

Safeguarding and Child Protection Policy



Chair of Governors



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Introduction

This is the Safeguarding and Child Protection Policy of St Francis Xavier College.

This policy applies to the whole college and at all times including where students or staff are away from the college. This policy applies to core college activities and to out of hours and commercial activities.

The governors and staff of St Francis Xavier College fully recognise the responsibilities and duty placed upon them to have arrangements to safeguard and promote the welfare of all students at the college and others who come into contact with it. The college will always seek to support the needs of the individual students. The college recognise that all staff, including volunteers, have a full and active part to play in protecting students from harm.

This policy is designed to address the safeguarding duty to:

- provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff, supply staff and volunteers;
- set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly;
- have adequate safeguarding policies, procedures and measures to protect people;
- provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, and
- the specific obligations on the college to safeguard and promote the welfare of children, as defined below.

Safeguarding and promoting the welfare of children is defined as:

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

Safeguarding is safeguarding and promoting the welfare of children (as defined above) and promoting well-being and welfare by protecting the rights of children to live in safety, free from abuse and neglect.

At St Francis Xavier College we are committed to safeguarding children and young people and we expect everyone who works in our college to share this commitment. Adults in our college take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child.

Reference to **staff** includes all those who work for or on behalf of the college, regardless of their employment status, including contractors, supply staff, volunteers and governors unless otherwise indicated.

The college believes that it should provide a caring, positive, safe and stimulating environment in which students can learn and which promotes the social, physical, mental health and emotional wellbeing of each individual student, and which takes a child-centred approach.

The college recognises its responsibilities and duties to report child protection (CP) concerns to the social work service within Children's Services and to assist Children's Services in child protection enquiries and in supporting children in need. The college procedures are in line with those agreed by the Wandsworth Safeguarding Children's Partnership, the LA and the Secretary of State.

This policy is in line with the Children Act (1989), the Education (Independent College Standards (England) Regulations 2014, the Equality Act 2010, the Protection of Freedoms Act 2012, the Children and Social Work Act 2017; the Data Protection Act 2018 and General Data Protection Regulation and the guidance documents 'The London Child Protection Procedures' March 2017, [Working Together to Safeguard Children' July 2018](#), [Keeping Children Safe in Education 2022](#) 'Revised Prevent Duty Guidance for England and Wales' July 2015 and 'Multi-agency statutory guidance on female genital mutilation' April 2016.

Aims

- To actively promote and safeguard the welfare of students, staff and others who come into contact with the college.
- To raise awareness of all college staff of the need to safeguard all children and of their responsibilities in identifying and reporting possible cases of abuse.
- To emphasise the need for good communication between all members of staff in matters relating to safeguarding and child protection.
- To develop a structured procedure within the college which will be followed by all members of the college community in cases of suspected abuse.
- To provide a systematic means of monitoring students known or thought to be at risk of significant harm or where there are ongoing concerns.
- To work openly and in partnership with parents in relation to child protection concerns, where parents are not the cause of those concerns.
- To support all students' development in ways that will foster security, confidence and independence.
- To promote safe practice and challenge poor and unsafe practice.
- To further develop and promote effective working relationships with other agencies involved with safeguarding and promoting the welfare of children.
- To ensure that all vulnerable children, including those who need a social worker and those requiring mental health support are provided with appropriate help in college to ensure their needs are identified and responded to effectively
- To ensure that all adults working within the college have been checked as to their suitability to work with children, in line with current guidance.

- To integrate opportunities into the curriculum for children to develop the skills they need to recognise and stay safe from abuse.
- To take account of and inform policy in related areas, such as anti-bullying; e-safety; discipline and behaviour; health and safety; missing children; child sexual exploitation; sexual violence and harassment between children; FGM; so-called honour based violence; anti-radicalisation; positive handling and physical intervention procedures; procedures for dealing with allegations against staff and recruitment practice.

Key Principles

- The college believes that all children have a right to be protected from harm and/or abuse.
- The college will take reasonable steps to ensure that its students and others who come into contact with the college do not, as a result, come to harm or are exposed to abuse.
- The college recognises that abuse and neglect are complex issues and rarely standalone events and therefore require a culture of vigilance, professional curiosity and respectful challenge and effective recording and monitoring systems.
- The college recognises that abuse occurs in all cultures, religions and social classes and that staff need to be sensitive to the many differing factors which need to be taken into account depending on the child's cultural and social background when dealing with CP issues. However, the college also recognises that the needs of the child are paramount and any concerns will be referred on appropriately whatever the family background of the child concerned.
- The college recognises that because of the day to day contact with children college staff are extremely well placed to observe outward signs of abuse.
- The college recognises that a child who is abused or witnesses abuse or violence may find it difficult to develop and maintain a sense of self-worth, they may feel helpless and humiliated and may feel self-blame.
- The college recognises that it may provide the only stability in the lives of children who have been abused or are at risk of harm.
- The college accepts that research shows that the behaviour of a child in these circumstances may range from that which is perceived as normal to that which is overtly aggressive, disturbed or withdrawn.
- The college knows that it is important that children feel secure, are encouraged to talk and are sensitively listened to, and that children know that there are adults in college whom they can approach if they are worried or unhappy.
- The college acknowledges that (although all designated/key staff have the skills and experience to respond to a variety of situations and issues) there may be occasions where it will be appropriate to consider whether specific or additional arrangements need to be put in place where an issue is particularly sensitive due to gender issues or cultural or faith issues. This ensures that in cases of sexual abuse in particular, a student can be spoken to by a same sex member of staff (who has received enhanced training) if this is felt to be appropriate.
- The college adheres to the principles of working in partnership with those who hold parental responsibility for each child.

- The prime concern at all times must be the welfare and safety of the child. Where there is a conflict between the needs of the child and the parent/carer, the interests of the child must be paramount.
- All staff, supply staff and volunteers should feel able to raise concerns about poor or unsafe practice or potential failures in the college's safeguarding regime and know that these concerns will be taken seriously by the leadership team and dealt with sensitively and appropriately.
- All staff should only involve those who need to be involved when a child tells them he/she is being abused or neglected.

Contextual safeguarding

- Safeguarding incidents and / or behaviours can be associated with factors outside the college and / or can occur between children outside the college.
- All staff, including the DSL, should consider the context within which such incidents and / or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and / or welfare.
- Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse

Information Sharing and Multi-Agency Working

- **This guidance is included in Government guidance: Data protection: toolkit for colleges and the annual review checklist.**

Effective sharing of information between practitioners and local organisations and agencies is essential for early identification of need, assessment and service provision to keep children safe. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of students, which is always the college's paramount concern.

The college has developed effective links with relevant agencies and co-operates as required with their enquiries regarding child protection matters, including attendance at child protection case conferences wherever possible and providing reports as a matter of course. The college will contribute to multi – agency assessments of children's needs where appropriate and work in a fully integrated way with other relevant services as appropriate.

The college understands that the UK GDPR and Data Protection Act 2018 provide a framework to ensure that personal information is shared appropriately and is proportionate and relevant. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

All requests for information are dealt with by the designated safeguarding lead who will provide a response in line with the college's statutory obligations.

