


**ST ANDREW'S COLLEGE POLICY DOCUMENT**

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## INTRODUCTION

The College proprietor is Dukes Education Group.

This policy applies to the college including its boarding department, and to staff, volunteers, governors and contractors working with students on college premises or away from the college on an activity, visit or other educational pursuit.

This policy has been developed in accordance with the principles established in the following guidance and acts, and in accordance with guidance published by the Cambridge & Peterborough Partnership Safeguarding Board.

- Education Act 2002, section 157/175
- The Children Act 1989 and 2004 and the Education Act 2002, section 157/175
- 'What to do if you are worried a child is being abused 2015' - Advice for practitioners
- Prevent Duty Guidance: School specific advice (July 2015, latest updates April 2019)
- HM Government 'Working Together to Safeguard Children July 2018'
- 'Keeping Children Safe in Education.' (DfE Sept 2021)
- Sexual Violence and Sexual Harassment Between Children in Schools & Colleges (DfE Sept 2021)

This policy is available on the college website and as a printed copy on request.

The Safeguarding Policy should be read alongside and in conjunction with the Anti-Bullying, Health and Safety, Physical Intervention, Whistleblowing and Recruitment policies. Together these constitute the suite of policies to safeguard and promote the welfare of students in St. Andrews College. Should the College be operating differently as a result of coronavirus procedures will be adapted accordingly and this is detailed in the safeguarding addendum on the college website.

- **If a concern is brought to you concerning a student, you must bring it to the attention of the DSL or one of the Deputy DSLs immediately.**
- **If a concern is brought to you concerning a member of staff, you must bring it to the attention of the Principal immediately.**
- **If a concern is brought to you concerning the Principal, you must bring it to the attention of the nominated Governor with responsibility for Safeguarding, Tim Fish, immediately and the Principal should not be informed.**
- **If a concern is brought to you concerning a Governor, you must bring it to the attention of the Principal immediately.**

Safeguarding incidents may happen anywhere both onsite and away from college and staff should be alert to the possibility of concerns being raised at college. At St Andrews College we will ensure that we have appropriate procedures in place for responding where we believe that a child has been abused or is at risk of abuse. The procedures also cover circumstances in which a member of staff is accused of, or suspected of, abuse, including enabling staff to raise concerns about low level behaviours of adults.

At St Andrews College we understand that promoting the welfare of children is everyone's responsibility. Everyone has a role to play in safeguarding young people. This means that all staff should consider, at all times, what is in the best interests of the young person. As a college we recognise the additional vulnerability of students with SEND, who are living away from home and who's English is a second language.

All college staff are expected to read and understand the following documents and to understand their role in keeping the young people in our care safe.

- The College Staff Code of Conduct (updated Aug 2021)
- Keeping Children Safe in Education, Part one and Annex A (Sept 2021)
- Working Together to Safeguarding Children (2018)
- What to do if you're worried a child is being abused: Advice for practitioners (2015)
- The Prevent Duty: Departmental advice for schools and child care providers (2015)
- National Minimum Standards for Boarding Schools 2015 (Boarding & Pastoral staff)

Through their day-to-day contact with students and direct work with families, **all St Andrews College staff** have a responsibility for:

- Understanding that safeguarding is everyone's responsibility
- Identify concerns early to prevent them from escalating
- Provide a safe environment in which our students can learn
- Identify young people who may benefit from early help
- Know what to do if a young person tells them he/she is being abused or neglected
- Follow the referral process if they have a concern
- Know how to report low level concerns regarding adults' behaviour

This policy sets out how the school's governors discharge their statutory responsibilities relating to safeguarding and promoting the welfare of children who are students at the school. Our policy applies to all staff, paid and unpaid, working in the college including homestay hosts and governors. Support staff, social organisers, house managers, office staff as well as teachers can be the first point of disclosure for a child. Concerned parents/carers may also contact the school and its governors.

