

The ArtsXchange

Part of the T4 Trust

Child Protection and Safeguarding Policy

Version Control:

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Virtual School Head for Care Experienced Children & Young People Islington: Matthew Blood

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Email: matthew.blood@islington.gov.uk

Islington Children Social Care: Multi Agency Safeguarding Hub

Contact details: 020 7527 7400

Email: csctreferrals@islington.gov.uk

Police Referrals: Child Abuse investigation Team (CAIT)

Contact Details: 020 8733 6495 or 020 8733 6500

For emergencies: Call 999

Operation Encompass: Supporting child who are experiencing Domestic Violence

Contact Details: 0204 513 9990

Email: info@operationencompass.org

Prevent: Referrals

Educational Prevent Lead

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1. Aims

The college aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2023) 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.

"The Children and Social Work Act 2017 introduced significant changes to the safeguarding landscape in England, including the replacement of Local Safeguarding Children Boards with new local safeguarding partnerships led by three safeguarding partners – the Local Authority, "Integrated Care Systems" which replaced the Clinical Commissioning Group on 1st July 2022 and Police.

For the purposes of this guidance, safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

We follow Islington's Local Authority safeguarding procedure, in addition to the Pan-London Threshold due to a number of our students residing in several different localities across London and the south east.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- 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 pupils at the school
- [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
- [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
- UKCIS Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People (December 2020)
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges: Advice for Schools and Colleges on how to prevent and respond to reports of sexual violence and harassment between children (Updated September 2021)
- The Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
-

Education and Training (Welfare of Children) Act 2021 (16-19 Academies and Independent Training Providers)

- The Equality Act 2010
- The Safeguarding Vulnerable Groups Act 2006
- What to do if you're worried a child is being abused 2015
- The Equality Act 2010 and schools: Department advice for school leaders, school staff, governing bodies and local authorities (May 2014) ➤ The Teacher Standards 2012

This policy also complies with our funding agreement and articles of association.

3. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs or disabilities (SEND).
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Have English as an additional language.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalization.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after or previously looked after.

4. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the college and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended college and off-site activities.

4.1 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conducts, the role and identity of the Designated Safeguarding Lead (DSL), the behaviour policy, and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with a DSL, and sharing information with other professionals to support early identification and assessment by requesting services from Bright Start 5-19.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalization.

4.2 The Designated Safeguarding Lead (DSL)

The role of the Designated Safeguarding Lead's are to take lead responsibility for safeguarding and child protection within the college and to be available during school hours for staff to discuss safeguarding concerns. Any reference to a DSL refers to all DSL trained staff within the ArtsXchange College.

DSL's will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (Local Authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

DSL's (which includes Deputy) will:

- Liaise with and manage referrals to relevant agencies such as CSCT, the LADO, the Channel Panel, the Police and the Disclosure and Barring Service (DBS);
- Keep the principal and the board of governors informed of on-going safeguarding and child protection issues and enquiries;
- Provide advice and guidance for staff on safeguarding and child protection issues and making referrals and liaise with the Head of College regarding referrals
- Ensure the college's safeguarding and child protection policies are up to date and consistent with Islington's Safeguarding Children Partnership policies and that policies are reviewed annually;
- Ensure all staff, including temporary staff, are aware of and understand policies and procedures and are able to implement them;
- Attend regular training, including Prevent awareness training, and the designated teacher's meetings hosted by Islington in order to keep up to date with new policy, emerging issues and local early help, safeguarding and child protection procedures and working practices;
- Provide regular updates received from Islington to all staff members and governors on any changes in safeguarding or child protection legislation (updated information will be provided by Islington at the designated teachers meeting and safeguarding trainers via 6 weekly bulletins; DSL and Deputy's will be responsible for communicating this information to staff immediately; they may decide to hold workshops or discuss in staff meetings);
- Have an awareness of those children who may be in need, young carers and children who have special educational needs and liaise with the SENCO when considering any safeguarding action for a child with special needs;
- Liaise with the Designated Teacher for LAC whenever there are safeguarding concerns relating to a looked after child or previously looked after child;
- Liaise with the Virtual School Head and work alongside them to ensure the appropriate support is in place
- Oversee child protection systems within the college, including the management of records, standards of recording concerns and referral processes;
- Provide a link between the college and other agencies, particularly CSCT and the Islington Safeguarding Children Partnership;
- Ensure staff, including temporary staff, receive appropriate safeguarding and child protection training every 2 years;
- Ensure parents/carers are fully aware of the college policies and procedures and that they are kept informed and involved;

- Ensure relevant records are passed on appropriately when children transfer to other schools/colleges and where appropriate, share relevant information with schools or colleges to enable continued support the child on transfer.

4.3 The Governing Board

The governing body will ensure that the college meets its statutory duties with regard to safeguarding and protecting pupils and that the following are in place:

- All governors will read the most recent Keeping Children Safe in Education (KCSIE) document.
- The college has policies in place to protect children and young people and that these are regularly monitored, reviewed and updated where necessary;
- Safeguarding policies and procedures covering early help and child protection that are consistent with Islington Safeguarding Children Partnership procedures and Islington's internal policies
- A staff code of conduct policy including policies covering staff/student relationships and communications and staff use of social media
- A procedure for responding to incidents where children go missing from education, particularly where there are repeated incidents that suggest potential safeguarding risks may be present.
- The college is able to work jointly with other agencies in order to ensure students can access help and support from early help services and statutory social work services and that children's plans are implemented and monitored.
- There is a nominated governor with responsibility for liaising with Islington CSF on safeguarding and child protection matters and who links with the LADO in the event of an allegation against the Head of College.
- The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the principal, where appropriate (see appendix 3).
- A senior member of staff is appointed as a DSL with responsibility for carrying out the statutory duties as set out in this policy, the individual is given sufficient time and resources to carry out their responsibilities and that another member of staff is appointed to deputise in their absence.
- There is a designated teacher nominated to promote the educational achievement of looked after children and previously looked after children and that this person has received appropriate training for the role.
- Staff receive a thorough induction on joining and are given copies of all relevant safeguarding and child protection policies and the staff code of conduct policy.
- Staff are confident that they can raise issues with leaders where there are concerns about safeguarding practice at the college and there are robust whistle blowing procedures in place.
- Steps are taken to ensure parents and students are aware of the college's safeguarding and child protection policies and procedures.
- Governors take steps to ensure children are given opportunities within the curriculum to learn how to keep themselves safe, including on-line.
- The college has appropriate written procedures in place to ensure safer recruitment practices and reasonable checks on visitors to the college, to deal with allegations against staff or volunteers and to report matters to the Disclosure and Barring Service as required, and that these policies are consistent with statutory guidance and reviewed on an annual basis.
- At least one member of the governing body has undertaken accredited safer recruitment training.
- All staff receive safeguarding and child protection training at least every 2 years and receive regular updates from a DSL to ensure they remain up to date with new legislation.
- The college has procedures in place to deal with allegations made against other students.
- Children's wishes and feelings are taken into account when deciding on what action to take or decisions about services to protect individual children and there is a robust system in place for gaining feedback from students.

4.4 The Head of College

The Head of College will ensure that the college meets its statutory safeguarding duty by ensuring the following:

- Staff are inducted thoroughly and have read all the colleges' safeguarding and child protection policies, behaviour policies and the CSCP children missing from education policy so that they are fully aware of their role in safeguarding children and are able to fully implement policies.
- All staff are able to identify those children who need extra help and can make appropriate referrals to early help services.
- All staff are vigilant to harm and abuse, are able to identify those children for whom there are child protection concerns and can make appropriate referrals to CSCT.
- Staff are able to work in partnership with other agencies to safeguard children, including providing early help support, contributing to assessments and the implementation of the child's plan, attending network meetings and case conferences, monitoring children's progress and liaising with social workers.
- Ensuring that a DSL has appropriate time, funding, training and resources, and that there is always adequate cover a DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Safer recruitment practice is followed when recruiting to posts and appropriate action is taken whenever an allegation is made against a member of staff.
- The college offers a safe environment for staff and students to learn.
- Communicating this policy to parents when their child joins the college and via the college website
- Safeguarding issues are brought to the attention of the governing body.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

4.5 The Role of the Special Educational Needs Co-ordinator SENCo

A SENCo is responsible for the day-to-day operation of the school's [SEN](#) policy. The SENCo will co-ordinate additional support for pupils with SEN and liaise with their parents, teachers and other professionals who are involved with them. All mainstream schools must appoint a teacher to be their SENCo. The type of responsibilities a SENCo has are:

- Overseeing the day-to-day operation of the school's SEN policy
- Supporting the identification of children with special educational needs.
- Co-ordinating provision and interventions for children with SEN.
- Liaising with parents of children with SEN.
- Liaising with other providers, outside agencies, educational psychologists and external agencies particularly for children receiving support. Ensuring that the school keeps the records of all pupils with SEN up to date.

The [SENCO](#) should have the support of the Head of College and other teachers to try and develop effective ways of overcoming barriers to a child's learning and ensuring that they receive effective teaching through assessing the child's needs and setting targets for improvement. SENCo's must also collaborate with curriculum co-ordinators at the school to make sure that the learning requirements of all children with SEN are given equal emphasis and priority.

If you think there may be something holding a student back, express those concerns. If your child has not been diagnosed as having a special need, but you think things are not progressing as they should, have a meeting with the SENCo. If the needs are likely to be more than a minor concern that can be dealt with by

the class teacher, the SENCo may observe the child, talk to other staff members and look at any records that may indicate a difficulty. This may suggest that the child just needs a little extra help, or that SEN professionals need to become involved to diagnose a graver difficulty, and perhaps initiate an Education, Health and Social Care (EHC) Plan.

The SENCo will then be the person who liaises with you, the teachers and teaching assistants about your child's needs. This isn't a one-way street - ensuring your child receives the full help necessary to fulfil their potential may require diligent homework, detailed searching and questions on your part.

Further support and guidance:

- [Safeguarding disabled children](#)
- [SEND Code of Practice 0-25 years](#)
- [Supporting Pupils at School with Medical Conditions](#)
- [Islington SEND Information and Support Service](#)
- [MENCAP](#)

4.6 Working with parents and carers

The college recognises the importance of working in partnership with parents and carers to ensure the welfare and safety of students.