The college follows the DfE guidance 'Information Sharing: advice for practitioners providing safeguarding services'. While the college will share information with those involved where and when it is appropriate to do so to promote the welfare and protect the safety of children, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

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

- When students leave your college any CP / safeguarding information / records must be passed on to the receiving school / college (once confirmed) in a secure way and confirmation of receipt should be obtained.
- Safeguarding and CP information is regarded as personal information and you do not necessarily need consent to share this. Generally, families should be made aware that information will be shared with a new college, what will be shared, with whom and why. If it is not reasonable to do this, or by doing so a child or young person's safety could be put at risk information can be shared.
- Guidance as to whether copies of CP / safeguarding files should be retained in the originating school / college is not absolute, but local practice has been developed and it is recommended that colleges seek advice from the Local Authority (or their legal provider if relevant).
- In Wandsworth, therefore, we recommend that key CP / safeguarding records are copied and one copy is retained in the originating college. It is immaterial whether original is retained and copy sent or vice versa
- It is fine to retain either paper or electronic records so if there is shortage of filing space records can be scanned and retained electronically – some colleges have chosen to do this – however if there are **original signed notes relating to a serious disclosure** it is advisable to retain the paper copy as these could be required
- The computer systems that are on the market have facilities to transfer the data to other colleges. At the time of writing, this does not mean that the data is transferred, it simply means that the previous college relinquish access, and access rights are transferred to the new college; the data is kept intact.
- Records should be retained long term, until the child is 25 years of age or older, then reviewed. IRMS guidance states that records should be retained for a longer period in 'instances where detailed information about activities in college may form an important part of safeguarding for that individual'.
- In addition, since the Independent Inquiry into Child Sexual Abuse (IICSA) was established, organisations should not destroy any records that might be relevant. Since we may not know at the time which records may be relevant, this provides justification for retention. Judicial review also supports this stance.
- The college should update their data audit log to reflect their retention period for these records

Operation Encompass (formerly Project Tearose) is an information sharing agreement between the Metropolitan Police and Wandsworth Borough Colleges. St Francis Xavier College has signed up to this agreement.

If police have responded to a domestic incident and there are children in the family, the officers working on Operation Encompass (formerly Project Tearose) will disclose this incident to the college the following morning (Monday to Friday). The actual content of the information shared is kept to the minimum, i.e. outlining the offence, but without specific details.

The information is shared securely with the designated safeguarding leads, and is treated as sensitive and confidential.

Research shows that children who are involved or who have witnessed domestic abuse are more at risk of emotional harm and potentially physical harm. The information is shared in order to ensure the safety and wellbeing of the child, and so that support can be offered to the child if necessary. The college is part of the network available to support the family and child.

Teaching students about safeguarding

The college pays particular attention to its practices, in particular through the **tutorial and Religion & Philosophy** programme, to help children adjust their behaviours in order to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help. In particular, there are sessions on relationships and sex education which include amongst other things sexting, porn, child sexual exploitation and sexual bullying as well as sessions on e-safety, where children are taught to keep themselves safe on-line and understand the student acceptable use policy. The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of tutorial activities.

Regarding the latter, the college is aware of the importance of placing appropriate monitoring systems and filters and that these should not lead to unreasonable restrictions as to what young people can be taught with regard to online teaching and safeguarding.

Additionally, tutors work with their charges on developing resilience to the challenges the latter will encounter in life, including mental health problems or the possibility of radicalisation.

Students are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through tutorial / Religion and Philosophy appropriate to their age and stage of development.

Students are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how any report will be handled.

The college also provides wellbeing groups and all-girl groups where students are encouraged to speak with pastoral staff and help guide policy on gender equality and mutual respect. Student voice is sought through a range of **platforms including questionnaires, focus groups and the student union**.

At the start of each year, all students receive a presentation outlining how students can report concerns and what happens when they do. Heads of House and tutors follow this up at the start of each term reminding students of how they can report concerns.

Reporting concerns

Students are able to report any concerns directly to staff in person or by email. Posters are displayed in each classroom and communal area with contact details of college staff and external organisations.

Communication with parents/carers

The college ensures that all parents are informed that it has a child protection/safeguarding policy and is required to follow WSCP guidelines in respect of reporting suspected abuse to Children's Social Care. The Safeguarding and Children Protection Policy is published to the college website.

Parents will be made aware of how the college's safeguarding system works and with whom they can discuss any concerns. Information will also be made available about any local and national telephone helplines.

In individual cases, parents will be notified of the colleges' concerns at the earliest appropriate opportunity.

Although decisions to seek support for a child in need would normally be taken in consultation with parents and students, their consent is not required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm. There may be circumstances when the DSL will need to consult the headmaster, the LADO, children's social care, the police and / or the student before discussing details with parents.

Children with special educational needs, disabilities or certain health conditions

The college recognises that children with SEN and disabilities or certain health conditions can face additional safeguarding challenges. The college understands that additional barriers can exist when recognising abuse and neglect in this group of children and provides additional pastoral support where needed. These can include:

- 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 or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges to identify whether action under this policy is needed.

The designated safeguarding lead will work with the Learning Support department, where necessary, to ensure that the needs of SEN and disabilities students in relation to child protection issues are responded to appropriately (e.g. for a child with particular communication needs).

Private Fostering

Schools / colleges have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although colleges have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the college. However, it should be clear to the college who has parental responsibility.

College staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved

to check that they are aware of their duty to inform the LA. The college itself has a duty to inform the local authority of the private fostering arrangements.

Online safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a college to protect and educate the whole college community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.

Reviewing online safety: Technology, and risks and harms related to it evolve and changes rapidly. Schools and colleges should consider carrying out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face. A free online safety self-review tool for colleges can be found via the 360 safe website.

UKCIS has published Online safety in schools and colleges: Questions from the governing board. The questions can be used to gain a basic understanding of the current approach to keeping children safe online; learn how to improve this approach where appropriate; and find out about tools which can be used to improve the approach. It has also published an **Online Safety Audit Tool** which helps mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring.

When reviewing online safety provision, the UKCIS external visitor's guidance highlights a range of resources which can support educational settings to develop a whole college approach towards online safety. There is a wealth of additional information available to support schools, colleges and parents to keep children safe online.

As schools and colleges increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. To safeguard students, the college has appropriate filters and monitoring systems in place, whilst still allowing students to be taught about safeguarding and online safety. Refer to the college's IT Student Acceptable Use Policy and E-Safety Policy for further information. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- **contact:** being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. Report to the Anti-Phishing Working group: <https://apwg.org/>

Additional information about how to keep students safe online is available in Annex D of KCSIE.

Wellbeing and mental health

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

In order to help students succeed, the college recognises that it plays an important role in supporting them to be resilient and mentally healthy. Some children are more at risk of developing mental health problems than others and these risks can relate to the child, their family or to community and life events. Risk factors are cumulative, and children exposed to multiple risks are more likely to develop behavioural or mental health problems. All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe 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 staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated safeguarding lead or a deputy.

Students will be given the opportunity to self-refer to the college counselling services (the college counsellor or the chaplain). Where severe problems occur the college will ensure that appropriate referrals are made (with consent) to specialist services (e.g. CAMHS). The college will ensure that students and their families are enabled to participate as fully as possible in decisions and are provided with information and support.

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.

Role of the Designated Safeguarding Lead (DSL)

The governing body ensures that an appropriate senior member of staff of the college's leadership team is appointed to the role of designated safeguarding lead. At St Francis Xavier College this is the Associate Principal Ethos. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety) throughout the college. This should be explicit in the role holder's job description.

This person should have the appropriate status and authority within the college to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

The DSL is supported by a team of deputy designated safeguarding leads. Deputies are trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

During term time the designated safeguarding lead (or deputy) is available (during college hours) for staff in the college to discuss any safeguarding concerns. In the event of an emergency out-of-hours

or during the holidays, a member of the safeguarding team can be contacted via email. When it is not possible to meet in person, staff can contact them by phone or email.

Training, knowledge and skills: The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. **This training should be updated at least every two years.**

The designated safeguarding lead should undertake Prevent awareness training>
<https://www.elearning.prevent.homeoffice.gov.uk/>

Training should provide designated safeguarding leads with

- a good understanding of their own role,
- how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care,

so they:

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

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them.
- Volunteers will receive appropriate training, if applicable.

In addition to the training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role. Wandsworth Local Authority will use Twilight Training events to provide additional training to DSL's / DDSL

All training courses are promoted on **Wandsworth Local Authority TPD website** and where courses may not be accessible / available; it is the college's responsibility to ensure staff are fully trained with reasonable timescales

Staff can be upskilled via:

- Virtually / Online Training
- E-Bulletins
- Updates / Briefings can be sent via Emails including Recorded Training

Any members of staff attending TPD courses are expected to:

- 1: Create their own account: <https://www.tpd.org.uk/cpd/portal.asp>
- 2: Attend on Time (late arrival may result in missing registration)
- 3: Complete any pre / post course evaluations
- 4: Certificate of attendance will be issued upon confirmation of registration and Point 3
- 5: Access to Certificates is acquired by :
 - Please log on to TPD online
 - Click "MY PROFILE AND BOOKING"
 - Go to "EVENTS" and then "Events attended"
- 6: All queries regarding TPD must be signposted to TPD

DSL must liaise with the principal to inform him of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.