This policy is consistent with the Cambridgeshire and Peterborough Safeguarding Children Partnership Board procedures and has been updated to reflect latest government guidance including 'Sexual Violence and sexual harassment between children in schools and colleges' (September 2021).

## **Types of abuse**

Child abuse has many different forms but is categorised under the following with both Physical and Behavioural indicators:

- Physical Injury
- Neglect
- Sexual Abuse
- Emotional Abuse

Staff should also be alert to the possibilities of child sexual exploitation, female genital mutilation and the radicalisation of children, a more detailed definition of these are described below.

Remember also that abuse can take place wholly online and that technology can be used to facilitate offline abuse. Sexual abuse of children may be committed by other children. The signs and symptoms (below) may be indicators of abuse but bear in mind that children may exhibit one or more of these signs for other reasons. Any concerns must be reported to one of the DSLs immediately. Definitions of the forms of abuse according to Keeping Children Safe in Education are given below:

### **Abuse**

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family, institution or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or by another child or children.

### **Physical abuse**

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

### **Emotional abuse**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children

frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### **Sexual abuse**

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (peer on peer abuse).

### **Neglect**

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

### **Signs and symptoms**

Everyone should be aware of the signs and symptoms as given by the NSPCC and report any concerns.

#### **Physical signs of abuse may include**

- unexplained bruising, marks or injuries on any part of the body
- multiple bruises- in clusters, often on the upper arm, outside of the thigh
- cigarette burns
- human bite marks
- broken bones
- scalds, with upward splash marks,
- multiple burns with a clearly demarcated edge

#### **Changes in behaviour that can indicate physical abuse include**

- fear of parents being approached for an explanation
- aggressive behaviour or severe temper outbursts
- flinching when approached or touched
- reluctance to get changed, for example in hot weather

- depression
- withdrawn behaviour
- running away from home

**Changes in behaviour which can indicate emotional abuse include**

- neurotic behaviour eg sulking, hair twisting, rocking
- being unable to play
- fear of making mistakes
- sudden speech disorders
- self-harm
- fear of parent being approached regarding their behaviour
- developmental delay in terms of emotional progress

**Physical signs of sexual abuse may include**

- pain or itching in the genital area
- bruising or bleeding near genital area
- sexually transmitted disease
- vaginal discharge or infection
- stomach pains
- discomfort when walking or sitting down
- pregnancy

**Changes in behaviour which can also indicate sexual abuse include**

- sudden or unexplained changes in behaviour eg becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- having nightmares
- running away from home
- sexual knowledge which is beyond their age, or developmental level
- sexual drawings or language
- bedwetting
- eating problems such as overeating or anorexia
- self-harm or mutilation, sometimes leading to suicide attempts
- saying they have secrets they cannot tell anyone about
- substance or drug abuse
- suddenly having unexplained sources of money
- not allowed to have friends (particularly in adolescence)
- acting in a sexually explicit way towards adults

**Physical signs of neglect may include**

- constant hunger, sometimes stealing food from other children
- constantly dirty or smelly
- loss of weight, or being constantly underweight
- inappropriate clothing for the conditions

**Changes in behaviour which can also indicate neglect may include**

- complaining of being tired all the time
- not requesting medical assistance and/or failing to attend appointments

- having few friends
- mentioning being left alone or unsupervised

The above signs and symptoms may or may not be because of child protection/safeguarding issues but should be a consideration.

## **Safeguarding issues**

### **Child sexual exploitation (CSE)**

Is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.

Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology.

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

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

### **Child Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE:

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

### **Honour-based abuse**

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

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

### **Female Genital Mutilation**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Teachers should also be alert to girls talking about 'going abroad for a special ceremony or 'to become a woman' and discuss with the DSL and involve Cambridge & Peterborough Partnership Safeguarding Board without delay.