The college will:

- Make parents aware of the college's statutory role in safeguarding and promoting the welfare of pupils, including the duty to refer students on where necessary, by making all college policies available on the college web-site or on request;
- Provide opportunities for parents and carers to discuss any problems with class teachers and other relevant staff;
- Consult with and involve parents and carers in the development of college policies to ensure their views are taken into account;
- Ensure a robust complaints system is in place to deal with issues raised by parents and carers;
- Provide advice and signpost parents and carers to other services and resources where students need extra support.

5. Safeguarding children

The college will carry out its duty to safeguard students which is:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring children are growing up in circumstances consistent with the provision of safe and effective care
- Undertaking that role so as to enable children to have optimum life chances so they can enter adulthood successfully.
- The college will refer to Islington's thresholds and eligibility criteria (available at the link below) to help make decisions on the child's level of need and the appropriate service to refer on for services. Staff will consult with a DSL for advice and to discuss the case prior to making any referral for services.
- All referrals for a children's social care service will be made by way of a referral to Islington's child and family contact team. The team is Islington's "front door" for children's social care referrals and accepts referrals for all cases.
- Parental consent for referral will be sought but a referral will be made regardless of consent being given in cases where there are safeguarding concerns about the child and making a referral is a proportionate response to those concerns.

- Staff will also share information and work in an integrated way to ensure a coordinated response from agencies to support families and meet the child's needs.

5.1 Early help Support

Staff will identify children who need extra help at an early stage and provide help and support in order to prevent concerns from escalating. In particular, staff will be aware of the needs of the following groups of children whose circumstances may mean they will require early help:

- Children with disabilities and additional needs, including those with special educational needs •
Young carers
- Children showing early signs of being drawn into antisocial or criminal behaviour, including gangs and organised crime;
- Children who frequently go missing from home, school or care;
- Children who are misusing drugs or alcohol;
- Children at risk of exploitation through modern slavery and trafficking;
- Children whose home circumstances are negatively affected by adult substance misuse or mental ill health or domestic abuse;
- Children who have returned home from care;
- Children who show early signs of abuse or neglect; • Children at risk of radicalisation;
- Privately fostered children.

Where the child's extra needs require services, consideration will be given to what early help support can be offered to a child by the college.

If the child requires an early help service from another agency, the college will make a referral to the early help service (via the child and family contact team) for appropriate help and support. Staff will consult with parents prior to making any referral to discuss the matter and gain consent to refer the child. Where the child is receiving an early help service, the college will work as part of the team around the family and take up the role of lead professional where this is appropriate.

Early help provision should be monitored and reviewed to ensure outcomes for the child are improving. If the college believes that this is not the case, consideration should be given making a referral for a statutory social work service.

5.2 Referral for a statutory social care service

Where there are concerns about a child's welfare, staff will act immediately by seeking the advice of a DSL who are most likely to have the most complete safeguarding overview. Following consultation, the DSL will liaise with the Welfare Lead and Head of College to decide on whether to make a referral to CSCT via the Contact Service.

Where the referral raises concerns that the child is at risk of significant harm, the case will be passed on to Islington's MASH team to gather relevant information from other agencies.

The Contact Service will inform the college within 1 working day of the outcome of any referral and what action CSCT will be taking. This may include any of the following:

Undertaking S47 Enquiries, convening Strategy Meeting under child protection procedures for any child where there are concerns about significant harm and/or taking any immediate action in order to protect the child.

Carrying out a child and family assessment to identify the child's needs and establish if the child is a Child in Need under section 17 of the Children Act 1989. These are children (including disabled children) who are unlikely to meet a reasonable standard of health and development unless provided with services. Providing services for the child and their family in the meantime whilst work is on-going (including details of services).

6. Child Protection Procedures

6.1 Role of the college

The college will work to the following policy documents in order to support the protection of pupils who are at risk of significant harm:

- Working together to safeguard children (*DfE 2018*)
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- What to do if you're worried a child is being abused (*DfE2015*)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf
- The London Safeguarding Children Board child protection procedures
<https://www.londonsafeguardingchildrenprocedures.co.uk/>
- Keeping Children Safe in Education (KCSiE, *DfE 2023*)
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2> In line with these policies and procedures, the college will:
 - Identify those students where there are child protection concerns and make a referral to CSCT
 - Attend child protection case conferences in order to effectively share information about risk and harm
 - Contribute to the development and monitoring of child protection plans as a member of the core group
 - Carry out the college's role in implementing the child protection plan and continually monitoring the child's wellbeing, and liaising with the allocated social worker as required.

6.2 Recognition

Staff have a responsibility to identify those children who are suffering from abuse or neglect and to ensure that any concerns about the welfare of a pupil are reported to a DSL.

Staff should refer to appendix 1 for a full definition of significant harm and the specific indicators that may suggest a student may be at risk of suffering significant harm.

Any concerns held by staff should be discussed in the first instance with a DSL and advice sought on what action should be taken. Where required, advice on thresholds and indicators of harm can be obtained from the MASH social worker on a no-names basis.

Safeguarding concerns are monitored over time and recorded on the My Concern System by staff evidentially where a chronology of concerns and actions are recorded.

6.3 Managing and supporting disclosures

If a pupil discloses to a member of staff that they are being abused, the member of staff should;

- Listen to what is said without displaying shock or disbelief and accept what the child is saying; • Allow the child to talk freely;
- Reassure the child but not make promises that it may not be possible to keep, or promise confidentiality, as a referral may have to be made to CSCT;
- Reassure the child that what has happened is not their fault and that they were right to tell someone;
- Not ask direct questions but allow the child to tell their story;
- Not criticise the alleged perpetrator;
- Explain what will happen next and who has to be told; • Make a formal record and pass this on to a DSL.

6.4 Referral

Where possible, a decision on whether or not to refer a student to Children's Services (CSSW) should be made by a DSL following a discussion with the member of staff who has raised concerns. However, this

should not delay any referral and any member of staff may make a referral if this is necessary but staff should discuss the matter with a member of the senior management team and take advice from the Child and Family Contact team social worker. A DSL should be informed as soon as possible.

Referrals should be in writing using a referral form completed either by the teacher raising concerns or by a DSL. Urgent child protection referrals will be accepted by telephone but must be confirmed in writing via a referral form within 48 hours.

Where there is any doubt about whether the concerns raised meet the thresholds for a child protection referral, the DSL may discuss the case on a “no names” basis with the Child and Family Contact team social worker to obtain advice on how to proceed. Parental consent should be sought prior to the referral being made but a referral can be made if parents refuse consent where there are safeguarding concerns about the child and referral is a proportionate response to these concerns. Consent should not be sought if this would place the child at risk of further harm, interfere with a criminal investigation or cause undue delay.

If the child already has an allocated CSCT social worker, the referral should be made directly to them. If the child is not already known to CSCT, referrals should be made to the Child and Family Contact team. If the child lives outside Islington, a referral should be made to their home local authority.

All referrals will be acknowledged by the Child and Family Contact team manager within 24 hours and the referrer informed of what action will be taken.

If the college does not think the child’s situation is improving within a reasonable timescale following referral, this should be taken up with CSCT/Early help services via a DSL.

If the DSL’s/Head of College are not on site OR it is ‘out of hours’ staff should feel empowered to make a direct referral to children’s social care and/or the police if you believe a child is suffering or likely to suffer from harm, or in immediate danger. The member of staff however, should discuss this with a DSL/Head of College to ensure that this is the most appropriate action. Tell a DSL or Head of College as soon as possible if you make a referral directly and they will oversee the referral as it will need to officially be done through the LA Islington referral system.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL’s or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child’s situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child’s situation improves.

6.5 Attendance at case conferences and core groups

The DSL’s will liaise with Children’s Social Care (CSC) to ensure that all relevant information held by the college is provided to CSC during the course of any child protection investigation.

The DSL will ensure that the college is represented at child protection case conferences and core group meetings:

- i) Where possible, a member of staff who knows the child best, such as a class teacher or head of year will be nominated to attend,
- ii) Failing that, the DSL or their Deputy will attend,
- iii) If no representative from the college can attend, the DSL will ensure that a report is made available to the conference or meeting.

6.6 Monitoring

Where a student is the subject of a child protection plan and the college has been asked to monitor their attendance and welfare as part of this plan;

- All information will be recorded on the My Concern System where the information of concerns are shared with the professional network to safeguard the young person, contributing to meetings such as Strategy Meetings, Child in Need Meetings, Child Protection Conference and Core Group Meetings
- Monitoring will be carried out by the relevant staff member in conjunction with the DSL's;
- The DSL's will notify the allocated social worker if the child is removed from the school roll, excluded for any period of time or goes missing.

6.7 Confidentiality and information sharing

All information obtained by college staff about a student will be kept confidential and will only be shared with other professionals and agencies with the family's consent unless there are safeguarding concerns that need to be shared with CSC and parents refuse consent or seeking consent would place the child at further risk.

If the child is under 12, consent to share information about them must be obtained from their parents or carers. Young people aged 12 to 15 may give their own consent to information sharing if they have sufficient understanding of the issues. Young people aged 16 and 17 are able to give their own consent if they are thought to have the capacity to do so under the Mental Capacity Act; otherwise, consent should be sought from parents.

Where a child is at risk of suffering significant harm, schools and colleges have a legal duty to share this information with CSCT and make appropriate referrals. Equally, where a child is subject to a child protection investigation, schools and colleges must share any information about the child requested by CSCT.

Parental consent to making a child protection referral should be sought but if withheld, the referral must still be made and parents made aware of this. Before taking this step, schools and colleges should consider the proportionality of disclosure against non-disclosure; is the duty of confidentiality overridden by the need to safeguard the child?

Parental consent to referral can be dispensed with if seeking consent is likely to cause further harm to the child, interfere with a criminal investigation or cause undue delay in taking action to protect the child. However, schools/colleges should discuss this with the Child and Family Contact team social worker on a "no names" basis to gain advice on whether this course of action should be taken.

Only relevant information should be disclosed, and only to those professionals who need to know. Staff should consider the purpose of the disclosure, and remind recipients that the information is confidential and only to be used for the stated purpose.