In accordance with Annex C of KCSIE, key responsibilities of the DSL include:

Managing referrals

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;

- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Working with others

- act as a source of support, advice and expertise for all staff;
- act as a point of contact with the three safeguarding partners
- liaise with the Principal to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the “case manager” (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially teachers, pastoral support staff, college nurses, IT Technicians, senior mental health leaders and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that the children’s needs are considered holistically;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the Principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing or have experienced
- be aware of students who have a social worker

Raising awareness

- ensure the college’s child protection policies are known, understood and used appropriately;
- ensure the college’s child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing body regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the college in this; and
- link with the local WSCP to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and college leadership staff. Their role could include ensuring that the college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Training

The designated safeguarding lead and deputies will be released to attend the necessary enhanced training courses to enable them to carry out their role effectively.

The DSL and deputies should undergo training at an appropriate level to provide them with the knowledge and skills to carry out the role. The deputy DSLs should be trained to the same standards as the DSL. This training should be updated every two years. They must also attend Prevent training.

Their knowledge and skills must be refreshed at regular intervals and at least annually to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- 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 child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- understand the importance of information sharing, both within the college, and with the WSCP, other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them.

Specific safeguarding issues

Up-to-date guidance and practical support on specific safeguarding issues will be sought where necessary.

The DSL and deputies will attend relevant training and ensure that staff are aware of issues such as child sexual exploitation, harmful sexual behaviours, child on child abuse, female genital mutilation,

illness fabricated and induced, domestic abuse and honour based abuse, understand the indicators and recognise the complexities of these issues for young people. All young people should have a safe space to speak out and share their concerns with members of staff eg the college operates a safe space for our LGBTQI young people. We have systems in place for young people to express their views and give feedback about the measures in place to keep them safe.

Child Protection file

Where children leave the college the DSL ensures their 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.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

On receiving a child protection file, the DSL will ensure that key staff are aware as required, including the SENCo.

Child protection plans

Where a student at the college has a child protection plan, the college will ensure that:

- The child's social worker is notified of any student subject to a child protection plan who is absent from college without explanation for more than 2 days.
- Any new concern or relevant information about a child subject to a child protection plan will be passed to the child's allocated social worker without delay.
- If a child subject to a child protection plan leaves the college, records will be transferred to the new school or college without delay and the child's social worker informed of the change.

Recordkeeping

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The records created in accordance with this policy may contain personal data. The college has a number of privacy notices which explain how the college will use personal data for the benefit of students and parents. In addition, staff must ensure that they follow the college's data protection policies and procedures when handling personal data created in connection with this policy.

The DSL ensures there is an effective recording system for safeguarding matters, which is kept securely and confidentially with access restricted to those members of staff who have a lead role. Incidents of bullying, sexual harassment and violence are logged and reviewed for behavioural trends.

Safeguarding concerns are recorded on Dashboard. This system is available to all staff (with access restrictions put in place where required). Any action taken and decision making rationale is recorded centrally in Pastoral Log

Child protection concerns are recorded in the sensitive area of the Pastoral Log. Only the DSL and deputies, CMDC, welfare and HOH are able to enter concerns, view and add updates to concerns stored.

All records created in accordance with this policy are managed in accordance with the college's policies that apply to the retention and destruction of records.

Governing body responsibilities

- The governors will ensure that they comply with their duties under legislation. They will ensure that the policies, procedures and training in the college are effective and comply with the law at all times and take into account the procedures and practice of the WSCP.
- The governors will ensure that a member of the governing body (usually the chair) has been nominated to liaise with the local authority (LA) and/or partner agencies on issues of child protection and in the event of an allegation of abuse being made against the Principal. The governors will remedy any deficiencies or weaknesses in regard to child protection arrangements that are brought to its attention without delay.
- The governors will ensure that children are taught about safeguarding, including online safety. College will consider this as part of providing a broad and balanced curriculum.

Staff (and volunteer) responsibilities

All staff have a duty to:

- report any concerns they may have about the safety and/or wellbeing of students;
- report any concerns they may have about the safety and/or wellbeing of other persons associated with the college;
- report any safeguarding concerns about staff or anyone else associated with the college.

College staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.

All staff have a responsibility to provide a safe environment in which children can learn. The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

All staff are required to read this policy carefully and to be aware of their role in these processes.

- Staff working with children are advised to maintain an attitude of '**it could happen here**' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.
- Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they should always speak to the designated safeguarding lead (or deputy).
- All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Indicators of abuse and neglect, are described in Appendix 2.
- Any staff member who has a safeguarding concern should follow the reporting and referral processes set out below. Staff should expect to support social workers and other agencies following any referral.
- Where a staff member has concerns about poor or unsafe practice or potential failures in the college's safeguarding regime, these concerns will be taken seriously by the leadership team and dealt with sensitively and appropriately. Staff may follow the college's Whistleblowing Policy or if they do not feel able to raise an issue with the college can contact the NSPCC whistleblowing helpline. Contact details are available at the beginning of this policy.

- All staff should understand the college's role and responsibilities within the local partnership. Refer to Information Sharing and Multi-Agency Working section for further information.

Training

All staff will receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff receive safeguarding and child protection updates (via email and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All staff including the Principal will receive a copy of this policy. All college senior staff and staff who work directly with children will also be provided with Part one of KCSIE, and will be required to confirm that they have read and understand these. Annex A can be provided (instead of Part one) to those staff who do not directly work with children, if the governing body or proprietor think it will provide a better basis for those staff to promote the welfare and safeguard children.

Staff development training will also include training on online safety and Prevent duty training assessed as appropriate for them by the college. Staff also receive training on how to manage a report of child-on-child sexual violence and sexual harassment. Staff should also refer to the college's Code of Conduct about how to interact with students safely in one-to-one scenarios.

The college recognises that there is a variety of expertise within the staff team and will provide opportunities for staff to contribute to and shape safeguarding arrangements and policy. Additionally, the college will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, harmful sexual behaviour, child sexual exploitation, female genital mutilation, cyberbullying and mental health.

The college has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant knowledge, skills and experience to safeguard children effectively, including questionnaires, staff meetings, and professional development reviews. This includes information on how staff can report concerns occurring out of hours/out of term time.

All governors receive safeguarding training on induction. The chair of governors will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities.

All staff should be aware of systems within their college which support safeguarding and these are explained to them by members of the safeguarding team as part of staff induction. This will include:

- the child protection policy;
- the student code of conduct;
- the staff code of conduct (including rules/guidance on social media and IT acceptable use, interacting safely with students in specific situations and staff / student relationships);
- the college's whistleblowing policy
- the children missing from education;
- the college's approach to online safety;
- safeguarding training in accordance with the WSCP procedures including guidance on managing a report of peer on peer harmful sexual behaviour;
- appropriate Prevent duty training; and

- the role, identity and contact details of the designated safeguarding lead (including the identity of any deputies).

Copies of policies and a copy of Part one of Keeping Children Safe in Education are provided to staff at induction.

All staff must be aware of their local early help process and understand their role in it and be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. Refer to the referral process below and *Working Together to Safeguard Children* July 2018 for further information. When considering referrals to support agencies the college will act in accordance with WSCP Thresholds for Intervention guidance, which is consistent with the London-wide Continuum of Need

>
https://wscp.org.uk/media/1252/wscp_thresholds_for_intervention.pdf#:~:text=Wandsworth%E2%80%99s%20Thresholds%20for%20Intervention%20is%20an%20overarching%20document,to%20collactively%20achieve%20good%20outcomes%20for%20the%20child.

All staff must be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments. Refer to the referral process below and *Working Together to Safeguard Children* July 2018 for further information.

All staff must know what to do if a child tells them he/she is being abused or neglected. Staff must know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.

