate preventative action e.g. ensure that the interaction takes place with the door open in a highly visible area and with another adult teacher or Teaching and Learning Associate present.

All new members of staff have child protection training as part of their induction in order to avoid situations where allegations may be made against them. Individual students seeking advice from teachers on sexual matters should be referred to the visiting nurse. Staff should not give individual advice to students about such matters. Sex and relationships are taught through the curriculum and students are able to ask questions as appropriate. The Designated Safeguarding Lead and Lead Safeguarding Officer receives up to date training at least every two years. Designated members of the Senior Leadership Team and Governors have received the Safer Recruitment training.

Allegations against staff will be reported to the Executive Principal in the first instance and will then be referred to the Local Authority Designated Officer (LADO) to decide on a course of action.

Allegations of abuse made against teachers, and other staff, including supply teachers and volunteers.

If staff, supply staff, visitors or volunteers are working with students alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in college, who they are with and for how long. Doors, ideally, should have a clear glass panel in them and must be left open. Sometimes allegations are made against adults who come into contact with students. We all have a responsibility to ensure that the requirements of this policy are fully adhered to.

Where the College or college are not the employer of an individual they still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties (this includes supply teachers and volunteers).

There are sensible steps that every adult should take in their daily professional conduct with students. If a member of staff has information which suggests an adult who works with students (in a paid or unpaid capacity) has:

- Behaved in a way that has harmed a student, or may have harmed a student, and/or
- Possibly committed a criminal offence against or related to a student, and/or
- Behaved towards a student or students in a way that indicates he or she may pose a risk of harm to students, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of college

he/she should speak immediately with designated Child Protection Officer or the Executive Principal, who have responsibility for managing allegations. In their capacity they will consult with and/or make a referral to the Local Authority Designated Officer (LADO).

All adults who come into contact with children will be made aware of the steps that will be taken if an allegation is made. The College adheres to the guidance stipulated in the Safeguarding Partnership arrangements for Hillingdon and will seek appropriate advice from this board on general policy issues. For specific concerns, the LADO will be consulted.

If an allegation were made against the Principal, this will be reported to the Chair of the College's Local Advisory Board who will liaise with the LADO.

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in

Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the College
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of students.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the College may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with students
- Having favourites
- Taking photographs of students on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

Searching a Student With and Without Consent

Any search of a student where physical contact is necessary will be carried out in accordance with the statutory government guidance, 'Searching, Screening and Confiscation'. This was published in January 2018 and is used in conjunction with article 8 of the European Convention on Human Rights and the Education Act 1966.

The use of Photographic Images of Students in College

There will be occasions when we would wish to take photographic images of students celebrating achievement as part of the curriculum and during extracurricular activities. This can enhance self-esteem and is therefore welcomed. However, in addition, individuals have the right to privacy and family life and there will be families who do not wish information to be made public. We must also be mindful of confidentiality issues especially in relation to children living in care or with adoptive families and in situations involving child protection and domestic abuse.

As a general rule, where it is appropriate to use images of a child the College will:

- Obtain the active consent of the student, parents, guardians or carers.
- Be able to justify the production of such images.
- Specify how the material will be used.
- Ensure that names are not printed with photographs, which could identify individuals without parental consent.
- Ensure visits by the media are planned in advance and a senior member of staff is aware that images are being taken and for what purpose.
- Avoid making images in one-to-one situations.
- Ensure that all images are available for scrutiny in order to screen for acceptability.
- Make arrangements for storage and disposal of all materials including any unused images.
- Alert parents, guardians or carers of students that any photographs or video film taken at college events are likely to contain images of students who will not have given their permission to be filmed or photographed. Such images should not be circulated more widely than the family. (A note to this effect will be printed on event programmes or tickets).

CONSENT WILL BE REQUESTED WHEN A STUDENT JOINS THE COLLEGE AND, UNLESS WITHDRAWN, WILL REMAIN IN FORCE UNTIL THE STUDENT LEAVES.