### **Radicalisation**

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



designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

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

### **Child missing from education**

All children, regardless of their circumstances, are entitled to a full-time education. A child going missing from education may be an indicator of abuse or neglect. In addition, children who go missing or run away from home or care may be in serious danger and are vulnerable to crime, sexual exploitation or other types of harm, as well as missing education. It is essential that all staff are alert to the signs to look out for and the individual triggers to be aware of when considering the risks of safeguarding concerns such as domestic violence, FGM, forced marriage and travelling to conflict zones.

The colleges will inform the local authority of any local student who fails to attend regularly, or has been absent without the school/college's permission for a continuous period of 10 school days or more.

For the college's international students, there are separate regulations regarding any sponsored student who misses 10 contact points.

If a member of staff becomes aware that a child may have run away or gone missing, the DSL or DDSL should try to establish with the Houseparent/parents/carers, what has happened. If this is not possible, or the child is missing, the DSL would meet with the form teacher or personal tutor and assess the child's vulnerability. Where the risk of harm is suspected, the DSL would consider a discussion with parents, if appropriate, reporting the child missing to the police and contacting Children's Social Care.

### **Domestic abuse**

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

- psychological
- physical
- sexual
- financial
- emotional

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

### **County lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily

become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. Like other forms of abuse and exploitation, county lines exploitation:

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

At St. Andrews College, we understand that many of our students are vulnerable as they are living away from home and speak English as a second language.

### **Serious violence**

St Andrews staff are aware of indicators that may signal a child is at risk from or involved with serious

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

### **Mental health**

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

### **Early help**

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

- is disabled and has specific additional needs

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

### **Child in need**

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

### **Roles and responsibilities of the DSL**

St Andrews DSL is also our Prevent Lead and on-line safety lead. The DSLs will always seek the advice of local services and the broad areas of responsibility for the designated safeguarding lead are, as described in annex B of KCSIE to manage referrals and:

- Refer promptly all cases of suspected abuse to the local authority children's social care
- Refer all cases which concern a staff member to the designated local authority team
- Refer all Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or police (cases where a crime may have been committed)
- Liaise with the Principal to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- Share information with teachers and school leaders about the welfare, safeguarding and child protection issues that students have experienced with a view to better understanding how to best support these children in college.
- Report weekly an update on safeguarding issues to governors and the Principal and contribute to full termly safeguarding reporting.

- **Training**

The DSL should receive appropriate training carried out every two years in order to:

- Understand the assessment process for providing early help and intervention, eg through locally agreed common and shared assessment processes such as early help assessments

- Have a working knowledge of how local authorities conduct a Child Protection case conference and a Child Protection review conference and be able to attend and contribute to these effectively when required to do so
  - Ensure each member of staff has access to and understands the College's Safeguarding/Child Protection Policy and procedures, especially new and part time staff
  - Be alert to the specific needs of children in need, those with special educational needs and young carers
  - Be able to keep detailed, accurate, secure written records of concerns and referrals
  - Obtain access to resources and attend any relevant or refresher training courses
  - Encourage a culture of listening to students and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them
- 
- **Raising awareness – the DSL should**
  - Ensure the College's policies are known and used appropriately
  - Ensure the College's Safeguarding/Child Protection Policy is reviewed annually; the procedures and implementation are updated and reviewed regularly, and work with our governing body regarding this
  - Carry out an annual review for the governing body to assist them in their proprietorial oversight
  - Ensure the Safeguarding/Child Protection Policy is available publicly and parents/guardians are aware that referrals about suspected abuse or neglect may be made and the role of the College in this
  - Link with Cambridge & Peterborough Partnership Safeguarding Board to make sure staff are aware of training opportunities and the latest local policies on Safeguarding
  - Where a student leaves the College ensure their Safeguarding/Child Protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt should be obtained.

### **Procedures (making a referral)**

Dealing with a disclosure from a child is likely to be a stressful experience. The member of staff concerned should consider seeking support for him or herself and discuss this with one of our designated DSLs.

If a member of staff has a concern that is in anyway related to safeguarding issues it should be reported to or discussed with one of the DSLs. If there are no safeguarding issues it should be discussed with the any other member of staff.