Support for staff

The college recognises that staff working in the college who have been dealing with child protection issues may find the situation stressful or upsetting. The college will:

- ensure that opportunities are provided for staff to be supported in these circumstances and to talk through any anxieties they may have, including telephone and face-to-face counselling.
- consider what arrangements can be made to provide supervision for designated leads and any other staff members as appropriate

Staff member responsible for looked after children

The college recognises that Looked After Children (LAC) and previously LAC are potentially vulnerable and will work together with other agencies including social workers and the virtual college head in the authority. When the need arises, the college will ensure there is a designated teacher whose role is to promote the educational achievement of children who are looked after, and that the identified person has received appropriate training.

The college will ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her, as well as the

details of the child's social worker. The college will work to support the progress of looked after children.

Positive handling and physical intervention

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom.

Safer recruitment

The college is committed to practising safer recruitment in checking the suitability of staff (including staff employed by another organisation).

The governing body should prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised. The college maintains a single central register of appointments for all staff. The college's Recruitment Policy outlines the recruitment process and all checks carried out on staff working at the college. The college follows the safer recruitment processes, including, as appropriate relevant sections in part 3 of Keeping Children Safe in Education 2022.

Risk assessment

Where a concern about a student's welfare is identified, the risks to that student's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

The format of risk assessment may vary and may be included as part of the college's overall response to a welfare issue, including the use of individual student welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the college's approach to promoting student welfare will be systematic and student focused.

The Principal has overall responsibility for ensuring that matters which affect student welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.

Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

Monitoring and review

The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the safeguarding governor as necessary and seeking contributions from staff. The DSL will update the senior leadership team regularly on the operation of the college's safeguarding arrangements.

Any safeguarding incidents at the college will be followed by a review of these procedures by the DSL and a report made to the governors. Where an incident involves a member of staff, the LADO will be asked to assist in this review to determine whether any improvements can be made to the college's

procedures. Any deficiencies or weaknesses in regard to safeguarding arrangements at any time will be remedied without delay.

The governors will undertake an annual review of this policy and the college's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working.

The DSL will work with the nominated safeguarding governor, preparing a written report commissioned by the board of governors. The written report should address how the college ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the college and how these have been handled; and the contribution the college is making to multi-agency working in individual cases or local discussions on safeguarding matters.

The governors will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy its final approval. Detailed minutes recording the review by the governors will be made.

PROCEDURES

What to do if staff have a concern about a student

The college procedures are in line with those agreed by the Wandsworth Safeguarding Children Partnership, the LA and the Secretary of State.

All staff members have a statutory responsibility to safeguard and promote the welfare of all students at all times.

Reporting a concern

If a staff member has a concern about a student or receives information that leads them to be concerned that a student has been harmed or is at risk of harm or their welfare is being compromised, they are required to act appropriately and immediately to ensure action can be taken to protect the student concerned.

The member of staff must report the concern to the DSL or the DDSL in the DSL's absence.

If the concern involves an allegation against staff, this must be reported in accordance with the procedures set out below.

Teachers must report known cases of female genital mutilation (FGM) to the police. See Appendix 1 for further information about FGM and this reporting duty. All other staff should refer FGM concerns to the DSL.

Guidance on receiving a disclosure

The concern may be as a result of a disclosure from a student, a parent or a third party or may arise due to behaviour that has caused the staff member to become concerned.

When listening to a child, staff must:

- Listen carefully to what the student is telling them without interrupting
- Ideally listen to the child first and then make notes
- Not promise confidentiality
- Remain non-judgemental and keep an open mind

- Not ask leading questions, or more questions than needed – just establish what the student is telling them
- Be honest with the student and explain what will happen next
- Keep a sufficient written record of the conversation. All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.

Staff should be able to reassure victims 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 abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

When receiving a report of harmful sexual behaviour, staff must follow the guidance provided in Part 5 KCSIE. This includes:

- Only record the facts as the child presents them.
- Where the report includes an online element, do not view or forward illegal images of a child. See Appendix 1 and the UK Council for Child Internet Safety's advice [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(DfE and UK Council for Internet Safety, December 2020\)](#) for advice when viewing an image is unavoidable. Where the report includes peer-on-peer abuse, staff should refer to Appendix 2 of this policy, as well as the following guidance:
- Farrer & Co Addressing child on child abuse 2022
 - o Lucy Faithfull Foundation [Harmful Sexual Behaviour Toolkit](#) (2020)
- Manage reports with another member of staff present (preferably the DSL or DDSL), if possible.
- Inform the DSL as soon as practically possible if the DSL is not involved in the initial report.

When reporting a concern, staff must:

- Record the information fully - preferably on the Pastoral Log
- If accessing the form is not possible, staff must not delay in informing the DSL or deputy DSLs.
- Note the facts in the child's own words.
- Pass the information personally or via email (marked confidential) to the DSL or deputies immediately.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care at Wandsworth's Multi-Agency Safeguarding Hub (MASH) or relevant borough (and if appropriate the police) is made immediately.

Asking for advice

Staff should remember the DSL is available to offer help, advice and guidance to staff and students where necessary. If staff have a concern or problem and are unclear how to proceed, they should ask for advice.

If the college is unsure how to proceed with a child protection situation, or require advice, this will be sought via the Safeguarding in Education Officer, a duty manager at MASH or directly from the Safeguarding Standards Service.

What if the DSL is unavailable?

During term time the designated safeguarding lead (or deputy) is available (during college hours) for staff in the college to discuss any safeguarding concerns. In the event of an emergency out-of-hours or during the holidays, a member of the safeguarding team can be contacted by email.

If a member of staff is unable to locate or contact the DSL, deputies or Principal, they must not delay taking action. Staff should speak to their line manager or a member of the senior leadership team and / or advice should be taken from children's social care. The contact details are set out in Appendix 1.

Where a child is suffering, or is likely to suffer from harm, a referral to children's social care should be made immediately. Staff should be aware of the process for making referrals direct to MASH (or the police) themselves. Staff must inform the DSL or deputies, or a member of the senior leadership team, as soon as possible when they make a referral directly. All contact details are at the front of this policy.

In all other instances concerns should be passed on to the DSL as soon as possible – do not delay.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

Action by the DSL

On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the Wandsworth Safeguarding Children Partnership procedures and referral threshold document. Such action may include:

- managing any support for the student internally via the college's own pastoral support processes, seeking advice from children's social care where required (see below); • a multi-agency referral form (see below); or
- a referral for statutory services (see below).

The views of the child will be taken into account when considering the appropriate course of action but will not be determinative.

Where the concern relates to the welfare of a student who is aged 18 or over, the DSL will consider whether it is necessary to refer such concerns to the Safeguarding Adults Board rather than, or in addition to, children's social care.

If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the student's situation does not appear to be improving.

Supporting a student at college

If the DSL and deputies feel a child can be supported appropriately through internal college pastoral processes, these will be put in place to support and monitor the welfare of the child. Where required, the DSL will seek advice from external agencies.

Support is provided by the form tutor and also Head of House and a student may be referred to the college's counselling services.

Early intervention and help

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

All staff recognise that when a child or family may be experiencing difficulties, support is most effective if it is provided at as early a stage as possible. This involves identifying emerging problems; liaising with the designated safeguarding lead or other relevant colleagues; sharing information with other professionals to support early identification and acting as lead professional in undertaking a multi-agency referral form (MARF) (previously early help assessment (EHA)).

- Any concerns will be identified by staff, discussed with relevant colleagues and parents and support put in place. Effective monitoring systems will be used to assess the effectiveness of interventions and outcomes.
- If appropriate support is not available within college's own resources, a multi-agency referral form will be completed to identify the child's needs and enable additional support to be sought from other agencies.
- A Team Around the Child will be established where appropriate and a Lead Professional identified.
- if early help is in place the situation will be kept under constant review and consideration given to additional referrals (e.g. to social care) if the child's situation does not appear to be improving.
- Multi-agency referral forms will follow the Signs of Safety and Wellbeing model and in line with WSCP guidance such as adhering to the Wandsworth Threshold Document

Staff are aware of the potential need for early help where a student:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- has a mental health need
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- 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;
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- is misusing drugs or alcohol themselves;
- is looked after or has returned home to their family from care;

- is a privately fostered child.
- Is at risk of honour based abuse such as FGM or forced marriage
- Is persistently absent from education, including persistent absences for part of the college day

If early help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in a multi-agency referral form, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

Making a referral

Where a child is suffering, or is likely to suffer from harm, a referral to children's social care (and if appropriate the police) should be made immediately. The contact details for children's social care are set out in Appendix 1.