Safeguarding: Personal use of Social Media

Staff, students and parents MUST NOT have any personal contact through social media, i.e. Facebook and Twitter. Staff must inform the Designated Safeguarding Lead if they are approached to befriend a student or parent in this way, so that it can be recorded. If students and members of the wider college community wish to communicate with staff they should only do so through official college sites created for this purpose. This is to safeguard staff, student, parents and the wider college community.

5. MONITORING AND REVIEW

Well-managed records are essential to good child protection practice. All staff are clear about the need to record and report concerns about a student or students within each college. The designated Safeguarding and Child Protection Officer is responsible for such records and for deciding at what point these records should be passed over to other agencies. Child Protection records are held separately from a student's college file and in secure storage. All college policies and procedures relating to safeguarding children will be reviewed annually.

6. ROLES AND RESPONSIBILITIES

All adults working with or on behalf of children have a responsibility to safeguard and promote the welfare of children. There are, however, key people within each college who have specific responsibilities. The Lead Safeguarding Officer is the designated person for all child protection matters across the Trust. In addition, the Principal, Executive Principal and other senior members of staff are designated staff for child protection and receive the appropriate training.

The role of the Lead Safeguarding Officer includes:

- Referring cases of suspected abuse or allegations to the relevant investigating agencies.
- Act as a source of support, advice and expertise within a college when deciding whether to make a referral by liaising with relevant agencies.
- Liaise with the Principal of the College concerned to inform him/her of any issues and ongoing investigations and ensure there is always cover for this role.
- Attends regular and appropriate child protection training.
- Recognises how to identify signs of abuse and when it is appropriate to make a referral.
- Ensures a working knowledge of how LSCB's operate, the conduct of a child protection case conference, and be able to attend and contribute to these effectively when required to do so.
- Ensures each member of staff has access to and understand the child protection policy, in particular new or part-time staff who may work with different educational establishments.
- Ensures all staff have induction training covering child protection and are able to recognise and report any concerns immediately they arise.
- Will keep detailed, accurate and secure written records of referrals/concerns.
- Obtain access to resources and attend any relevant or refresher training courses at least every two years.
- Ensures the Trust's child protection policy is implemented and embedded in each college.
- Ensures the Trust's child protection policy is updated and reviewed annually and works with the Academy Board regarding this.
- Ensures parents, guardians and carers see copies of the child protection policy which alerts them to the fact that referrals may be made and the role of each college in this process to avoid conflict later.
- Where students leave a college, ensure their child protection file is copied for the new establishment as soon as possible, but transferred separately from main student file.

The Designated Safeguarding Lead will:

- Take the lead in ensuring Safeguarding and Child protection has a high profile within the College.
- Take overall responsibility for ensuring the College conforms to all statutory requirements in respect of child protection but operationally will delegate coordinating responsibility to the designated Safeguarding and Child Protection Officer, as necessary.
- Be available to support individual teaching and support staff who may have concerns about child protection.
- Ensure the policies and procedures adopted by the Academy Board are fully implemented and followed by all staff.
- Ensure sufficient resource and time are allocated to enable the designated Safeguarding and Child Protection Officer and other staff to discharge their responsibilities.
- Take part in strategy discussions and other inter-agency meetings and contribute to the assessment of children as and when required.
- Ensure that all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner.

The Academy Board is accountable for ensuring that:

- The Trust has effective policies and procedures in place and monitors each college's compliance with them.
- There is an individual member of the Local Advisory Board of each college to champion child protection issues within the College, liaise with the Principal about them, and provide information and reports to the Academy Board. However, it is not usually appropriate for that person to take the lead in dealing with allegations of abuse made against the Principal or Executive Principal. That is more properly the role of the Chair of the Academy Board or, in the absence of a Chair, the Vice Chair.
- All members of the Academy Board and Local Advisory Boards undertake training about child protection to ensure they have the knowledge and information needed to perform their functions and understand their responsibilities.
- In addition to basic child protection training, the Lead Designated Safeguarding Officer undertakes training in inter-agency working that is provided by, or to standards agreed by, the LSCB, and refresher training at two yearly intervals, to keep his/her knowledge and skills up to date and provides advice and support to other staff.
- The Principal, and all other staff who work with children, undertake appropriate training which is kept up to date by refresher training at annual intervals.
- Temporary staff and volunteers who work with children are made aware of the appropriate college's arrangements for child protection and their responsibilities.