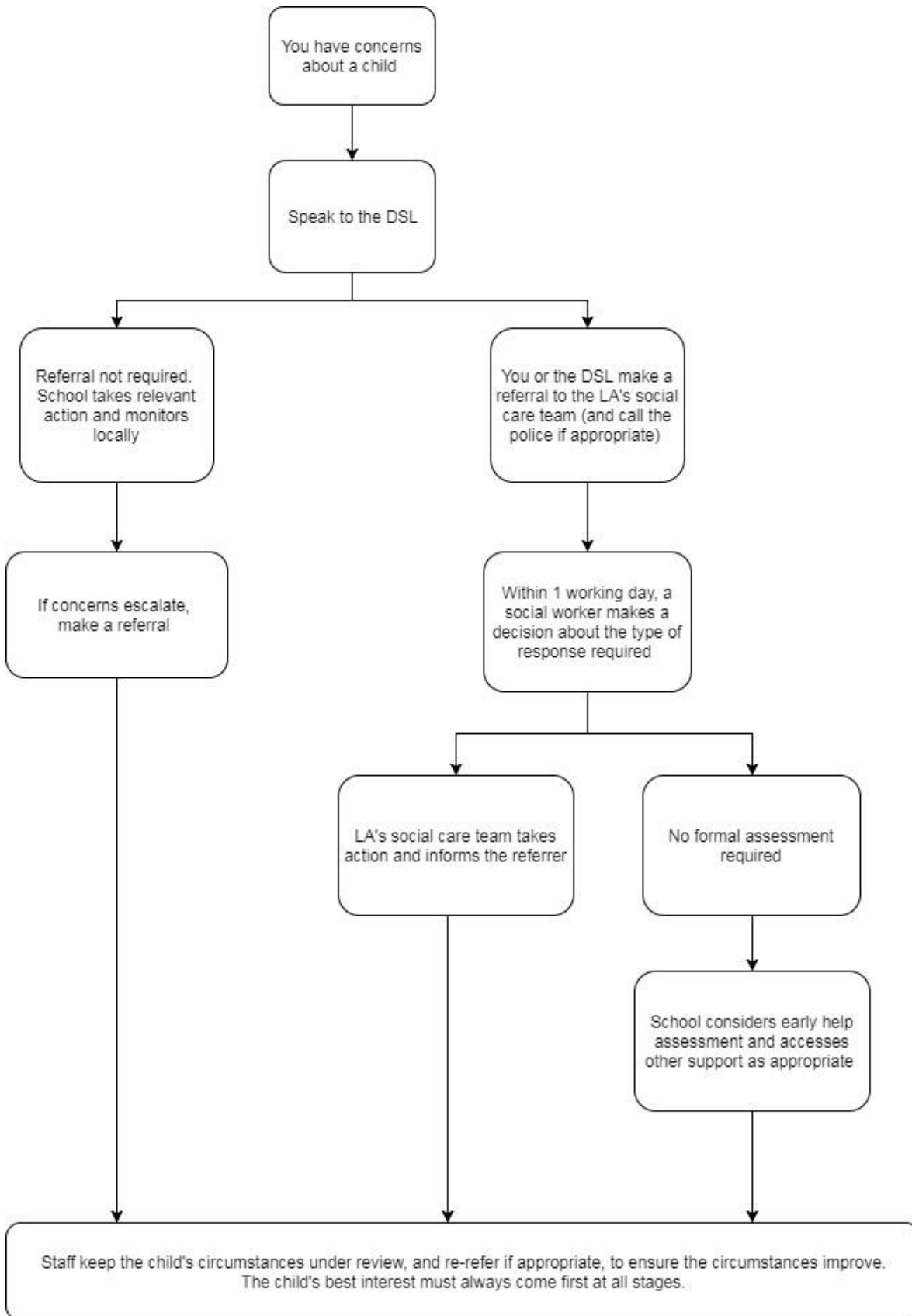
In the event that a child makes a disclosure of neglect or abuse, staff cannot guarantee them confidentiality, but must explain why they have to pass the information on, to whom and what will happen as a result. Parents should also be made aware of the college's duty to share information.

Staff should discuss any concerns or difficulties around confidentiality or information sharing with a DSL or seek advice from the Child and Family Contact team social worker. 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 a DSL. Confidentiality is also addressed in this policy with respect to record-keeping in section 10, and allegations of abuse against staff in appendix 3.

For further information regarding please refer to our Data Protection Policy.



7. Safer recruitment

7.1 General principles

The college recognises safer recruitment practices are an essential part of creating a safe environment for children and will ensure that staff working in the college are suitable to do so and do not pose any kind of risk to children.

The college will follow the Keeping Children Safe in Education guidance (DfE 2023). The college will carry out extensive checks and enquiries on applicants for all positions, including voluntary and support roles and governors and those involved in the management of an independent school, in accordance with statutory requirements. After suggesting in last year's update that schools and colleges perform online searches on potential new employees, this year's update specifies that schools and colleges should "inform shortlisted candidates" that online searches may be carried out in the recruitment process.

No staff member, volunteer, governor or anyone involved in the management of an independent school will be allowed to take up posts until all checks and enquiries required for that position have been satisfactorily completed. Checks with the Disclosure and Barring Service (DBS) will be carried out at the level appropriate to the candidate's role in the school. All job advertisements and application forms will clearly state that the role is a safeguarding role and that applicants will be expected to agree to undergo DBS and other checks as part of safer recruitment practices.

Staff and governors who normally sit on interview panels will be trained in safeguarding interviewing techniques and no interview should go ahead unless at least one member of the panel has undertaken safer recruitment training. The college will take up the accredited safer recruitment training offered through the Islington Safeguarding Children Partnership or any other accredited training provider. Although the Head of College will have day-to-day responsibility for the recruitment of staff, the board of governors will ensure that they maintain an overview of recruitment systems in order to scrutinise practice and ensure all statutory checks are carried out.

The college and/or its Human Resources consultants with responsibility for carrying out recruitment checks should ensure they have a copy of any relevant documents or take relevant issue numbers from documents as proof that the document has been seen. Checks will be taken out on existing staff where concerns arise regarding their suitability to work with children or a person moves into a post that is a regulated activity. In college, the Head of College will be responsible for keeping a single central record of all staff and volunteers who work at the college. In college, the Head of College will be responsible for keeping a single central record of all staff that provides education to children. The single central records should include details of all checks carried out and the outcome of these checks or any certificates obtained in the format shown at appendix 2.

Where the college has salaried trainee teachers, the college will ensure that all necessary checks are carried out on the trainees, including DBS checks, and that the outcome of these checks is recorded on the single central record. For trainee teachers that are fee-funded, the college will obtain written confirmation from the training provider that the necessary checks have been carried out and that the trainee has been judged to be suitable to work with children. Where staff are recruited via third parties such as employment agencies, the Head of College and/or the board of governors will:

- seek written confirmation from the agency that the agency has carried out all necessary checks on the individual
- request written confirmation of the outcome of all checks
- request written confirmation that an enhanced DBS certificate has been received by the agency

- check the identity of agency staff when they first present for work to ensure they are person against whom the checks were taken out.

7.2 Checks undertaken

The college will verify the following information for all new staff:

The applicant's identity must be verified from their passport or other photographic ID and proof of address must be provided.

The applicant's right to work in the UK must be evidenced through documentation. Only original documentation should be accepted and its validity checked in the presence of the applicant. Where the applicant will be involved in regulated activity, an enhanced DBS check will be taken out, including information from the barred list. If the applicant will begin work before an enhanced DBS check can be completed, a barred list check will be obtained.

In the case of teaching staff, checks will be made on the applicant's academic and vocational qualifications and further checks made on TRA Teacher Services system to ensure they are not prohibited from teaching under a teacher prohibition order.

For independent schools, free schools and academies, checks will be made to ensure any member of staff or governor involved in the management of the school is not barred from doing so under a section 128 direction.

Where the applicant has been living abroad, similar enquiries will be made in the country of origin relating to the applicant's qualifications and suitability to teach via the TRA Teacher Services system.

Criminal records checks for overseas applicants - Publications - GOV.UK

Employing overseas-trained teachers from outside the EEA - Publications - GOV.UK

Enquiries will be made regarding the applicant's state of physical and mental health to the extent that it may affect their capacity to carry out their role.

The college will keep copies of the following documents on staff personnel files:

- documents used as proof of identity such as passports or driving licences;
- a summary of the DBS certificate (but all other documents relating to the DBS check Must be destroyed);
- documents that prove the staff member's right to work in the UK (failure to do so can result in a fine for employing illegal workers).

7.3 References

Applicants will be asked to provide a full employment history and details of at least 2 referees, including previous and recent employers, and who should be a senior member of staff with the authority to provide references. References from colleagues will not be acceptable. All references will be taken up prior to interview and will be requested directly from the referee, including references for internal candidates. Referees will be contacted to resolve any issues that emerge from the references provided. References will be taken up from current employers only; if the applicant is not currently employed, verification of will be sought from their previous college as to the dates the applicant was employed and the reasons for leaving the post. Any information provided by applicants as part of an application process will be verified with independent sources and any reference received electronically will be checked to verify the originating source.

7.4 DBS checks

In order to ensure that people who work in the college are suitable to do so and are not barred from working with children, the college will apply to the Disclosure and Barring Service (DBS) for police checks and other barred list information as part of the recruitment process.

Full DBS checks which include barred list checks will only be taken out on individuals who are involved in regulated activity. This is defined as close, unsupervised contact on a regular basis involving activities such as:

- teaching
- training
- supervising,
- care,
- guidance and advice,
- driving a vehicle,
- personal or intimate care.

The activity must be carried out regularly as part of the staff member's day to day responsibilities and the checks will be reasonable in order to safeguard children.

Full DBS checks with barred list checks will also be carried out on permanent staff members working at the college or unpaid volunteers who regularly work unsupervised at the college and whose work means they have an opportunity for regular contact with children.

Other staff, contractors and supervised volunteers who have opportunities for regular contact with children but do not carry out a regulated activity will be subject to an enhanced DBS check but not barred list checks.

Decisions on whether a person is carrying out a regulated activity or whether their role provides opportunities for regular contact with children requiring a DBS check will be made by whoever is responsible for recruitment in the college, for example the Head of College or governor, and the following will be taken into consideration when deciding on this.