Statutory assessments:

Children's social care may undertake a statutory assessment under the Children Act 1989 into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:

Children in need: A child in need is 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. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm: Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

Where incidents and/ or behaviours are associated with factors outside the college, the college will consider contextual safeguarding and whether wider environmental factors are present in a child's life that are a threat to their safety and wellbeing. The college will provide as much information as possible during the referral process.

Staff required to make a referral directly will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:

- personal details of the child including the child's developmental needs;
- detailed information about the concern;
- information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.

If the referral is made by telephone, this should be followed up in writing. If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

Once a referral is made, if a response is not received within one working day, the DSL (or person making the referral) will contact MASH to follow up. If a child's situation does not appear to be improving, the college will take responsibility for finding out what is happening and keep pressing for action to be taken, following the local escalation procedures.

The flowchart on the next page outlines the referral process.

When making referrals to support agencies the college will act in accordance with WSCP Thresholds for Intervention guidance, which is consistent with the London-wide Continuum of Need thresholds.

Search and confiscation

The DSL is aware of the role of the appropriate adult. The DSL must liaise with the principal to inform him of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#).

Referral flowchart

Actions where there are concerns about a child



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

² Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

³ Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

⁴ Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

⁵ This could include applying for an Emergency Protection Order (EPO).

What to do if staff have a concern about someone else's welfare

Staff who have concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy, should report them.

In the absence of an express procedure about reporting, they should report such concerns to their line manager in the first instance.

Allegations against staff

This part of the guidance relates to members of staff, supply staff and volunteers who are currently working in the college regardless of whether the college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

The college recognises that there will be occasions when a student at the college, or a parent or another person may make an allegation against a member of staff.

Concerns and allegations that may meet the harms test will be addressed as set out in Section one of Part four of KCSIE. 'Lower level' concerns and allegations that do not meet the harms test will be addressed as set out in Section two of Part four of KCSIE.

Allegations that may meet the harms threshold:

The term allegation refers to concerns reported or raised that might indicate a person has caused harm to a child, acted in a way that created potential serious risk to a child or would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity. This means it has been alleged that a teacher or member of staff (including supply staff and volunteers) in a school or college that provides education for children under 18 years of age has:

- behaved in a way that has, or may have, harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

When the allegation meets the criteria above:

- inform the Principal immediately where an allegation is made about any member of staff (other than the Principal including the DSL). The Principal would inform the LADO immediately of such an allegation.
- where the allegation is about the Principal, inform the chair of governors immediately without first informing the Principal. The chair would immediately inform the LADO of such an allegation.
- follow Wandsworth Procedures for Managing Allegations against Staff. This will always involve a discussion with LA officers and a referral to the Local Authority Designated Officer (LADO).
- Referrals to the LADO must be made via the MASH

If it is not possible to report to the Principal or chair of governors, a report should be made immediately to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the Principal or, where appropriate, the chair of governors.

All such allegations must be dealt with as a priority without delay. > [LADO \(Local Authority Designated Officer\) | THRIVE Wandsworth](#)

Low level concerns

The college uses a system of neutral notifications to log all low level-concerns. Staff are required to self-report in any situation where they feel their behaviour towards a student or another young person could be misinterpreted or misconstrued or leave them vulnerable.

Staff are also required to report any behaviour by an adult towards a student or another child that may have concerned them.

All neutral notifications are reviewed by the Head of HR and DSL and acted upon where there is a concern over the behaviour. By having a formalised method of reporting low-level concerns, it allows for the identification of patterns of behaviour that might be concerning and allows staff to reflect and self-report on their behaviour, as a means to strengthen the culture of safeguarding within the college.

A 'low-level' concern is any concern - no matter how small, and even if no more than causing a sense of unease or 'nagging doubt' - that an adult working in the college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours 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.

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

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

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

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- details of the concern
- context in which the concern arose
- action taken

Records must be kept confidential, held securely and comply with data protection legislation

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within the college that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

Refer to college's process for responding to allegations about staff and Appendix 9 for the neutral notifications form.

Supply teachers

In some circumstances the college may have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (referred to in this section as 'the agency').

Whilst the college is not the employer of supply teachers, it will ensure allegations are dealt with properly. In no circumstances will the college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The governing body will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the college, whilst they carry out their investigation.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The college will usually take the lead because agencies do not have direct access to children or other college staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the college, are under the supervision, direction and control of the governing body when working in the college. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the college during the investigation.

When using an agency, colleges will inform the agency of its process for managing allegations. This will include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Appendix 1 Important contacts

Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. All professionals should ensure that their approach is child centred: this means considering at all times what is in the best interests of the child.

Staff members must raise any safeguarding concerns with the designated safeguarding lead or deputies without delay. Concerns must be logged with the safeguarding team.

Designated Safeguarding Lead		
Ciaran Graham	c.graham@sfx.ac.uk	
Deputy Designated Safeguarding Leads		
Kier Hull	k.hull@sfx.ac.uk	
Jennifer Sykes Welfare Officer	j.sykes@sfx.ac.uk	
Kaira Eyangho (maternity cover)	k.eyangho@sfx.ac.uk	
Jessica Hardy	j.hardy@sfx.ac.uk	
Principal		
Graham Thompson	g.thompson@sfx.ac.uk	

If the designated safeguarding lead or deputies are not available, staff should not delay in taking appropriate action. Staff should consider talking to the **Principal** and / or taking advice from the college's local children's social care at MASH. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as practically possible.

Where a child is suffering, or is likely to suffer from harm, make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or in immediate danger. You should inform the DSL of any child at significant risk of harm in order for a referral to be made, however there may be occasions where an immediate referral to the Police / Local Authority is required. **Anyone can make a referral.** If you have made a referral prior to discussing this with the DSL you must tell the DSL (as soon as possible if you make a referral directly).

Staff members should ensure they are prepared for the referral with clear details of their concern and the child's name, DoB, address and contact details for parents/carers. Consent / agreement is not required for child protection referrals; however you, as the referring professional, would need to, where possible, discuss with and inform parents/carers that you are contacting MASH or making a child protection referral as stated above, unless by alerting them you could be putting that child or others at risk.

MASH		
Weekdays 9am – 5pm		mash@wandsworth.gov.uk 020 8871 6622
Out of hours		020 8871 6000
Multi-Agency Referral (MARF)	Form	https://wandsworth-self.achieveservice.com/service/Make a Referral to the Wandsworth MASH

Please note: The student concerned may not live in the Borough of Wandsworth. Please use the appropriate referral details for the borough in question.

The college works closely with Wandsworth Safeguarding Children Partnership to ensure concerns about a child are dealt with in accordance with locally agreed inter-agency procedures.

WSCP: Wandsworth Safeguarding Children Partnership (WSCP) was launched on 12 July 2019, jointly led by the: Police, CCG, The Local Authority (LA)

The WSCP (Police, Clinical Commissioning Group and the Local Authority), are responsible for protecting children and young people in Wandsworth from harm, abuse, neglect and exploitation, and promoting their welfare. The Wandsworth Safeguarding Children Partnership works to keep children safe, protect and promote their welfare across the Wandsworth area.

The 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017) and Working Together to Safeguard Children 2018. They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs

This policy is in line with the London Child Protection Procedures, Working Together to Safeguard Children 2018, local guidance from the Wandsworth Safeguarding Children Partnership and Keeping Children Safe in Education September 2022.