The member of staff must record information regarding the concern the same day. The record must

be clear, precise, factual account of the observations. The recording forms must be used. One of our designated DSLs will decide whether the concerns should be referred to Cambridge Children Social Care.

If one of the DSLs decides that a referral should be made to Children's Social Care, where a child has suffered or is at risk of suffering significant harm, it will be made immediately. Parents/Guardians will be notified if a referral is made unless that would put the child at greater risk.

Staff should differentiate between children who are in need of additional support from one or more agencies and children who have suffered or are at risk of suffering serious harm. Children who have suffered or are at risk of suffering serious harm must be reported to children's social care immediately. Children who are in need of additional support from one or more agencies need to use the CAF (Common Assessment Framework) and "Team Around Child" (TAC) approaches.

### **Dealing with a disclosure**

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

- listen carefully to what is being said without displaying shock or disbelief
- accept what is being said
- allow the student to talk freely
- reassure the student, but not make promises which they may not be able to keep
- never promise confidentiality, as it may be necessary to refer the information onwards
- reassure the student that what has happened is not their fault
- stress that it was the right thing to tell
- listen, rather than ask direct questions
- never ask leading questions; if possible avoid asking questions. Ask open questions if more information needed.
- not criticise the perpetrator
- explain what has to be done next and to whom this must be told

### **Record keeping**

When a student has made a disclosure, or when a concern is raised, the member of staff should:

- make brief factual notes as soon as possible after the conversation or observation
- attach the original notes to a 'Record of Concern' form in case they are needed by a court or other professional
- record the date, time, place, noticeable non-verbal behaviour and the student's own words
- indicate on the body map the position of any bruising or other injury; no intimate areas of the body will be examined
- record statements and observations, rather than interpretations or assumptions

**Allegations involving College staff** (all college staff, including supply staff and volunteers)

Please refer to the St Andrews Recruitment Policy for the full policy and procedures.

Checks will be undertaken on all adults working in the college to establish the suitability of a person to work with children corresponding to government guidance on safer recruitment and in accordance with the Independent School Standards Regulations. Records of these checks will be kept in accordance with Keeping Children Safe in Education, Safer Recruitment Part 3; each recruitment selection panel will have a 'Safer Recruitment' trained member.

All college staff should take care not to place themselves in a vulnerable position with a student, such as when giving one-to-one tuition. It is always advisable for interviews or work with individual students to be conducted with or in view of other adults.

All staff understand that they are employed in a position of trust and that inappropriate behaviour with or towards students is unacceptable. It is an offence for a person in a position of trust to have a sexual relationship with a child under 18, even if the relationship is consensual. This applies where the child is in full-time education and the person works in the same establishment even if s/he does not teach the child. This is in accordance with the Sexual Offences Act 2003.

If a student, or parent, makes a complaint of abuse against a member of staff, the person receiving the complaint must take it seriously and immediately inform the Principal. Any member of staff who has reason to suspect that a student may have been abused by another member of staff, supply staff or volunteer, either at college or elsewhere, must immediately inform the Principal. If the Principal is the subject of an allegation refer to the nominated Governor; the Principal should not be informed.

If an allegation is made against the Governor, it must be reported to the Principal. Allegations or concerns that meet the harm test should be addressed under part 4 of Keeping Children Safe in Education 2021. In all cases of serious harm or a crime being committed, the police should be notified from the outset. A record of the concerns must be made, including a note of anyone else who witnessed the incident or allegation.

The Principal will refer immediately and within 24 hours to the Local Authority Designated Officer/Team (LADO) at Cambridge Council

- Email: [LADO@cambridgeshire.gov.uk](mailto:LADO@cambridgeshire.gov.uk)
- Telephone: 01223 727 967 (Monday to Friday during office opening hours)
- Telephone: 01733 234 724 (Emergency Duty Team - out of hours queries)

The LADO provides advice and guidance to employers and voluntary organisations that have concerns about a person working or volunteering with children and young people who may have behaved inappropriately. If information has been received that may constitute an allegation the LADO will also preside over the investigation.