- the age of the children;
- their level of vulnerability;
- the numbers of children in the group;
- the nature of the role;
- opportunities for contact with the children.

The college has robust procedures for day-to-day staff management and supervision and clear procedures for reporting and acting on concerns. Staff carrying out roles involving regulated activity will be suitably supervised on a regular basis by senior staff carrying out a similar role.

The college will ensure that all DBS checks carried out on staff are renewed after 3 years of the original DBS disclosure.

7.5 Volunteers

The Head of College will ensure that the following are carried out in relation to unpaid volunteers such as parents who accompany students on school outings or provide help in the classroom:

All volunteers will be required to undergo a recruitment process, such as references, DBS and other checks and interviews that are appropriate and proportional to the duties assigned to them.

Volunteers who are carrying out a regulated activity, for example being left unsupervised with children or providing personal care to children should be subject to an enhanced DBS check, including barred list information.

New volunteers who are not carrying out regulated activity but who have an opportunity for regular contact with children will be subject to an enhanced DBS check but this may not include a barred list check. For other volunteers who are not carrying out regulated activity and do not have regular contact with children, the principal will carry out a risk assessment to decide whether an enhanced DBS check should be carried out depending on:

- the nature of the role
- what information is already known about the volunteer?
- what references from work or volunteering activity the volunteer has provided regarding suitability?
- whether the role is eligible for an enhanced DBS check.

The college will ensure that all volunteers are competent to carry out the duties assigned to them and are only assigned duties that are suitable to their qualification and experience.

Volunteers carrying out regulated activity but for whom a DBS check has not been carried out will be suitably supervised by teaching staff at all times at a level that ensures the safety of students.

All volunteers will be fully inducted in relation to all college policies and procedures.

7.6 Governors and independent college management

The college will take out an enhanced DBS check on governors but a barred list check will only be taken out if the individual governor will be carrying out a regulated activity within the college.

The school will also take out a check with the Teaching Regulation Agency Teacher Services system to establish whether any individual seeking to become the governor of a maintained school/college or take up a position in the management of an independent school/college has been disqualified and therefore unable to do so.

We will record all information on the checks carried out in the college's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

All proprietors, trustees, local governors and members will also have the following checks: A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

7.7 Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

7.8 Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

7.9 Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the college has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity

- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the college.

7.10 Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

7.11 Staff working in alternative provision settings

Where we place a student with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

7.12 Adults who supervise students on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a student under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

7.13 Students staying with host families

Where the college makes arrangements for students to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the college is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner colleges abroad to ensure that similar assurances are undertaken prior to the visit.

7.14 Alternative education provision

Whenever the college places a student with an alternative education provider, the college will obtain written confirmation of the provider's safeguarding and child protection policies and ensure that appropriate safeguarding checks on individuals working at the establishment have been carried out.

8. Staff practice and conduct

8.1 Induction and training

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the college's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

The Head of College will ensure that all staff are fully inducted, are made aware of the following College policies and that staff are fully aware of their role in implementing these:

- Safeguarding and child protection policy and procedures
- Behaviour and Anti-bullying policy
- Staff Code of Conduct
- Children missing from education policy.

Staff and Governors must confirm in writing that they have received and read all relevant staff policies, the KCSiE 2023, including “What to do if you are worried a child is being abused” guidance. Information is stored within personnel files and within the Single Central Record.

The DSL’s will ensure that all staff are fully inducted with regard to the college child protection procedures and that they receive safeguarding and child protection training on a two-yearly basis.

The Head of College will keep a central record of all statutory and other training undertaken by staff members, governors and volunteers.

College staff and governors will receive multi-agency safeguarding training provided by Islington Safeguarding Children Partnership at the relevant level every three years with annual refreshers.

As well as basic safeguarding training, the DSL’s will receive specific training on their role and other relevant multi-agency training courses provided by Islington SCB.

College staff will also receive training on the use of the Common Assessment Framework assessment and referral process as part of their safeguarding training.

College staff will receive regular and timely updates on child protection and safeguarding issues via the DSL in order to ensure they remain up to date with new legislation.

All staff will have training on the government’s anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, ebulletins and staff meetings) as required.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

The DSL’s will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the chair of governors may be required to act as the ‘case manager’ in the event that an allegation of abuse is made against the principal, they receive training in managing allegations for this purpose. At least one person conducting any interview for a post at the college will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education’s statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

All staff that have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

8.2 Conduct and safe teaching practice

The college expects staff and volunteers to set a good example to students through their own conduct and behaviour and aims to protect them from the risk of allegations being made against them by ensuring they maintain high standards of professionalism and appropriate boundaries.

The Head of College will ensure that there is a written code of conduct in place and that each member of staff, including volunteers, signs a code of conduct agreement on appointment that sets out the college expectations with regards to standards of professional behaviour and that all staff receive copies of relevant policies.

Staff and volunteers should be aware of current guidance on safe teaching practice contained in the DCSF “Guidance for safer working practice for adults working with children & young people” (2009). Staff will be expected to follow Islington’s model social media policy for schools in terms of their use of social media, particularly in relation to professional standards and relationships with pupils. All staff and volunteers will sign an acceptable use agreement before being given access to the college computer system. Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.) and should familiarise themselves with advice and professional expectations outlined in the staff code of conduct the staff acceptable use policy and the Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings (2022).

8.3 Behaviour management

Guidance from the Department of Education provides schools with the powers to intervene in a variety of ways in order to manage behaviour within and outside the school. Details of these may be found at:

<https://www.gov.uk/government/publications/behaviour-in-schools--2>

Islington Council’s policy on physical intervention and restraint - Physical intervention and restraint on students should only be used as a last resort, normally when de-escalation strategies have failed, and when there is a clear risk of serious harm to the student or others or serious damage to property.

Decisions on when to use physical intervention is a matter of professional judgment, and any intervention or restraint should be proportionate, reasonable and necessary to the perceived risk and should continue only for as long as the risk remains. Should such an intervention be required the school should record the details, including any injury, and contact the parent/carer on the same day to explain the circumstances involved.

Use of physical intervention and restraint for vulnerable students with learning and other disabilities, autism and mental health difficulties will be carefully monitored as these students are more susceptible to experience physical intervention and restraint due to their circumstances. Department of Education guidance on reducing use of restraint available at: <https://www.gov.uk/government/publications/reducing-the-need-for-restraint-and-restrictive-intervention> Although guidelines by the DfE allow physical restraint, at The Arts Xchange we do not use physical force, we believe this conflicts with the ethos which revolves around mutually respectful relationships. Displays of power would damage these relationships and be at odds with the safe and productive environment we create. This does not mean that staff never physically intervene. There are occasions when it is necessary that staff may block or stand in between students, and guide them away from the area or in exceptional circumstances use the powers in Section 93 Education and Inspectors Act 2006:

Emergency use of reasonable force which occurs in response to unforeseen events in exceptional circumstances:

1. to prevent students from serious risk of hurting/harming themselves or others,
2. from damaging property,
3. from causing disorder.

The use of reasonable force requires professional judgement to be exercised in difficult situations, often requiring split-second decisions in response to unforeseen events or incidents. Such decisions are known as a dynamic risk assessment, which will include a judgement about the capacity of the student at that moment to make a safe choice. Staff training, line management meetings and supervision of practice should support dynamic risk assessments. Unless the situation is urgent, staff should always use deescalation

strategies and techniques, any physical response must be reasonable and proportionate. If reasonable force has been used a verbal report is to be given to the Head of College or a member of the CLT as soon as possible after the event and a written report to be provided by latest, end of the same school day. Parents/carers/significant others must be notified and the incident will be recorded by the member of staff on SIMS.

Please refer to the Behaviour and Anti-Bullying Policy for The Arts Xchange.

8.4 Low Level Concerns

As part of the whole school approach to safeguarding, promoting an open and transparent culture in which all concerns at The Arts Xchange are dealt with promptly and appropriately. As stated within the KCSiE (2023) creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enabling the identification of concerning, problematic or inappropriate behaviour early, minimising the risk of abuse and ensuring that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or 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 LADO. Examples of such behaviour could include, but are not limited to:

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

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

It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of The Arts Xchange from potential false allegations or misunderstandings.

8.5 Allegations against staff

In the event that an allegation is made against a member of staff or volunteer, the college will follow Islington's "Guidance for the management of an allegation against a member of staff".

<https://cscp.org.uk/professionals/schools-and-nurseries-safeguarding-policies/>

The KCSiE 2023 update to the existing section now clarifies that schools should follow their safeguarding policies and procedures, in the event of an allegation regarding an "incident that happened when an individual or an organisation was using their school premises for the purposes of running activities for children." This includes events such as community groups, sports associations, and more.

It also specifies that records should be "retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer."

The board of governors should appoint the Head of College as the college representative for the purposes of the allegations procedures and who will link with the Local Authority Designated Officer (LADO) for all

allegations raised. A further staff member will be identified as their Deputy to act in their absence or if allegations are made against the responsible staff member.

All allegations in relation to staff members will be referred to the Head of College; allegations against the Head of College will be referred to the board of governors. See appendix 3 for more detail.

8.6 Whistleblowing

The college fosters a culture of openness in line with the “Freedom to speak up” review and will put in place strategies and procedures to ensure that staff feel enabled to raise concerns relating to the safeguarding of children or poor practice within the college that may cause a risk to children. The college recognises that there may be circumstances where staff and students feel unable to raise concerns or incidents of malpractice within the college environment as there is reasonable doubt that these would be dealt with adequately.

All staff and volunteers have a legal duty to raise concerns where they feel individuals or colleges are failing to safeguard and promote the welfare of children. Where it is not possible to raise concerns within the college, staff and volunteers may report concerns to the following;

Islington’s lead officers for child protection or safeguarding where there are issues regarding the welfare of a pupil;

The following numbers can be used where there are issues regarding the college’s overall procedures around safeguarding:

- Islington Council’s confidential and independent help-line for protected Disclosure on 0800 734199
- The Ofsted whistle-blowing line on 0300 123 3155
- The NSPCC whistle blowing helpline on 0800 028 0285.