Important external contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Wandsworth Safeguarding Children Partnership	www.wscp.org.uk	wscp@richmondandwandsworth.gov.uk 020 8871 7401
Referral and Assessment Team	MASH : Multi Agency Safeguarding Hub Out of hours duty service (after 5:00pm)	Mash@wandsworth.gov.uk 020 8871 6622 020 8871 6000
Head of MASH and Referral & Assessment Services	Teresa Hills	Teresa.Hills@richmondandwandsworth.gov.uk
Head of Service Safeguarding Standards Childrens Services	Ruth Lacey	Ruth.Lacey@richmondandwandsworth.gov.uk
Safeguarding Children Manager	Lisa Tingle	Lisa.Tingle@richmondandwandsworth.gov.uk
LADO: Local Authority Designated Officer	Anita Gibbons	Anita.Gibbons@richmondandwandsworth.gov.uk 07 974 58 6461 Interim: Alice Peatling alice.peatling@richmondandwandsworth.gov.uk

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Education Safeguarding Officer	Andrea During	andrea.during@richmondandwandsworth.gov.uk 07814 934 125
Early Education and Childcare Places Service Lead	Matt Hutt	Matt.Hutt@richmondandwandsworth.gov.uk 0208 871 8820
Outreach & Provider Support Lead-Early Education	Liz Hickson	Liz.Hickson@richmondandwandsworth.gov.uk 020 8871 6223
Social Workers in Colleges - Team Manager (Pilot Programme)	Joanne Loveless	Joanne.Loveless@richmondandwandsworth.gov.uk
Thrive		thrivewandsworth@richmondandwandsworth.gov.uk
Virtual College Education Co-ordinator	Rachel Wright	Rachel.Wright@richmondandwandsworth.gov.uk
Police Sergeant: Safer Colleges Officer	Amreek Singh	Amreek.Singh@met.police.uk 07 788 36 0196
Safer Colleges Officer	PC Sam Gayler	Samuel.Gayler@met.police.uk
Police		999 for emergencies and 101 for non-emergencies
Crimestoppers free phone		0800 555 111[information may be passed anonymously]

ROLE/ORGANISATION	NAME	CONTACT DETAILS
College Improvement Manager	Ann Debono	Ann.Debono@richmondandwandsworth.gov.uk
Head of College Support Services and Traded Service	Gary Hipple	Gary.Hipple@richmondandwandsworth.gov.uk
College Support and Contracts Manager	Lewis Brunton	Lewis.Brunton@richmondandwandsworth.gov.uk
Vulnerabilities Manager Channel Chairperson	Mark Wolski	Mark.Wolski@RichmondandWandsworth.gov.uk
VAWG Manager	Albina Hiorns	Albina.Hiorns@richmondandwandsworth.gov.uk
Hate Crime and Prevent Coordinator	Shamila Majid	Shamila.Majid@richmondandwandsworth.gov.uk
Training and Development Officer - Safeguarding (Colleges)	Mary Scarlett	Mary.Scarlett@richmondandwandsworth.gov.uk
Children Missing in Education	Elizabeth Eyoma	Elizabeth.Eyoma@richmondandwandsworth.gov.uk
Private Fostering	Beatrice Ogunbowale	Beatrice.Ogunbowale@RichmondandWandsworth.gov.uk
Elective Home Education	Biddy MacIntyre	Biddy.Macintyre@richmondandwandsworth.gov.uk

ROLE/ORGANISATION	NAME	CONTACT DETAILS
TPD	Training & Professional Development Online	https://www.tpd.org.uk/ https://www.tpd.org.uk/cpd/portal.asp
DFE Helpline	DFE	For non-emergency advice: contact DfE dedicated helpline counter.extremism@education.gov.uk 020 7340 7264
Report suspected extremism online		https://www.gov.uk/report-suspicious-activity-to-mi5
Report terrorist activity online		https://www.gov.uk/report-terrorism
NSPCC	NSPCC	<u>Reporting child abuse and neglect NSPCC</u> : online reporting 24 hours day 0800 800 5000 (Telephone: Monday to Friday 8am – 10pm or 9am – 6pm at the weekends.)
Reporting Abuse in Education		
NSPCC helpline		0800 136 663 help@nspcc.org.uk

Police	www.gov.uk/contact-police
Metropolitan Police Service Project Azure Partnership Team	020 7161 2888
NSPCC FGM free phone helpline	0800 028 3550 [information may be passed anonymously]

Whistleblowing

NSPCC helpline	0800 028 0285 (8am-8pm Mon-Fri) help@nspcc.org.uk
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Homelessness			
Wandsworth Authority	Local	Housing	https://www.wandsworth.gov.uk/housing/

Multi-Agency Guidance on how Children, Young People and Families can access the right support at the right time in Wandsworth: [+ \(wscp.org.uk\)](http://wscp.org.uk)

Referral to MASH; The Wandsworth MASH is a model for managing and responding to referrals to Children's Social Care in Wandsworth; and all referrals to Wandsworth Children's Social Care are made to MASH. MASH is staffed by experienced managers, senior social workers and practitioners from a range of agencies e.g. Early Help, Police, Health, Education and Specialist workers e.g. substance misuse, domestic abuse.

All referrals to MASH should be completed on the **Multi-agency referral online form: MARF**. Where an **Early Help Assessment (EHA)** has already been completed with the family then this should be

submitted with the MARF to help inform decision making, however it is not necessary to have completed an EHA before a MARF is submitted

MASH practitioners are available for professional conversations in how to progress a referral if the child is not an open and allocated case to Social Care.

Referrals to MASH can be made by:

- Email: MASH@wandsworth.gov.uk
- Phone: 020 8871 6622 The MASH is in operation Monday-Friday, 9am to 5pm.
- Phone: 020 8871 6000 Concerns identified outside of these hours should be reported to the Wandsworth Out of Hours Service

Children's Social Care works with children at Level 3 and 4 of the London Continuum of Need. This includes;

- Section 17 children who are in need
- Section 47 children who are in need of protection
- Section 38 or 31 children who are looked after by Children's Social Care for whom the council has or shares parental responsibility for the child.
- Section 20 children who are looked after by Children's Social Care but for whom parental responsibility is with the parent and not the council. This is a voluntary arrangement.
- <https://www.gov.uk/report-child-abuse-to-local-council>

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 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.

- In the case of any concerns always record the information clearly and be clear how the concern has arisen.
- If the information you have indicates that the student has suffered harm or there is a high level of risk, ensure this is passed to the DSL immediately.
- In all other instances concerns should be passed on to the DSL at the as soon as possible – do not delay.
- Please remember the DSL is available to offer help, advice and guidance to staff and students where necessary. If you have a concern or problem and are unclear how to proceed ask for advice.
- In all cases ensure ongoing support is offered to the student as appropriate.

Early Help & Intervention

If early help is appropriate, the DSL and Welfare Officer will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the college will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

- All staff recognise that when a child or family may be experiencing difficulties, support is most effective if it is provided at as early a stage as possible
- This involves identifying emerging problems; liaising with the designated lead or other relevant colleagues; sharing information with other professionals to support early identification and acting as lead professional in undertaking an Early Help Assessment (EHA)
- Any concerns will be identified by staff, discussed with relevant colleagues and parents and support put in place. Effective monitoring systems will be used to assess the effectiveness of interventions and outcomes.
- **Any** child may benefit from Early Help but college staff will be particularly alert to the potential need for support for any student 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 misusing drugs or alcohol themselves;
 - Is at risk of modern slavery, trafficking or exploitation;
 - is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
 - has returned home to their family from care;
 - is showing early signs of abuse and/or neglect;
 - is at risk of being radicalised or exploited;
 - is a privately fostered child.
- If appropriate support is not available within college's own resources, an Early Help Assessment will be completed to identify the child's needs and enable additional support to be sought from other agencies
- A Team Around the Child will be established where appropriate and a Lead Professional identified
- If Early Help is in place the situation will be kept under constant review and consideration given to additional referrals (eg to social care) if the child's situation does not appear to be improving
- Early Help Assessments will follow the Wandsworth Thresholds Guidance and Wellbeing model

'Stepping up' or 'stepping down' through the levels of need It is important to note that a child or young person can move throughout the four levels of need as their own needs and circumstances change and as interventions are put in place to meet those needs. It is not the intention that children

and young people are 'labelled' at any level. This guidance should be used only to aid practitioners in making decisions as to what types of service can provide the right help at the right time. Well managed escalation and de- escalation between levels is therefore a critical element of effective multi-agency practice.

If the referral is not accepted by Wandsworth MASH they will contact the referrer to advise them of this outcome and will advise about other services that may benefit the child / family. In some instances Wandsworth MASH will advise you to hold a TAC meeting (TAC) to devise an effective plan to support the child at a targeted level (level 2).