The Principal should not make his decision over what may appear to be a borderline case but should discuss any concerns with the LADO team. This may be done tentatively and

without giving names in the first instance. If it is decided that it is not necessary to refer the matter on the Principal will consider whether there needs to be an internal investigation.

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

Where a member of boarding staff is suspended pending an investigation of a Safeguarding/Child Protection nature, arrangements for alternative accommodation away from students will be made. Any person, whether employed, contracted, supply staff, a volunteer or student, who is no longer at the College because they are considered unsuitable to work with children, will be reported to the Disclosure and Barring Service (DBS) within one month of leaving the College. Furthermore, the College will notify the Teaching Regulation Agency of the details of any teacher who has been dismissed or left the College where there are concerns that a prohibition order may be appropriate.

Transferable risk from incidents arising outside of school where a member of staff has behaved or may have behaved in a way that indicates that the person may not be suitable to work with children (for example, involving domestic violence) should be considered by school leaders. All staff should be aware of their duty to raise concerns about the attitude and actions of colleagues. If necessary, they should consult with the LADO team.

### **Low Level Staff Concerns**

The safety and wellbeing of children in our college is dependent on the vigilance of all our staff and their prompt communication to the DSL or another member of the safeguarding team of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children. All references in this section to "adult" should be interpreted as meaning any adult (defined above) and any visitor, unless otherwise stated.

The college is conscious of its duty of care to students and will always act, including if alerted to the possibility of abuse arising from situations or persons outside the college setting. The notification and prompt handling of all concerns about adults is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation found to be substantiated.



## Staff Code of Conduct

All staff must behave responsibly and professionally in all dealings with children and specifically with students for whom they have a duty of care. All staff must follow the procedures set out in our 'Staff Code of Conduct including Acceptable Use Policy'. Staff should always avoid behaviour which might be misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care.

A relationship between a member of staff and a student cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence for a person aged 18 or over and in a position of trust to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. A position of trust could arise even if the member of staff does not teach the child.

## Our low-level concern policy

The overarching aim of the college's Low-Level Concern Policy is to facilitate a culture in which the clear values and expected behaviours which are set out in our Code of Conduct are lived, constantly monitored, and reinforced by all staff. In particular, the intention of this policy is to:

- maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines.
- ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Code of Conduct; and
- provide for responsive, sensitive, and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

## What is a low-level concern?

A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that an adult may have acted in a manner inconsistent with the college's Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour particularly towards or around children.

## Low-Level Concerns about self (self-reporting)

From time to time an individual may find him/herself in a situation which might appear compromising to others, or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct.

Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the college sees self-reporting of low-level concerns

as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

#### Low-Level Concerns about an adult

From time to time an individual may notice behaviour or actions in others which leave them concerned. These are behaviour or actions which fall short of a formal allegation of abuse. These tend to be behaviours which indicate that our Code of Conduct has not been met. Any such concerns can be dealt with as a Low-Level Concern.

#### What should I do if I have one?

Where a low-level concern exists, it should be reported to the DSL or another member of the safeguarding team as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (Where the concern relates to a particular incident).

#### How will my low-level concern be handled?

The DSL will discuss all low-level concerns s/he receives with the Principal as soon as possible and in any event within 24 hours of becoming aware of it. The Principal will, in the first instance, satisfy him/herself that it is a low-level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure outlined in the safeguarding policy.

The circumstances in which a low-level concern might be reclassified as an allegation are where:

- a) the threshold is met for an allegation
- b) there is a pattern of low-level concerns which collectively amount to an allegation or
- c) there is other information which when taken into account leads to an allegation.

Where the Principal is in any doubt whatsoever, advice will be sought from the Designated Officer (LADO), if necessary, on a no-names basis. Having established that the concern is low-level, the DSL or Principal as appropriate will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc.