All College Staff are expected:

- To attend regular whole college safeguarding and child protection training as and when relevant.
- To raise any safeguarding, child protection concerns with the Designated Safeguarding Lead, Lead Safeguarding Officer, Principal or other designated child protection staff as soon as possible

The Local Authority should:

- Liaise with the College following a referral.
- Support the family and college through any child protection referral.
- Provide effective communication to families and the College.

Parents are expected:

- To ensure their child receives the best care and welfare.
- To inform the College if a situation arises that may affect their child's welfare.
- To co-operate and participate in interventions and support offered by the College.
- To work in partnership with external agencies identified for focus support.

7. LINKS TO OTHER POLICIES AND DOCUMENTS

- Attendance Policy
- Anti-Bullying Policy
- Behaviour for Learning Policy and Procedure
- E Safety Policy
- Health and Safety (including site security) Policy
- Prevent Strategy
- Relationship and Sex Education Policy
- Special Educational Needs and Disability Policy

Policy last updated: August 2021

Date	Change(s) Made	Change Author
TBA	Policy created	Louise Ventin , TRHAT Child Protection Officer
February 2018	Policy text updated and edited for consistency in format. Added statement on Page 11 with regard to DfE Statutory Guidance Searching, Screening and Confiscation January 2018.	Jane Thomas , Senior Officer - Marketing and Media (TRHAT)
March 2018	Whole Policy update in accordance with statutory guidance, regulation and legislation.	Hamdi Ali , TRHAT Lead Safeguarding Officer Debbie Smith , TRHAT Director of Early Years, Children and Family Services Sarah Driscoll , TRHAT Chief Operating Officer
May 2018	Final edit and approval	Sarah Driscoll , TRHAT Chief Operating Officer
September 2018		Hamdi Ali , TRHAT Lead Safeguarding Officer Debbie Smith , TRHAT Director of Early Years, Children and Family Services Sarah Driscoll , TRHAT Chief Operating Officer
September 2019		Hamdi Ali , TRHAT Lead Safeguarding Officer Debbie Smith , TRHAT Chief Officer
April 2020		Carla Jorsling-Thomas , TRHAT Lead Safeguarding Officer Debbie Smith , TRHAT Chief Officer
September 2020		Carla Jorsling-Thomas , TRHAT Lead Safeguarding Officer Debbie Smith , TRHAT Chief Officer
August 2021	Whole Policy update in accordance with statutory guidance, regulation and legislation.	Carla Jorsling-Thomas , TRHAT Lead Safeguarding Officer Debbie Smith , TRHAT Chief Officer

Renewal Date: August 2022		

Annex 1



COVID-19 college closure arrangements for Safeguarding and Child Protection at The Rosedale Hewens Academy Trust

Date: 17.03.2020

Updated: 14.08.2020

Date shared with staff: 04.09.2020

1. Context

From 20th March 2020 parents were asked to keep their children at home, wherever possible, and for colleges to remain open only for those children of workers critical to the COVID-19 response - who absolutely need to attend.

COVID-19 Keeping Children Safe in Education (KCSIE) remains in force throughout the response to coronavirus (COVID-19). The department has issued non-statutory interim guidance on safeguarding in schools, colleges and other providers during the coronavirus outbreak. This guidance supports governing bodies, proprietors, senior leadership teams and designated safeguarding leads to continue to have appropriate regard to KCSIE and keep their children safe.

Colleges and all childcare providers were asked to provide care for a limited number of children - children who are vulnerable, and children whose parents are critical to the COVID-19 response and cannot be safely cared for at home.