Appendix 2: Types and signs of abuse

Staff must refer to KCSIE 2022 Part 1 and Annex B: Further Information for more details.

Indicators of abuse and neglect

All college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

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 or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults 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: 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.

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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Specific forms of abuse and safeguarding issues

It is important to recognise that many children will be living (or may have lived) in families where **Domestic Abuse** is a factor, and that these situations have a harmful impact on children emotionally, as well as placing them at risk of physical harm. The definition of Domestic abuse is: Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those **aged 16 or over** who are or have been intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional harm. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

The [Domestic Abuse Act 2021 \(Part 1\)](#) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and (e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Operation Encompass (formerly Project Tearose) is an information sharing agreement between the Metropolitan Police and Wandsworth Borough Colleges. Our college has signed up to this agreement.

Operation Encompass operates in all police forces across England. It helps police and colleges work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in college before the child or children arrive at college the following day. This ensures that the college has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or colleges should make a referral to children's social care if they are concerned about a child's welfare.

If police have responded to a domestic incident and there are children in the family, the officers working on Operation Encompass will disclose this incident to the child's college the following morning (Monday to Friday). The actual content of the information shared is kept to the minimum, i.e. outlining the offence, but without specific details.

Operation Encompass is integral to Children's Services and any queries should be directed to:

Safeguarding Queries: MASH or Ameliah Rayn

Technical Queries: Ameliah Rayn (can signpost and support)

Training Queries: MASH or Ameliah Rayn

Research shows that children who are involved or who have witnessed domestic abuse are more at risk of emotional harm and potentially physical harm. The information is shared in order to ensure the safety and wellbeing of the child and so that support can be offered to the child if necessary. The college is part of the network available to support the family and child.

Child sexual exploitation 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.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspensions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;

- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

Child Criminal Exploitation, 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.

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 college or education or do not take part in education.

CCE and CSE can affect children, both male and female and can include children who have moved (commonly referred to as trafficking) for the purpose of exploitation. It is important to note that the

experience of girls who are criminally exploited can be very different to that of boys. The indicators may be the same, however professionals should be aware that girls are at risk if criminal exploitation too. It is also important to note that boys and girls being criminally exploited maybe at higher risk of sexual exploitation. Further information of definitions and indicators is included in Annex B of KCSIE.

Gangs & Child criminal exploitation: 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

Sexual violence and sexual harassment between children can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

See Appendix 2 below for more information about **peer on peer (child on child) abuse**, including **sexual violence and sexual harassment between children**.

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim. **Upskirting is** a highly intrusive practice, which typically involve someone taking a picture under another person’s clothing (not necessarily a skirt) without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear). Upskirting is a specific criminal offense in England and Wales. Anyone, and any gender, can be a victim and this behaviour is completely unacceptable. Where committed for sexual gratification, upskirting can result in the most serious offenders being placed on the sex offenders register.

Serious Violence: Indicators which may signal that children are at risk from, or are involved in serious violence include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, sign of selfharm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions would 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. There are a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from college, having experienced child maltreatment and having been involved in offending, such as theft or robbery. More advice can be found in the Home Office’s [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).

Honour-Based Abuse: so called ‘honour-based abuse’ (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including female

genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. The college is aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

Female Genital Mutilation (FGM): Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM and have a specific legal duty to act with regards to concerns about FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 of the [Multi-agency statutory guidance on FGM \(HM Government, July 2020\)](#) (pages 59-61 focus on the role of colleges).

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a ‘special’ procedure to become a woman

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl’s return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

FGM is illegal in the UK and there is a mandatory duty on teachers 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. If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance [Mandatory reporting of female genital mutilation - procedural information \(January 2020\)](#) for further details about the duty.

Forced Marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 13-14 of the [Multi-agency guidelines: handling case of forced marriage \(HM Government, June 2014\)](#). Pages 32-36 of the [Multi-agency guidelines: handling case of forced marriage](#) focus on the role of colleges in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or fm@fco.gov.uk for advice and information.

Children and the court system: Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children.

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

Children Who Go Missing from Home or Care are particularly vulnerable and may be at significant risk at times. The immediate risks associated with going missing include:

- No means of support or legitimate income – leading to high risk activities
- Involvement in criminal activities
- Victim of Abuse
- Victim of crime, for example through sexual assault and exploitation
- Alcohol/substance misuse
- Deterioration of physical and mental health
- Missing out on college and education
- Increased vulnerability

Longer-term risks include:

- Long-term drug dependency/alcohol dependency
- Crime

- Homelessness
- Disengagement from education
- Child sexual exploitation
- Poor physical and/or mental health.

Children Missing from Education: all children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability and aptitude and any special educational needs they may have. A child going missing from education, or not attending it regularly, is a potential indicator of abuse or neglect. The college will follow the required procedures for unauthorised absence and for dealing with children who go missing from education, including appropriate notification to the Local Authority. The college will also ensure staff are alert to the potential risks of poor or non-attendance and cessation of attendance, including the signs to look out for and triggers to be aware of when considering the risks of potential concerns such as **travelling to war zones, FGM and forced marriage**. Refer to the Children Missing Education Policy and Attendance Policy for further information.

Preventing 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 the college's safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including 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.

The college aims to build students' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The college is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

The college works within the curriculum to promote tolerance and respect for diverse views, while challenging prejudice of any kind. The college is an inclusive college which values citizenship and a sense of belonging. Students are encouraged to share their views and recognise that they are entitled to have different beliefs, but that these should not be used to influence others.

It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As part of the Counter Terrorism and Security Act 2015, colleges have a duty to 'prevent people being drawn into terrorism'. Staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. College staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a referral to the Channel programme, having consulted [Channel duty guidance: protecting vulnerable people from being drawn into terrorism \(HM Government, April 2015\)](#).

The DfE and Home Office's briefing note [The use of social media for online radicalisation \(July 2015\)](#) includes information on how social media is used to radicalise young people and guidance on protecting students at risk.

As with all matters pertaining to the maintenance of a safeguarding culture within the college, staff are expected to be vigilant in identifying concerns and ensuring these are passed to the DSL without delay.

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside college
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

If any concerns arise, or are disclosed by a child, they will be responded to following normal safeguarding processes and advice would be sought from colleagues in LA (either Prevent coordinator or safeguarding services) if necessary.

The college supports the **Prevent Strategy**, which works to prevent the growth of issues that create a climate which encourages radicalisation and extremism, which in turn can lead to acts of violence or terrorism.

All colleges must have due regard to the need to prevent students from being drawn into terrorism or being radicalised. The college will ensure that staff are provided with appropriate training and information to enable them to assess the risk of children being drawn into extremist ideas that are part of terrorist ideology and identify any child who may be at risk and how to support them. The college will also ensure that children are safe from terrorist and extremist material when accessing the internet in college. Concerns will be discussed with the child's parents whenever possible and with the Local Authority Prevent and Hate Crime co-ordinator and referrals made to the Channel programme when appropriate. All referrals are made via MASH.

Homelessness: Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputies are aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may

be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, the college understands that this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. The college recognises that in some cases 16 - 18 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.