#### What records will be kept?

Where a low-level concern has been communicated, a confidential record will be kept in a central file which logs all low-level concerns. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- a) the concern (or group of concerns) has been reclassified as an allegation as above; or
- b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability, or disciplinary procedure.

### **Procedures for dealing with peer-on-peer abuse**

The College seeks to promote an environment where students feel able to discuss their concerns with a member of staff. Situations involving student to student abuse will be taken very seriously, taking into account the needs of those involved under the guidance of the Designated Safeguarding Lead. Where a student is suspected of causing harm to another student the usual the Safeguarding procedures will be followed. These instances may include online activity and sexting, as well as sexual violence, sexual harassment (which can include sexual comments, remarks or jokes occurring in person or online and may be standalone or part of wider abuse), upskirting (which is now a criminal offence, the victim can be of any gender and typically involves taking a picture under someone's clothing, without them knowing, to view their genitals or buttocks for sexual gratification or to cause the victim harm or distress) and physical abuse. They should not be passed off as just a normal part of growing up or banter. It can also include specific gender issues, such as girls being sexually touched or assaulted by boys or initiation-type violence and humiliation (known as hazing).

It can also occur in intimate partner relationships between peers. A bullying incident should be treated as a safeguarding concern where there is 'reasonable cause to suspect a child is suffering, or likely to suffer, significant harm', for example through violent or sexually abusive behaviour. In these cases concerns should be reported to the local authority social care department and, in the case of a serious or criminal allegation, the police. All children involved would be offered support through tutors, the pastoral team and the DSLs, outside agencies and via independent counsellors where necessary.

With particular reference to sexting, whilst sharing photos and online content is part of daily life for young people, there are risks associated with the production and distribution of sexual images, not only relating to the law but also a young person's wellbeing, especially if the material is shared beyond their control. Staff should refer to the DSL any instances of sexting or suspicions of sexting.

The student concerned is likely to be very embarrassed and anxious about the consequences and the situation must be dealt with sensitively. Staff must not ask to view the image but confiscate the device on which the image is held and pass it on to the DSL who, in conjunction with the principal, will follow the guidance in 'Sexting in schools and colleges: responding to incidents and safeguarding young people'. Some but not all instances, according to this guidance, will need to be reported to the police and in cases where referral to outside agencies is not necessary, designated staff will work with the student to support and re-educate them.

In any event the sharing of sexual imagery of those under 18 by adults constitutes child sexual abuse and will therefore be referred to the police. The initial response to a report of sexual harassment or sexual violence from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should speak to the designated safeguarding lead (or a deputy). Victims should be offered full support and the designated safeguarding lead or deputy designated safeguarding lead will assess the matter on a case by case basis. This may include contacting social services, the police and managing the situation within the College setting.

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

### **Online safety and internet and computing use**

PHSE and Relationships and Sex Education lessons, as well as workshops from outside speakers, are used to teach students about being safe, in and outside College as well as online, to reduce risks and build resilience, as well as the safe use of electronic equipment. Students should also understand the risks posed by adults or young people, who may use social media to groom, bully, abuse or radicalise others.

The DfE has released guidance, Teaching online safety in schools June 2019, outlining how schools can ensure that students stay safe and behave online as part of the requirements of the curriculum. DfE resources can be found at [www.saferinternet.org.uk](http://www.saferinternet.org.uk) and [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk).

The College's Student Internet and Computing agreement outlines how the College ensures that students are able to use ICT, including the internet and related communication technologies, appropriately and safely. The College's policy on the prevention and management of bullying covers the issue of cyber bullying in some detail. The College's online safety policy gives information on filtering and information system security, as well as safe use of the internet and electronic devices.

### **Physical intervention/positive handling**

Staff may only use physical intervention as a last resort. We understand that physical intervention of a nature that causes injury or distress to a child may be considered under child protection or disciplinary procedures.

### **Anti-bullying**

Our policy on the prevention and management of bullying (Anti Bullying Policy) is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

### **Health and safety**

Our Health and Safety Policy, set out in a separate document, reflects the consideration we give to the protection of our students and staff both physically, within the college environment and when away from the school, for example when undertaking school trips and visits.