This addendum of The Rosedale Hewens Academy Trust Safeguarding, and Child Protection policy contains details of our individual safeguarding arrangements in the following areas:

1. Context
3. Vulnerable children
4. Attendance monitoring
5. Designated Safeguarding Lead
6. Reporting a concern
7. Safeguarding Training and induction
8. Safer recruitment/volunteers and movement of staff
9. Online safety in schools and colleges
10. Children and online safety away from school and college
11. Supporting children not in college
12. Supporting children in college
13. Peer on Peer Abuse
14. Domestic Abuse
15. Support from the Multi-Academy Trust

Key contacts

Role	Name	Contact Number	Email
Designated Safeguarding Lead	MR PETER DENIS, PRINCIPAL	020 8573 1039	pdenis@trhat.org
Deputy Safeguarding Lead	MR MATT REEVES, VICE PRINCIPAL	020 8573 1039	mreeves@trhat.org

Lead Safeguarding Officer	CARLA JORSLING-THOMAS	07951 156684	Cjorsling-thomas@trhat.org
Safeguarding Governor/Trustee	DEBBIE SMITH	07508 429009	dsmith@trhat.org

Vulnerable children

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with education, health and care (EHC) plans. Those who have a social worker include children who have a Child Protection Plan and those who are looked after by the Local Authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

Those with an EHC plan will be risk-assessed in consultation with the Local Authority and parents, to decide whether they need to continue to be offered a school or college place in order to meet their needs, or whether they can safely have their needs met at home. This could include, if necessary, carers, therapists or clinicians visiting the home to provide any essential services. Many children and young people with EHC plans can safely remain at home.

Eligibility for free school meals in and of itself should not be the determining factor in assessing vulnerability.

Senior leaders, especially the Designated Safeguarding Lead (and Deputy) know who our most vulnerable children are. They have the flexibility to offer a place to those on the edge of receiving children's social care support.

The Rosedale Hewens Academy Trust will continue to work with and support children's social workers to help protect vulnerable children. This includes working with and supporting children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children.

There is an expectation that vulnerable children who have a social worker will attend an education setting, so long as they do not have underlying health conditions that put them at risk. In circumstances where a parent does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and The Rosedale Hewens Academy Trust Lead Safeguarding Officer will explore the reasons for this directly with the parent.

Where parents are concerned about the risk of the child contracting COVID19, The Rosedale Hewens Academy Trust Lead Safeguarding Officer or the social worker will talk through these anxieties with the parent/carer following the advice set out by Public Health England.

The Rosedale Hewens Academy Trust will encourage our vulnerable children and young people to attend school, including remotely if needed.

Attendance monitoring

Local authorities and education settings do not need to complete their usual day-today attendance processes to follow up on non-attendance.

The Rosedale Hewens Academy Trust and social workers will agree with parents/carers whether children in need should be attending college – The Rosedale Hewens Academy Trust will then follow up on any student

that they were expecting to attend, who does not. The Rosedale Hewens Academy Trust will also follow up with any parent or carer who has arranged care for their child(ren) and the child(ren) subsequently do not attend.

To support the above, The Rosedale Hewens Academy Trust will, when communicating with parents/carers may confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available.

In all circumstances where a vulnerable child does not take up their place at school, or discontinues, The Rosedale Hewens Academy Trust will notify their social worker.

Designated Safeguarding Lead

The Rosedale Hewens Academy Trust has a Lead Safeguarding Officer and a DSL at each academy college.

The optimal scenario is to have a trained DSL (or deputy) available on site. Where this is not the case the Lead Safeguarding Officer will be available to be contacted via phone or online video - for example when working from home.

Where a trained DSL (or deputy) is not on site, in addition to the above, a senior leader will assume responsibility for co-ordinating safeguarding on site.

This might include updating and managing access to child protection files and concerns liaising with the offsite DSL (or deputy) and as required liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the school or college.

It is important that all The Rosedale Hewens Academy Trust staff and volunteers have access to a trained DSL (or deputy). On each day staff on site will be made aware of that person is and how to speak to them.

The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely.

Reporting a concern

Where staff have a concern about a child, they should continue to follow the process outlined in the College Safeguarding and Child Protection Policy, this includes making a Record of Concern Form which can be done remotely.