The Head of College is responsible for ensuring that these numbers are advertised on the college premises and made available to staff and students.

9. Health and safety and risk assessments

9.1 Responsibility for health and safety

The governing body and Head of College will ensure that there is a robust health and safety policy in place in order to meet the statutory responsibility for the safety of students and staff within the college environment.

Any health and safety policy adapted by the college will be based on the government guidance (link below) and will seek to balance risk avoidance against providing students with opportunities to take part in activities that help them learn to manage risk themselves.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/279429/DfE_Health_and_Safety_Advice_06_02_14.pdf

The Operations Director for T4 has responsibility for overseeing Health and Safety across the Trust. Day-to-day responsibility is vested in the Head of College.

9.2 Risk assessments

The college will seek to identify and manage risk through the use of risk assessments. These will be carried out:

- On an annual basis for the college environment as a whole;
- For all college trips;
- For students travelling between locations during the college day;
- For all work-based learning or work experience placements;
- When a student who has been excluded for risky or violent behaviour is returning to the college;

- Whenever there are any changes to the college environment or college practices;
- Following any serious incident.

9.3 Working with aggressive and violent parents

Where the collage is working with families who are known to CSCT and there are concerns about the behaviour of parents towards members of college staff, this must be discussed with the Head of College and the DSL's and the information shared with CSCT.

If there are high levels of risk involved in contact with parents, CSCT may convene a risk assessment meeting with the network in order to discuss strategies to reduce risk, and it is vital that schools and colleges are part of this process.

9.4 Site security and visitors

The board of governors is responsible for the security of the college premises and will take steps to ensure it is a safe environment and securely protected against trespass and/or criminal damage.

The Head of College will decide whether or not contractors should be subject to DBS checks before being allowed access to the building, depending on the level of access they are likely to have to pupils. Where the visitor is employed by an organisation where DBS checks are normally required, for example NHS staff, the Head of College will request written confirmation that relevant checks have been carried out for that individual.

All visitors and contractors will be:

- Informed to report to reception on arrival;
- Expected to provide proof of identity;
- Expected to sign in on the college's InVentry system;
- Expected to wear a name-badge or carry some form of identification at all times when on the college premises;
- Suitably supervised by college staff at all times;
- Made aware of the college's health and safety procedures.

The Head of College and the board of governors will ensure that any contract entered into with contractors' sets out clearly the expectations for worker's behaviour and the responsibility of contractors to monitor and ensure compliance with college policies.

Contracted workers will not be allowed to approach or speak to students in any circumstances and must ensure that all equipment and working practices are in line with health and safety standards.

Visiting organisations such as theatre groups who will be performing for or working directly with students will be expected to have adequate child protection procedures in place and must agree with class teachers in advance what level of supervision or contact, they will have regarding students.

9.5 Use of the college premises by other organisations

The college will only allow use of the premises by other organisations outside of college hours for the purposes of providing supplemental education if:

- The T4 articles of trust or other incorporating document allows this;
- The organisation provides an overview of what it intends to teach so that the board Of governors is able to make a judgment on whether this is in line with The promotion of British values;
- The organisation can provide evidence that they have followed safer recruitment Practices and that their staff have the requisite DBS checks;

The following reasonable and due diligence checks are taken out on the organisation by the college;

- An internet search on the organisation

- Checks with Islington’s Community Groups and Schools Consultant (020 7974 7319),
- Checks with Islington’s Channel officer (020 7974 6050),
- Checks with Islington Community Safety and the local police (020 7974 2915),
- Details of the agreement are recorded on the partnership agreement record.

9.6 Monitoring and review

To enable the college to monitor the safety of the premises and the college environment, as well as the implementation of policies, the Head of College and the Board of Governors will ensure that;

- All college policies are regularly monitored by the Welfare Lead and annually reviewed by the Head of College and Governing body.
- The college keeps a central record of all accidents and incidents including what action was taken and by whom.
- Staff are aware of their responsibility to record accidents and incidents.
- The Head of College has an overview all accidents/incidents.
- Serious accidents and incidents are reported to the board of governors.
- The Welfare Lead ensures a high standard of recording of all concerns held about children. All accidents and incidents are scrutinised on a regular basis by the Board of Governors to identify any problems or weaknesses around the college’s safeguarding policies and procedures or any emerging patterns, with advice and support from the Executive Headteacher, the Operational Safeguarding T4 Trust Lead, any Governor/Trustee with responsibility for safeguarding and the Welfare Lead.

This policy will be reviewed annually, or more frequently if national or local guidance changes.

10. Record-keeping

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. Where staff have a concern about a student they must record their concerns on the My Concern System which is a secured online platform for all concerns of a safeguarding nature.

If you are in any doubt about whether to record something, discuss it with a DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the college.

If a child for whom the college has, or has had, safeguarding concerns moves to another college, a DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, a DSL will speak to a DSL of the receiving college and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

We keep both paper-based and electronic records. Paper records are kept in locked filing cabinets and electronic records are kept within our data management system which is password protected to maintain

- We retain information for a minimum of five years
- We will hold records in line with our records retention schedule.
- We use Egress Secure email to share information securely.

11. Safeguarding Thematic's

11.1 Social, Emotional and Mental Health needs

All staff are given regular in-depth training and have an awareness that children with additional needs or disabilities may be more vulnerable to abuse and additional barriers may exist when recognising abuse and neglect. As outlined in Keeping Children Safe in Education (2023) this could be because;

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Being more prone to peer group isolation than other children;
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers.

For more information on the Rapid Review process, Local Learning Reviews and Child Death Reviews, Working Together 2018 Chapters 4 and 5 should be consulted. Working Together 2018 paragraphs 25-27 provide more information on the expectation of school's role within the safeguarding partnership arrangements.

Further information on safeguarding SEND children is available in the non-statutory guidance Safeguarding Disabled Children (2009), but staff should speak with a DSL and SENDCo in the first instance. Mental Health is now explicitly included in the definition of safeguarding in KCSIE 21, which says that safeguarding includes "preventing impairment of children's mental and physical health or development". Mental health needs can be an indicator that a child has suffered abuse, and can put them at risk of abuse. Traumatic events can also have a lasting impact on a child's mental health, behaviour and education. Only trained professionals can diagnose mental health problems. But, as school staff, you are well-placed to spot signs that a child may be experiencing a mental health problem or may be at risk of developing one. Staff should also be aware that the pandemic has had a negative impact on the mental health of many children, some of whom have never previously experienced difficulties with their mental health.

If you have a mental health concern about a child that is also a safeguarding concern, follow school procedures for reporting. All staff are given training in recognising signs of abuse in children with additional needs and disabilities.

Trauma Informed Approach

The safety and welfare of our students is paramount to our educational practice. Many of our young people have histories of trauma and had adverse childhood experiences that prove barriers to learning. Our Welfare department works closely with students, their families, and teaching staff, ensuring that the individual's background is not only understood, but that it informs how we can work together to best support that young person.

Our welfare practice is trauma informed and underpinned by an in-depth understanding of attachment theory. We have a number of staff trained to use non-violent resistance (NVR) strategies, enabling them to respond to highly expressed emotion and confrontational behaviour while staying calm and communicating clearly rather than resorting to physical intervention. It is crucial that our students feel supported and heard, and our Welfare Team works to ensure that every aspect of a student's experience speaks to that. Staff from The Welfare Team often support teaching staff to facilitate the conflict resolution process used to address issues throughout the college.

The Welfare Team are specialist members of staff that aim to bridge the gap between the curriculum learning and wellbeing needs of students. Having a Link Worker embedded within the Welfare department,

helps to ensure that a student's programme of study meets their social, welfare and academic needs and targets.

11.2 Children who are missing from education or home educated

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children 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 college
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the college without a new school/college being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

11.3 Child-on-Child Abuse

We recognise that children 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". The victim will always be taken seriously and the victim should never be given the impression they are creating a problem nor be made to feel ashamed for making a disclosure avoiding alarm or distress. The law is there to protect young people and not to criminalise them.

We also recognise the gendered nature of Child-on-Child abuse (i.e. that it is more likely that girls will be victims and those with protected characteristics). However, Child-on-Child abuse is unacceptable and will be taken seriously. Child-on-Child abuse may include but is not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;

- non-consensual sharing of nude and semi-nude images and/or videos;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Most cases of students hurting other students will be dealt with under our college's behaviour 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, or sexually inappropriate pictures or videos (Including sexting)

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

- Staff must record the allegation and tell a DSL, but do not investigate it
 - A 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
 - A DSL will put a risk assessment and support plan into place for all children 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.
 - A DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- We will minimise the risk of Child-on-Child abuse by:
- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
 - Ensuring the child is never be given the impression they are creating a problem nor be made to feel ashamed for making a disclosure avoiding alarm or distress.
 - Being vigilant to issues that particularly affect different genders – for example, sexualized or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
 - Ensuring our curriculum helps to educate students about appropriate behaviour and consent
 - Ensuring students know they can talk to staff confidentially by speaking with all students on enrolment, during induction and regularly throughout the College year.
 - Ensuring staff are trained to understand that a student harming a child could be a sign that the child is being abused themselves, highlighting the concerns around intra-familial harm (within the family) and support required for siblings

Where the harm is attributable to sexually abusive behaviour or sexual harassment, the school will follow the CSCP Harmful sexual behaviour protocol; further details can be found in section below.

Within the KCSiE 2023 update some name changes to contact titles (such as change from 'Child Exploitation and Online Protection' – or CEOP – to 'National Crime Agency's CEOP Safety Centre'), changes were made to policies to align them with the Department for Education's 'behaviour in schools' guidance and statutory guidance titled 'School suspensions and permanent exclusions'. There are also additions for relevant new

guidance that has been published throughout the year, such as guidance on digital and technology standards and keeping children safe in out-of-school settings.

11.4 Harmful sexual behaviour, sexual violence and harassment

Sexual violence is defined as any act which is an offence under the Sexual Offences Act 2003, including rape, assault by penetration or sexual assault without the consent of the victim. Sexual harassment is defined as unwanted sexual conduct likely to violate the victim's dignity and/or make them feel intimidated, degraded or humiliated or create a hostile, offensive or sexualised environment. This includes making sexual comments or jokes, physical contact such as touching or interfering with clothing or displaying sexual images. It also includes online harassment.