### **Safer recruitment**

The colleges recruitment policy sets the vetting requirements for all staff who wish to work in our school whether paid or voluntary.

### **Whistleblowing**

As stated in the Whistleblowing policy the College requires any member of staff to report to the Principal if they have any concern or worry in relation to practices taking place in College. Staff who report such issues are protected by the College from retribution or disciplinary action. The NSPCC whistleblowing helpline number is in the list below.

### **Governance of Safeguarding**

The company's Compliance Director on behalf of governors conducts a formal annual audit on safeguarding files, manages the DSL annual appraisal along with the college Principal and monitors and samples the SCR, staff recruitment and all safeguarding systems on a regular basis throughout the year. The Compliance Director meets on a regular basis throughout the year with the safeguarding team to discuss issues and to provide the team with support. The college Principal and DSL meets with Governors at least once a term to report formally on safeguarding issues and to give Governors a safeguarding compliance update as well as providing an annual report on safeguarding.

### **Staff Training**

- All staff annually will be asked to
  - Attend a safeguarding training session or attend an update session which will include Prevent, Peer-on-peer abuse and on-line safety.
  - Asked to re-sign the staff Code of Conduct
  - Read and sign that they have read the updated version of KCSIE part one and annex A.
  - Read and sign that they have read the updated college policy on safeguarding and all relevant policies (a list will be sent out annual by college for staff)
- New Staff on Induction will be asked to complete the following in addition to the above.
  - Basic safeguarding training and college policy with a member of the college safeguarding team
  - On-line safety for teaching staff
  - Role of DSL and how to raise a concern
  - Student behavior policy
  - Safeguarding response to a child missing from education
  - Sign and discussion about the Staff Code of Conduct
  - Whistleblowing policy
- College Safeguarding Team (DSL & DDSL) will also be expected to update their inter-agency working training every 2 years and ensure they receive regular updates on changes to procedures and policy both locally and nationally.

## External Safeguarding and Welfare Contacts

- Local Authority Designated Officer (LADO) team
  - 01223 727 967 (Monday to Friday during office opening hours)
  - 01733 234 724 (Emergency Duty Team - out of hours queries)
- Cambridge & Peterborough Safeguarding Partnership Board
  - Reporting a concern 0345 045 5203
  - Outside office hours, at weekends and on public holidays contact the emergency duty team on 01733 234724.
- Early Help Hub (EHH) Tel: 01480 376666
- Prevent Engagement Team [prevent@cambs.pnn.police.uk](mailto:prevent@cambs.pnn.police.uk) Tel: 01480 42 2596
- Education Safeguarding Team [ECPSGeneral@cambridgeshire.gov.uk](mailto:ECPSGeneral@cambridgeshire.gov.uk)
- Independent Schools Inspectorate 0207 600 0100
- Cambridgeshire Constabulary Non-emergency police number 101
- DfE helpline 0207 3407264
- Counter-extremism@education.gsi.gov.uk
- NSPCC Whistleblowing helpline 0800 028 0285
- Safeguarding Governor Tim Fish 0203 696 5300 or 07803 935385

## Pandemic safeguarding arrangements

In response to the 2020/21 COVID 19 pandemic schools were required to take measures to ensure the health and wellbeing of both children and staff. This included children spending significant amount of time at home and away from the school environment and to ensure there are arrangements for DSL cover throughout any period of remote learning and when students are resident out of normal term time due to COVID.

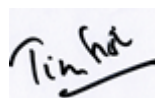
An addendum document to this policy was issued that applied to the whole provision of the college during the pandemic relating to Covid-19. This document will be reviewed and updated according to developments and advice from government and the local authority. Unless otherwise communicated, normal safeguarding and child protection policy and procedures continue to apply.

Signed by the Principal



Wayne Marshall 12/08/2021

Signed by the Named Governor for Safeguarding  
31/08/2021



Tim Fish