In the unlikely event that a member of staff cannot access the system from home, they should email the DSL and the LSO. This will ensure that the concern is received.

Staff are reminded of the need to report any concern immediately and without delay.

Where staff are concerned about an adult working with children in the College, they should report this directly to the DSL and LSO. Concerns around the Principal should be directed to the Chair of Governors: NAME

The Multi-Academy Trust will continue to offer support in the process of managing allegations.

Safeguarding Training and induction

DSL training is very unlikely to take place whilst there remains a threat of the COVID 19 virus.

For the period COVID-19 measures are in place, The Lead Safeguarding Officer, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.

All existing college staff have had safeguarding training and have read part 1 of Keeping Children Safe in Education (2019). The DSL should communicate with staff any new local arrangements, so they know what to do if they are worried about a child.

Where new staff are recruited, or new volunteers enter The Rosedale Hewens Academy Trust they will continue to be provided with a safeguarding induction.

If staff are deployed from another education or children's workforce setting to any of our colleges, we will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that: -

- the individual has been subject to an enhanced DBS and children's barred list check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual

For movement within the Trust, colleges should seek assurance from TRHAT LSO that the member of staff has received appropriate safeguarding training.

Upon arrival, they will be given a copy of the receiving setting's child protection policy, confirmation of local processes and confirmation of LSO and DSL arrangements.

Safer recruitment/volunteers and movement of staff

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, The Rosedale Hewens Academy Trust will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of Keeping Children Safe in Education (2019) (KCSIE).

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

Where The Rosedale Hewens Academy Trust are utilising volunteers, we will continue to follow the checking and risk assessment process as set out in paragraphs 167 to 172 of KCSIE. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

The Rosedale Hewens Academy Trust will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found at paragraph 163 of KCSIE.

The Rosedale Hewens Academy Trust will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE and the TRA's 'Teacher misconduct advice for making a referral.

During the COVID-19 period all referrals should be made by emailing Misconduct.Teacher@education.gov.uk

Whilst acknowledging the challenge of the current National emergency, it is essential from a safeguarding perspective that any college is aware, on any given day, which staff/volunteers will be in the school or college, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, The Rosedale Hewens Academy Trust will continue to keep the single central record (SCR) up to date as outlined in paragraphs 148 to 156 in KCSIE.

Online safety in schools and colleges

We will continue to have appropriate filtering and monitoring systems in place in college.

If IT staff are unavailable, our contingency plan is [insert details of contingency plans for IT support, e.g. from another college, your LA, or your multi-academy trust].

Where staff are interacting with students online, they will continue to follow our existing staff behaviour policy/code of conduct/IT acceptable use policy.

Please refer to the existing policies for further guidance.

Staff will continue to be alert to signs that a child may be at risk of harm online, and act on any concerns immediately, following our reporting procedures.

We will make sure students know how to report any concerns they have back to our college, and signpost them to other sources of support too.

We will make sure parents and carers:

- Are aware of the potential risks to children online and the importance of staying safe online
- Know what our college is asking children to do online, including what sites they will be using and who they will be interacting with from our college
- Are aware that they should only use reputable online companies or tutors if they wish to supplement the remote teaching and resources our college provides
- Know where else they can go for support to keep their children safe online

We will do this by continuing regular updates and communication with parents/guardians via our communication platforms – website/email/telephone

- [Internet matters](#) - for support for parents and carers to keep their children safe online
- [South West Grid for Learning](#) - for support for parents and carers to keep their children safe online
- [Net-aware](#) - for support for parents and careers from the NSPCC
- [Parent info](#) - for support for parents and carers to keep their children safe online
- [Thinkuknow](#) - for advice from the National Crime Agency to stay safe online
- [UK Safer Internet Centre](#) - advice for parents and carers
- Free additional support for staff in responding to online safety issues can be accessed from the [Professionals Online Safety Helpline](#) at the UK Safer Internet Centre.