Upskirting is defined as taking a picture under a person's clothing without them knowing with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence under the Sexual Offences Act 2003 and is a breach of children's rights as set out within the Human Rights Act 1998.

The college recognises that sexual violence and sexual harassment between students is a serious safeguarding issue and such behaviour will not be tolerated. college behaviour management and antibullying policies will reflect the college's approach and staff and students will be made aware of the standard of expected behaviour and the likely responses to any incidents of sexual violence and harassment.

The college will follow the statutory guidance Sexual violence and sexual harassment between students and will work with relevant agencies to safeguard and support victims, take appropriate action against alleged perpetrators and ensure a safe learning environment for all students.

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

The colleges is aware of our equality duty as victims of sexual violence and harassment are more likely to be female but should follow the same procedures and ensure the same level of response for incidents involving male pupils or incidents where victim and perpetrator are the same sex. As well as students with protected characteristics being at more risk of harm from such behaviour and the impact this can have on their wellbeing, requiring additional support.

The college will take all necessary steps to put in place a planned PSHE curriculum to convey the college's policy for preventing harmful sexual behaviour and to promote respectful behaviour between students with regards to sexual conduct. Sexual violence and harassment will also be addressed in general, whole school safeguarding training delivered by the CSCP, with DSL and Deputy's receiving more intense training in view of their role. The college will promote an environment where victims feel empowered to raise concerns and report incidents. Any reports of sexual violence or harassment will be taken seriously and thoroughly investigated by the college and appropriate referrals made to the police and CSCT.

The college will ensure that staff and governors receive relevant training to help them ensure an effective response to incidents that protects individual victims and safeguards the welfare of all students and staff. The college will ensure staff are able to provide appropriate support to victims and alleged perpetrators that meet their needs and continues to promote their education.

Procedures

The college will ensure there is a robust response to all incidents and will follow the procedures set out in Part 5 of the Keeping children safe in education statutory guidance.

Cases may be managed internally by the college under without referral to other agencies where the incident involves low-level concerns and is a “one-off” occurrence where there is no further risk to the victim or other pupils.

Reported incidents will be investigated by the member of staff to whom the young person discloses in partnership with a DSL, who will also carry out a risk assessment to look at any continued risk to the victim or other students and staff from the alleged perpetrator within the college environment.

Where the allegation involves material posted online, the college will request that the electronic device is handed over as part of the investigation and will use legal powers to search and confiscate property as set out in the statutory guidance Searching, screening and confiscation advice for schools/colleges.

<https://www.gov.uk/government/publications/searching-screening-and-confiscation>

The member of staff and DSL will write up a record of the investigation that will set out how the college will respond to the incident. We will ensure that the written report of the incident contains objective facts and sets out clearly the next steps to be taken, with the views of the victim clearly recorded.

Decisions on responses will be based on the harmful sexual behaviour risk assessment and thresholds set out in the CSCP Harmful sexual behaviour protocol. A DSL may take advice from MASH Social Workers before making a decision. Possible outcomes include referral to Early Help Services, CSCT or the police, or managing the matter internally under college behaviour policies.

Where a referral will be made to CSCT or the police under the protocol, a DSL will discuss the issue with the relevant agency and following this discussion a decision will be made on whether and how to inform the alleged perpetrator and their parents. The college will take any necessary action to continue to safeguard the victim and other students within the college environment based on the level of risk established from the risk assessment, including decisions about the victim and alleged perpetrator sharing classrooms. These decisions will be reviewed in the light of on-going police and CSCT investigations to take account of any changes in the status of investigations and any bail conditions placed on the alleged perpetrator.

Where necessary and appropriate, the college will consider the support needs of the alleged perpetrator and will make referrals to relevant agencies for support on their behalf under the Harmful Sexual Behaviour protocol.

<https://cscp.org.uk/resources/sexual-harmful-behaviours/> [Supporting practice in tackling child sexual abuse - CSA Centre](#)

11.5 Sexting

Staff responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to a DSL immediately.

You must not:

- i) View, download or share the imagery yourself, or ask a student to share or download it. If you have already viewed the imagery by accident, you must report this to a DSL,
- ii) Delete the imagery or ask the student to delete it
- iii) Ask the student(s) who are involved in the incident to disclose information regarding the imagery (DSL’s responsibility)
- iv) Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- v) Say or do anything to blame or shame any young people involved
- vi) You should explain that you need to report the incident, and reassure the student(s) that they will receive support and help from a DSL.

Initial review meeting

Following a report of an incident, a DSL will hold an initial review meeting with appropriate college staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to the student(s),
- If a referral needs to be made to the police and/or children's social care,
- If it is necessary to view the imagery in order to safeguard the young person
(In most cases, imagery should not be viewed),
- What further information is required to decide on the best response

Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)

- Whether immediate action should be taken to delete or remove images from devices or online services,
- Any relevant facts about the students involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the students involved (in most cases parents should be involved)

- The DSL will make an immediate referral to police and/or children's social care if:
 - The incident involves an adult
 - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent
(For example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any student in the imagery is under 13
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above applies then the DSL, in consultation with the Head of College and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review by the DSL - If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

They will hold interviews with the students involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done either through local neighbourhood police or by dialing 101. Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 10 of this policy also apply to recording incidents of sexting. Curriculum coverage

Students are taught about the issues surrounding sexting as part of our PSHE education and computing programmes. Teaching covers the following in relation to sexting:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive

- Issues of legality
- The risk of damage to people’s feelings and reputation Students also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on sexting is also shared with students so they are aware of the processes the college will follow in the event of an incident.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/647389/Overview_of_Sexting_Guidance.pdf

11.6 Prevention of radicalisation

The college’s safeguarding duty includes the duty to promote British values in order to counter the extremist narrative and prevent young people from being radicalised and drawn into terrorism.

[Advice template \(publishing.service.gov.uk\)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/647389/Advice_template_(publishing.service.gov.uk))

Under Counter-Terrorism and Security Act 2015, the college also has a duty to refer young people on to Islington’s Channel Panel under the Prevent strategy where there are concerns that they are being radicalised.

[Revised Prevent duty guidance: for England and Wales - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/647389/Revised_Prevent_duty_guidance_for_England_and_Wales_-_GOV.UK_(www.gov.uk))

The college will follow the guidance set out in the CSCP guidance “Safeguarding children and young people from radicalisation and extremism” where:

- a college has concerns that a young person might be considering extremist ideologies and/or may be radicalised and would benefit from specialist support to challenge extremist ideologies, or
- that a younger pupil may be at risk due to their parent’s radicalisation.

The guidance is available at: [Radicalisation and Extremism - Camden Safeguarding Children Partnership — CSCP](https://www.camden.gov.uk/childrens-social-care/safeguarding-children-and-young-people/radicalisation-and-extremism)

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to a DSL first to agree a course of action.

If in exceptional circumstances a DSL is not available, this should not delay appropriate action being taken. Speak to a member of the College leadership team and/or seek advice from local authority children’s social care/duty officer.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government’s programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children’s social care team. Schools/colleges should always be a safe space for young people to explore new ideas and perspectives, and develop their critical thinking skills. Where there are concerns about radicalisation and a referral to Channel Panel is being considered the college should discuss these concerns internally and also consider external advice and guidance where necessary and appropriate.

The college DSL should be consulted for internal advice on making a referral. Prior to making a referral the school may also speak to and get advice from their police schools’ officer (if they have one), the Police Prevent Engagement Officer (Mark Fowler, Mark.P.Fowler@met.pnn.police.uk or call 0208 733 6014) and Islington’s Prevent coordinator (Albert Simango, albert.simango@Islington.gov.uk or call 020 7974 2010) or the Prevent Education Officer (Jane Murphy, jane.murphy@Islington.gov.uk or call 020 7974 1008). The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which college staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations. In an emergency, call 999. You can call the confidential anti-terrorist hotline on 0800789321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

11.7 Mandatory reporting of Female Genital Mutilation (FGM)

The college will follow the statutory guidance on FGM in order to safeguard girls who are at risk of FGM:

[Multi-agency statutory guidance on female genital mutilation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/multi-agency-statutory-guidance-on-female-genital-mutilation)

Where a student makes a disclosure of FGM, the college will follow the mandatory reporting rules and make appropriate referrals to the police as set out in the statutory guidance available at: [Mandatory reporting of female genital mutilation: procedural information - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/mandatory-reporting-of-female-genital-mutilation-procedural-information)

All concerns around FGM, including any disclosure made by a student, will be discussed with a DSL before any action is taken.

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 1.

Any member of staff who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a student under 18 must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a student under 18 must speak to a DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out must speak to a DSL and follow our local safeguarding procedures.

11.8 Online safety

Cybercrime is criminal activity committed using computers and/or the internet. Cyber Choices aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as online bullying or general on-line safety.

Children should have the right to explore the digital environment but also the right to be safe when on it. However, technology often provides the platform that facilitates harm, and the use of technology has become a significant component of many safeguarding issues. Examples of which include child sexual exploitation; child criminal exploitation; radicalisation; sexual predation/grooming; and forms of child-on-child abuse such as cyberbullying and nudes and semi-nudes.

In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online, which can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. In accordance with Behaviour in Schools. Advice for Headteachers and school staff (September 2022), the school promotes as part of its culture of excellent standards of behaviour that the same standards of behaviour are expected online as apply offline, and that every student should be treated with kindness, respect and dignity.

An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk that should form the framework for school's approach to Online Safety:

- **Content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racism, prejudice-based content, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism;
- **Contact:** being subjected to harmful online interaction with other users; for example, peer to peer pressure, commercial advertising as well as adults posing as children or young adults with the intention of grooming or exploiting them for sexual, criminal; financial or other purposes;
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images (e.g. consensual or non-consensual sharing of nudes and semi-nudes), and/or pornography, sharing other explicit images and online bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. When students are at risk of phishing, school can reports concerns to the Anti-Phishing Working Group (<https://apwg.org/>).