Children and online safety away from school and college

It is important that all staff who interact with students, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Safeguarding and Child Protection Policy and where appropriate referrals should still be made to children's social care and as required, the police.

Online teaching should follow the same principles as set out in TRHAT code of Conduct.

The Rosedale Hewens Academy Trust will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Below are some things to consider when delivering virtual lessons, especially where webcams are involved:

- No 1:1s, groups only
- Staff and children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be blurred.
- The live class should be recorded so that if any issues were to arise, the video can be reviewed.
- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day.
- Language must be professional and appropriate, including any family members in the background.
- Staff must only use platforms provided by The Rosedale Hewens Academy Trust to communicate with students

- Staff should record, the length, time, date and attendance of any sessions held.

Supporting students not in college

The Rosedale Hewens Academy Trust is committed to ensuring the safety and wellbeing of all its students.

Where the LSO/DSL has identified a child to be on the edge of social care support, or who would normally receive pastoral-type support in college, they should ensure that a robust communication plan is in place for that child or young person.

Details of this plan must be recorded, as should a record of contact have made.

The communication plans can include; remote contact, phone contact, door-step visits. Other individualised contact methods should be considered and recorded.

The Rosedale Hewens Academy Trust and its LSO/DSL will work closely with all stakeholders to maximise the effectiveness of any communication plan.

This plan must be reviewed regularly (at least once a fortnight) and where concerns arise, the LSO/DSL will consider any referrals as appropriate.

The College will share safeguarding messages on its via email, website and social media pages.

The Rosedale Hewens Academy Trust recognises that college is a protective factor for children and young people, and the current circumstances, can affect the mental health of students and their parents/carers. Teachers at The Rosedale Hewens Academy Trust need to be aware of this in setting expectations of student' work where they are at home.

The Rosedale Hewens Academy Trust will ensure that where we care for children of critical workers and vulnerable children on site, we ensure appropriate support is in place for them. This will be bespoke to each child and recorded.

Supporting students in college

The Rosedale Hewens Academy Trust is committed to ensuring the safety and wellbeing of all its students. The Rosedale Hewens Academy Trust will continue to be a safe space for all children to attend and flourish. The Principal will ensure that appropriate staff are on site and staff to student ratio numbers are appropriate, to maximise safety.

The Rosedale Hewens Academy Trust will refer to the Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID19.

The Rosedale Hewens Academy Trust will ensure that where we care for children of critical workers and vulnerable children on site, we ensure appropriate support is in place for them. This will be bespoke to each child and recorded.

Where The Rosedale Hewens Academy Trust has concerns about the impact of staff absence – such as our Lead Safeguarding Officer/Designated Safeguarding Lead or first aiders – will discuss them immediately with the trust.

Peer on Peer Abuse

The Rosedale Hewens Academy Trust recognises that during the closure a revised process may be required for managing any report of such abuse and supporting victims.

Where a college receives a report of peer on peer abuse, they will follow the principles as set out in part 5 of KCSIE and of those outlined within of the Safeguarding and Child Protection Policy.

The college will listen and work with the young person, parents/carers and any multiagency partner required to ensure the safety and security of that young person.

Concerns and actions must be recorded and appropriate referrals made.

Domestic Abuse

Data shows that Incidences of Domestic Abuse have significantly increased during the period of isolation as perpetrators will use this time as a “tool of coercive and controlling behaviour”, and victims and their children are consistently more vulnerable during periods of societal stress see government guidance. We will be alert to disclosures and indicators from children that they have been exposed to this and will follow up on any concerns.

Operation Encompass will continue as normal with notifications being sent to the college’s Lead Safeguarding Officer. Colleges will seek advice from the Hillingdon Domestic abuse lead Stella Anaxagorou where needed.

Support from The Rosedale Hewens Academy Trust

The TRHAT Central Safeguarding Team will provide support and guidance as appropriate to enable the LSO/DSL to carry out their role effectively.

This includes, remotely accessing Child Protection files for the purpose of quality assurance, support, guidance and direction.

TRHAT will also provide regular group and individual supervision sessions. This may take the form of an online meeting.