Additional advice can be found at: Cyber Choices, '[National Cyber Security Centre - NCSC.GOV.UK](https://www.ncsc.gov.uk) as well as the Government advice: [Harmful online challenges and online hoaxes - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

As part of The ArtsXchange duty to provide a safe learning environment and ensure students are taught how to remain safe online, the college will implement the recommendations of Islington's model schools' online policy available at: [Schools and Nurseries Safeguarding Policies - Camden Safeguarding Children Partnership – CSCP](#)

For more information, please refer to our E-Safety Policy.

11.9 Looked after and previously looked after children and care leavers

The college recognises that looked after and previously looked after children and care leavers are particularly vulnerable due to their status and their pre-care experiences.

The college's designated teacher for LAC and care leavers has specialist knowledge of the issues faced by this cohort and for this reason, a DSL will consult with the Designated Teacher to seek advice whenever there are concerns about the welfare of a looked after or previously looked after child or care leaver.

TheArtsXchange is aware of the duty to promote the education of previously looked after children; these are defined as children who have left the care system as a result of adoption or special guardianship order. It is recognised that these children may face the same difficulties and have the same vulnerabilities as looked after children.

We also consider the potential vulnerability of relevant children; these are children who under the Leaving Care Act are children who are aged 16-17 and who were but are no longer looked after.

Many of our students aged 16 and 17 who remain looked after are living in semi-independent accommodation and are particularly vulnerable to a wide range of safeguarding issues and as such DSL's link with the Designated Teacher for Looked After Children where safeguarding concerns are raised.

11.10 Children with special education needs or disabilities (SEND)

We recognise that students with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Students being more prone to peer group isolation than other students

- The potential for students with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

We offer extra pastoral support for pupils with SEN and disabilities. College policies reflect these issues and recognise that staff need to be able to help this group to overcome barriers to seeking help. The College will follow the CSCP guidance Safeguarding children with disabilities available at:

[Safeguarding-children-and-young-people-with-disabilities-guidance.pdf \(cscp.org.uk\)](https://www.cscp.org.uk/Safeguarding-children-and-young-people-with-disabilities-guidance.pdf) Please refer to our SEND Policy for more information.

11. 11 LGBTQ+

The College recognises that LGBTQ+ children and young people can be targeted by others as can children perceived to be LGBTQ+ who can be just as vulnerable. We will ensure that children and young people have a trusted adult to share concerns with and we will work to consider how the College can reduce additional barriers faced and how safe spaces can be provided for them to talk or share concerns. We will use the [Statutory Guidance on Relationships, Sex and Health Education](#) for support on addressing homophobic, biphobic and transphobic bullying and abuse.

11.11 Safeguarding vulnerable groups

The College is aware that some students may be living in circumstances that may make them more vulnerable to abuse, neglect or poor outcomes and who may need help or intervention from Early Help Services, CSCT or other agencies in order to overcome problems or keep them safe.

The college will adhere to the following policies in order to respond to the needs of these vulnerable groups.

So-called 'honour-based' violence (HBV, including FGM and forced marriage) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBV or already having suffered it. If staff have a concern, they will speak to a DSL, who will activate local safeguarding procedures.

11.12 Children at risk of forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and since February 2023 it is a crime to carry out any conduct whose purpose it is to cause a child to marry before their 18th birthday, even if violence, threats or other form of coercion are not used. As with existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to a DSL.

The DSL will:

- Speak to the student about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the student to an education welfare officer, pastoral tutor, learning mentor, or college counsellor, as appropriate

[The right to choose: government guidance on forced marriage - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/the-right-to-choose)

11.13 Domestic abuse and/or sexual violence

Domestic Abuse includes a range of behaviours, this can be a single or pattern of behaviours and children are also victims of Domestic Abuse which can have a detrimental impact on their health, well-being, development and ability to learn.

The definition of domestic abuse now includes victims aged 16 and 17 years old and these victims should be referred to Islington Safety Net for a service in their own right. Schools or colleges can refer young people affected by domestic or sexual violence to the specialist worker based in the Islington Safety Net on 020 7974 1864 for advice and support.

<https://cscp.org.uk/resources/domestic-violence-and-abuse/>

11.14 Privately fostered children

We have a legal duty to notify Islington of any student they know to be privately fostered. Schools/colleges should contact the Fostering team on 020 7974 6783 to notify Islington of any private fostering arrangements that come to their notice.

<https://cscp.org.uk/resources/private-fostering-resources/>

11.15 Young carers <https://cscp.org.uk/resources/young-carers/>

If the college has concerns about a student, we believe to be a young carer, we will contact Family Action on 020 7272 6933 for advice and can refer the pupil on for services and support. Further details can be found on the website: <https://www.family-action.org.uk/what-we-do/childrenfamilies/send/islingtonsend/>

<https://cscp.org.uk/resources/young-carers/>

11.16 Mobile phones and cameras

Staff are allowed to bring their personal phones to college for their own use, but will limit such use to noncontact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with students.

Staff will not take pictures or recordings of students on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the college.

11.17 Contextual safeguarding and extra-familial harm

The college is aware that as young people grow more independent and spend more time away from home, they may face more risk from safeguarding threats outside of the home. These threats may be from within the community, from other students at college or from their own peer group rather than from within the family (extra-familial harm).

Whenever staff are made aware of any safeguarding incident or concerning behaviour that has taken place out of the home and that has put a young person at risk, staff will consider this in the context of the young person's peer relationships and the wider environment when assessing the level and nature of the risk and making decisions on referrals.

The college will adhere to the following principles whenever there are concerns that young people are at risk from extra-familial harm:

Young people can be at risk from extra-familial harm such as threats to their safety or welfare arising from behaviours and circumstances occurring outside of the home such as substance misuse, involvement in gangs, serious violence, criminal and sexual exploitation. Even though in most cases there are no concerns about parenting, these threats may still raise safeguarding concerns that need to be addressed.

We will be aware of the indicators that a young person may be involved in violent crime or may be being criminally exploited and as such at risk from becoming a victim of violence. Indicators include absenteeism, changes in friendship groups, declining academic performance, changes in emotional welfare and signs of physical assault.

Those children who are involved in county lines exploitation (where the child is coerced into selling drugs) may also be in possession of goods and money and may own several mobile phones. Using the Toolkit for

professionals when there are concerns around Child Exploitation: [County Lines and Child Exploitation Toolkit For Professionals](#)

11.18 Children at risk of sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. If a member of staff suspects CSE, they will discuss this with a DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing college or education, or not taking part in education [CSCB-multi-agency-guidance-on-child-sexual-exploitation.pdf \(cscp.org.uk\)](#)

11.19 Child Criminal Exploitation (Including Involvement in 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 children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can 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 -See KCSIE (2023).

Staff in school are aware of the occurrence of children being vulnerable to potential exploitation through links with older children in the community, online gaming and social media. Contextual knowledge of our community and staff vigilance means that any concerns are logged and acted upon promptly. Children are taught about the dangers of being influenced and involved in criminal activities during PHSE lessons at an age appropriate level and parents are offered support via workshops during the year.

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

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

11.20 Young people at risk from gang activity or serious violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. As stated within KSCiE (2023) there are a range of risk factors which could increase the likelihood of involvement in serious violence such as but not limited to:

- Change in friendships or relationships with older individuals or groups
- Decline in performance or attendance
- Signs of self-harm or a significant change in wellbeing
- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment and having been involved in offending, such as theft or robbery
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Advice and further information can be found for safeguarding children and young people who may be affected by gang activity, Islington has a comprehensive strategy for reducing the risks posed by gang activity, and schools can refer young people to the Young Person's Advocate based in the Youth Offending Service on 020 7974 6174 for advice. <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adultscounty-lines>

11.21 Modern slavery and trafficked children

The CSCP protocol provides guidance for agencies where it is thought children have been trafficked into or within the UK or where they are vulnerable to modern slavery/forced labour. This includes young people who are criminally exploited under the county lines model. For more information on county lines see the Home Office guidance: <https://www.gov.uk/government/publications/criminal-exploitation-of-childrenand-vulnerable-adults-county-lines> <https://cscp.org.uk/resources/child-trafficking-and-modern-slavery/>

11.22 Children who run away/go missing

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will inform parents/carers and referrers immediately and, where necessary we will contact social services and other professionals involved with the young person. The ArtsXchange is aware that many of these forms of exploitation are linked and that going missing from home or from education can be an indicator that young people are involved in child sexual exploitation, gang activity, modern slavery, criminal exploitation and trafficking. <https://cscp.org.uk/resources/missing-children-from-home-and-care/>

11.23 Remote Learning

The safeguarding risks associated with virtual and remote learning are similar to those associated with in person learning. These include peers becoming engaged in inappropriate conversations, using inappropriate or threatening language or abuse, which may encompass behaviour aimed at causing emotional and mental harm/distress. Examples of different forms of online harm are, online grooming, exposure to harmful content, online sexual harassment and abuse, use of threats or blackmail related to online activity, cyberbullying, online radicalisation, pressure to send sexual image /onward sharing and all variations on

these themes. We need to be vigilant and attentive to issues of this matter that can take place online. It is our responsibility to set the standard of expectations and facilitate positive behaviour for learning online. Education staff need to clearly state high expectations for online communication and behaviour as they would in the physical classroom. Students should be made aware that audio/visual recording of sessions is not acceptable, however it should be stated that all text conversations are recorded automatically.

Before we engage in online video learning sessions, it is important to consider:

Your environment:

- You should locate in a quiet space and inform family members/cohabiters that you are engaging with online learning. This will ensure that the learning environment is focused on the needs of learners and the teacher & student relationship can focus on learning.
- Confidentiality and security need to be maintained and students should feel secure that this is the case.
- You should be dressed appropriately for work and as stipulated in the 'Dress Code' policy. Being dressed in sleep wear or underwear is considered inappropriate and day time clothing must be worn for all online video learning.
- You must choose a 'background' from the selection bar during the video lesson in order to obscure and block students from observing your home area.

The Students Environment:

Where possible, it is advisable that students are located in a common space in their house, within earshot of parents.

- Students should also use the 'background' function on their computer screens to minimise the ability for others to observe their homes.
- Staff should encourage students to be dressed and ready for learning as if attending college.

11.24 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. A DSL (including deputies) will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures). Where a child has been harmed or is at risk of harm, a DSL will also make a referral to children's social care.

11.25 Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in using the InVentry system and wear a visitor's badge. Visitors to the college who are visiting for a professional purpose, such as educational psychologists and college improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational Psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the college any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using college facilities is not seeking to disseminate extremist views or radicalise students or staff.

11.26 Complaints and concerns about college safeguarding policies

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3). Other complaints, please refer to the TheArtsXchange Complaints Policy.

Whistleblowing - Please refer to The Arts Xchange Whistle Blowing Policy which aims to encourage individuals affected to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated and that their confidentiality will be respected. As an essential means to ensure the safety of the Young People whom attend The Arts Xchange.

As well as let all staff know how to raise concerns about potential wrongdoing in or by the trust, setting clear procedures for how this will be responded to. Advising all staff of the protection available to them if they raise a whistle-blowing concern. Assuring staff that they will not be victimised for raising a legitimate concern through the steps set out in the policy even if they turn out to be mistaken.

11.27 Other relevant safeguarding policies

This policy links to the following policies and procedures:

- Behaviour and Anti-Bullying
- E-Safety
- Staff Code of conduct
- Complaints
- Whistleblowing
- Data Protection
- Health and safety
- Attendance
- Equality
- Sex and relationship education
- First aid
- Curriculum

11.28 Emergency contacts for Social Care and additional guidance

In the unlikely event that a member of school staff who is not part of the safeguarding team, needs to make a safeguarding notification to the local authority where a student resides, the contact numbers are listed below.

- Barking & Dagenham - 020 8227 3811 out of hours 020 8215 3000
- Camden - 020 7974 3317 out of hours 020 7974 4444
- Enfield - 0208 379 5555 out of hours 020 8379 2483
- Essex - 0345 603 7627 out of hours 03456061212
- Hackney - 020 8356 5500 out of hours 020 8356 2710
- Haringey - 020 8489 4470 out of hours 020 8489 0000
- Islington - 020 7527 7400 out of hours 0207226 0992
- Newham - 020 3373 4600 out of hours 020 8430 2000
- Redbridge - 020 8708 3885 out of hours 020 8708 5897
- Southwark - 020 7525 1921 out of hours 020 7525 5000
- Thurrock - 01375 652 802 out of hours 01375 372 468
- Tower Hamlets - 0207 3645006 out of hours 020 7364 4079
- Wandsworth - 020 8871 6622 out of hours 020 8871 6000
- Westminster - 020 7641 7913 out of hours 020 7641 6000

Please also see:

Alternative provision <https://www.gov.uk/government/publications/alternative-provision>

Attendance <https://www.gov.uk/government/publications/parental-responsibility-measures-for-behaviour-and-attendance>

Behaviour and discipline <https://www.gov.uk/government/publications/behaviour-and-discipline-in-schools-guidance-for-governing-bodies>

Bullying (including cyberbullying) <https://www.gov.uk/government/publications/approaches-to-preventing-and-tackling-bullying>

Children missing from school/college <https://www.gov.uk/government/publications/children-missing-education>

Drugs/substance misuse [Drugs: advice for schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/drugs-advice-for-schools)

Exclusion of pupils/students [School suspensions and permanent exclusions - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/school-suspensions-and-permanent-exclusions)

Fabricated or induced illness [Schools, colleges and children's services : Safeguarding children - detailed information - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/schools-colleges-and-childrens-services-safeguarding-children-detailed-information)

Faith abuse [Child abuse linked to faith or belief: national action plan - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/child-abuse-linked-to-faith-or-belief-national-action-plan)

Forced Marriage [Forced marriage protection orders - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/forced-marriage-protection-orders)

Forced Marriage Unit - Contact: 020 7008 0151 or email fm@fcdo.gov.uk

Supporting children with medical conditions [Supporting pupils with medical conditions at school - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/supporting-pupils-with-medical-conditions-at-school)

Mental health [Mental health and behaviour in schools \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/publications/mental-health-and-behaviour-in-schools)

Physical intervention [DfE advice template \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/publications/dfes-physical-intervention-advice-template)

Promoting British values/Radicalisation and violent extremism

[Promoting fundamental British values through SMSC - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/promoting-fundamental-british-values-through-sm-sc)

Relationships and Sex Education (RSE)

[Relationships and sex education \(RSE\) and health education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/relationships-and-sex-education-rse-and-health-education)

Trafficking [Safeguarding children who may have been trafficked \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked)

Health and safety [Health and safety in schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/health-and-safety-in-schools)

Appendix 1: Definitions

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person

Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction

Seeing or hearing the ill-treatment of another

Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Possible indicators of abuse and neglect

Neglect	<p>Inadequate or inappropriate clothing</p> <p>Appears underweight and unwell and seems constantly hungry</p> <p>Failure to thrive physically and appears tired and listless</p> <p>Dirty or unhygienic appearance</p> <p>Frequent unexplained absences from school</p> <p>Lack of parental supervision</p>
Physical abuse	<p>Any injury such as bruising, bite marks, burns or fractures where the explanation given is inconsistent with the injury</p>
	<p>Injuries in unexpected places or that are not typical of normal childhood injuries or accidents</p> <p>High frequency of injuries</p> <p>Parents seem unconcerned or fail to seek adequate medical treatment</p>
Sexual abuse	<p>Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child's age/stage of development</p> <p>Sexual risk-taking behaviour including involvement in sexual exploitation/older boyfriend</p> <p>Continual, inappropriate or excessive masturbation</p> <p>Physical symptoms such as injuries to genital or anal area or bruising, sexually transmitted infections, pregnancy</p> <p>Unwillingness to undress for sports</p>
Emotional abuse	<p>Developmental delay</p> <p>Attachment difficulties with parents and others</p> <p>Withdrawal and low self-esteem</p>
Indirect indicators of abuse and neglect	<p>Sudden changes in behaviour</p> <p>Withdrawal and low self-esteem</p> <p>Eating disorders</p> <p>Aggressive behaviour towards others</p> <p>Sudden unexplained absences from school</p> <p>Drug/alcohol misuse</p> <p>Running away/going missing</p>
Parental attributes	<p>Misusing drugs and/or alcohol</p> <p>Physical/mental health or learning difficulties</p> <p>Domestic violence</p> <p>Avoiding contact with school and other professionals</p>

Appendix 2: College central record

This record should indicate what checks have been taken out for the following:

- For schools and colleges, all staff, including supply staff and teacher trainees on salaried routes, who work in school/college and others who work in regular contact children in school, including volunteers.
- For independent schools/colleges, including academies and free schools as above plus all members of the proprietorial body and involved in the management of the school/college.
- For colleges, all staff providing education and/or whose positions involve a relevant activity.

Agency staff

Please give details of confirmation of checks that have been carried out by the supplying agency.

Volunteers

Unsupervised volunteers should not be left alone or allowed to work in regulated activity.

For new volunteers in regulated activity who regularly teach children unsupervised an enhanced DBS is needed with a barred list check.

For new volunteers not in regulated activity, schools should obtain an enhanced DBS certificate.

Existing volunteers who provide personal care, the school should consider obtaining an enhanced DBS.

Existing volunteers who are unsupervised do not need to have a DBS check with a barred list check because the volunteer should have been checked originally.

For existing volunteers not in regulated activity there is no requirement for an enhanced DBS check (a school can request one but may not request a check of the barred list).

For a volunteer not engaging in regulated activity a risk assessment should be made and a professional judgment made about the need for an enhanced DBS check.

Supervision of volunteers – there must be supervision by a person in regulated activity, where supervision occurs, this must be regular and day to day and the supervision must be reasonable in all the circumstances to ensure the protection of children. Regulated activity

Regulated activity (see p20 for definition) – the period condition is at any time on more than three days in any period of 30 days. ‘Frequently’ is doing something once a week or more. Work of the nature defined is considered regulated activity if done regularly; where this is the case an enhanced DBS check is needed with a barred list check. Contractors

Contractors or employees of contractors working at the school should have the appropriate level of DBS check if a check is required, e.g. if the contractor is carrying out teaching or providing a level of care or supervision of children regularly. Documents and certificates

Please give details of any documentary evidence obtained as part of each check. Please note that there is no requirement to list DBS numbers. Also, to comply with the Data Protection, DBS certificates should not be retained any longer than six months. Other documents to verify identity, right to work in the UK etc, should be kept in personnel files.

Record of checks taken out and/or certificates obtained:

- Post and date of commencement
- Identity Checks (Note 1)
 - Name

- DOB
- Address
- Evidence of identity check made by (name and/or post title), document seen and date
- Children's Barred List (Note 2)
 - Date Children's Barred List check undertaken
- Prohibition from teaching check (date and name of person carrying out check)
- Enhanced DBS (Note 3)
 - Disclosure Number & Level
 - Check made by and date
- Right to work in the UK (Note 4)
 - What evidence of right to work in UK was provided?
 - Check made by and date
- Qualifications (Note 5)
 - Is a Qualification a requirement for the post
 - What Qualification was provided
 - Check made by and Date
- Overseas Checks (See Note 6)
 - What further checks have been made
 - Check made by and date
- References
 - Reference 1
 - Reference 2

Appendix 3: Allegations of abuse made against staff or volunteers

1. Aims

This policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children
- It applies regardless of whether the alleged abuse took place in the college.

Allegations against a staff member or volunteer who is no longer working at the college and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgment.

2. Suspension

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the college so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the college so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

3. Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

4. Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Head of College (or chair of governors where the Head of College is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the college is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the college and their contact details
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in college and/or liaise with the police and/or children’s social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children’s social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)

- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the college is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the governing board will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the college's disciplinary process, should this be required at a later point.

5. Timescales

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week

If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days

If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

6. Specific actions

Action following a criminal investigation or prosecution:

- The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated:

- If the allegation is substantiated and the individual is dismissed or the college ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the college's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
- If the individual concerned is a member of the teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

7. Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the college.

8. Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Head of College, or other appropriate person in the case of an allegation against the Head of College will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a student.

9. Confidentiality

The college will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

10. Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)
- If an allegation or concern is not found to have been malicious, the college will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.
- Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

11. References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

12. Learning lessons

After any cases where the allegations are substantiated or unsubstantiated, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the college's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Review practices and circumstances to measure how lessons can be learned to prevent any future occurrence
- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.