Potential signs of abuse

Recognising physical abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or an injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury.
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby (pre-mobile)
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shape. Those over 3 cm in diameter are more likely to have been caused by an adult or an older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of its own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns / scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

Fractures

Fractures may cause pain, swelling and discoloration over a bone or a joint. Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

Scars

A large number of scars or scars of different sizes or ages, or on different parts of body, may suggest abuse

Behavioural Indications

Some children may behave in ways that alert a staff member to the possibility of physical injury, for example

- Withdrawal from physical contact
- Fear of returning home

- Self-destructive tendencies
- Aggression towards others

Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent / carer e.g. anxious, indiscriminate or no attachment
- Aggressive behaviour towards others
- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a 'loner' – difficulty relating to others
- Over-reaction to mistakes
- Fear of new situations
- Inappropriate responses to painful situations
- Neurotic behaviours
- Self-harming
- Running away

Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and unresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from or late for college
- Child left with adults who are intoxicated or violent

- Child abandoned or left alone for excessive periods
- Compulsive stealing or scavenging

Recognising Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and / or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child / family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional / behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate for the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder, self-mutilation and suicide attempts)
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes for e.g. sports events (but this may be related to cultural norms or physical difficulties)
- Concerning changes in behaviour or general presentation
- Regressive behaviour
- Distrust of a particular adult
- Unexplained gifts of money
- Sleep disturbances or nightmares
- Phobias or panic attacks

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is disclosed
- Physical symptoms such as injuries to the genital or anal areas, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen in vagina, anus, external genitalia or clothing
- Wetting or soiling

Appendix 3: Peer on peer (child on child) abuse

The college recognises that children are capable of abusing their peers (including online) and works to minimise the risk of peer on peer (child on child) abuse and will deal with any allegations robustly. Abuse is abuse and should never be tolerated or passed off as ‘banter’, ‘just having a laugh’ or ‘part of growing up’. Behaviour such as initiation violence or any form of sexual violence or sexual harassment is not acceptable. It is recognised that even if there are no reported cases of peer on peer abuse, such abuse may still be taking place. Where needed risk assessments will be carried out and strategies put in place to protect the child who has suffered abuse and to offer them support. Concerns raised will be treated seriously and followed up in a timely and sensitive fashion in accordance with the procedures in this policy.

Managing situations where children have been abused by other children can be complex and stressful. For the purpose of this section of the policy, ‘child’ refers to any child or young person up to the age of 18 years. **All** staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger. Safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence such as rape, assault by penetration and sexual assault (see ‘Harmful sexual behaviour’ below)
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse (see ‘Harmful sexual behaviour’ below);
- 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 them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause victim humiliation, distress or alarm
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery) (see below); 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)

Occasionally, allegations may be made against students by others in the college, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a student, some of the following features will be found.

The allegation:

- is of a serious nature, possibly including a criminal offence
- refers to a student's behaviour towards a more vulnerable student (including where there is a difference in age)
- raises risk factors for other students in the college
- indicates that other students may have been affected by this student
- indicates that young people outside the college may be affected by this student

The college takes steps to minimise the risk of all types of peer-on-peer abuse. Staff have an important role to play in preventing it and responding where they believe a child may be at risk from it. The college has robust anti-bullying procedures in place (see the college's AntiBullying Policy) and students are taught at all stages of the college about acceptable behaviour and how to keep themselves safe as part of the Life Education programme (see the Life Education Policy and Relationships and Sex Education Policy). Appropriate action is taken to protect students identified as being at risk including the particular vulnerabilities of those with a special educational need or disability. If needed a bespoke student safety plan is implemented.

Harmful sexual behaviour

Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment. The college recognises that problematic, abusive and violent sexual behaviours are inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online and offline (both physical and verbal) and the college recognises the gendered nature such behaviour can take. Harmful sexual behaviour, like all peer on peer abuse, is never acceptable and will be taken seriously. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. The college will respond to allegations seriously and all victims will be offered appropriate support.

The college is aware of the importance of:

- making it clear to students that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and

- challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

References to **sexual violence** are references to sexual offences under the Sexual Offences Act 2003, specifically rape, assault by penetration and sexual assault.

References to **sexual harassment** mean "unwanted conduct of a sexual nature" that can occur online and offline. In the context of child on child sexual harassment, it is likely to: violate a child's dignity; and / or make them feel intimidated, degraded or humiliated; and / or create a hostile, offensive or sexualised environment.

Youth produced sexual or indecent imagery

Indecent imagery is the legal term used to define nude or semi-nude images, videos or live streams of children and young people under the age of 18. This could be via social media, gaming platforms, chat apps or forms. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Consensual and non-consensual sharing of nude images and/or videos can be signs that children are at risk.

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive - but children still need to know it is illegal - whilst non-consensual is illegal and abusive. The college follows the guidance given by the [UK Council for Internet Safety \(UKCIS\): Sharing nudes and semi-nudes \(December 2020\)](#).

The college treats all incidences of sexting as safeguarding matters to be actioned in accordance with this policy.

Members of staff should not view sexual imagery which is reported to them, or copy, print, share store or save the images under any circumstances. In referring any incident of sexting, members of staff should describe the content of the images as reported to them.

The DSL may in exceptional circumstances view images with the prior approval of the headmaster and only where:

- it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;
- it is necessary to report the image to a website or agency to have it taken down; or
- a student has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable.

Where viewing an image is unavoidable:

- viewing should take place on college premises wherever possible;
- the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);
- a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;
- full details of the viewing must be recorded in the college's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;
- any member of staff who views an indecent image should be given appropriate support.

If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.

If an electronic device that is prohibited by the college rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

If external agencies do not need to be involved, the college must consider the deletion of any images. Students should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.

If images have been shared online and cannot now be deleted by the person who shared them, the college should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).

Where a student receives unwanted images, the college should advise the student and his / her parents of options that may be available to block the sender or to change the student's mobile phone number or email address.

The UK Council for Child Internet Safety's advice [Sharing nudes and semi-nudes \(December 2020\)](#) contains details of support agencies and provides further information for colleges on how to respond to incidents of nudes and semi-nudes.

The College of Policing has also produced a briefing note [Police action in response to youth produced sexual imagery \("sexting"\) \(November 2016\)](#) which provides information on how police forces treat instances of sexting by young persons.

It is important to be conscious that any child who is engaging in abusive behaviour towards others may have been subject to abuse from other children or from adults. All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all students involved, including support from external services as necessary.

Children who abuse others should be held responsible for their abusive behaviour, whilst being identified and responded to in a way which meets their needs as well as protecting others. All peer on peer abuse is unacceptable and will be taken seriously.

There is significant research evidence which indicates that abuse is likely to be repeated without appropriate intervention and treatment. This must be considered throughout the planning stages of managing cases of abuse perpetrated by children.

Where an allegation is made regarding alleged abuse perpetrated by another child, the age and understanding of the alleged perpetrator must be considered throughout decision making.

The circumstances of the alleged perpetrator must be assessed separately from those of the alleged victim and must include exploration of why this behaviour has occurred.

The focus of involvement with the alleged perpetrator and their family will be both to determine risks to and from the child concerned within the parameters of the Children Act 1989, and to manage allegations against them within the criminal justice framework.

Process

When an instance of child on child abuse comes to light, is disclosed or where there is evidence to indicate it has occurred, staff should contact the DSL or deputies. The DSL (or deputy) will make a referral to children's social care, CAMHS and police as appropriate in respect of both children concerned. The interests of the identified victim must always be the paramount consideration.

If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 KCSIE and take into account the local response of the police and children's social care to these issues.

Where the allegation relates to an incident that took place within the college, or relates to students attending the same college, the college will take all appropriate action to ensure the safety and welfare and continued education of all students including the alleged perpetrator. The following are examples of action the college may take:

- Take advice from children's social care and / or the police, as appropriate, on when and how to inform the student and his / her parents about the allegations and how investigation of such allegations will be conducted
- Keep the involved children separate during the college day while the investigation is taking place to avoid collusion or intimidation. A student against whom an allegation of abuse has been made may be suspended from the college as a neutral measure during the investigation
- Having established what is alleged to have taken place, avoid talking to the children any further about the incident (s)
- Keep a detailed log of actions, discussions and decisions
- Assess the risk and implement a student safety plan as necessary – ensure that nonteaching times are considered, especially times when students are moving around the college as the child who has been harmed may feel very vulnerable at such times
- Be aware that whether the incident(s) happened in college or elsewhere, other students may know what has happened (or is alleged to have happened). Other students may have been involved, either directly or indirectly. Other students may be judgemental or make unkind, or even threatening comments
- Consider whether the situation warrants information being shared with other parents in the college (e.g. where press coverage is likely) and seek advice from relevant agencies.

The decision as to whether or not behaviour directed at another child should be categorised as harmful is clearly dependent on the individual circumstances of the case. It may be helpful to consider the following factors:

- The relative chronological and developmental age of the two children
- Whether the alleged abuser is supported or joined by other children
- Any differential in power or authority (e.g. related to race, gender, physical, emotional or intellectual vulnerability of victim)
- The actual behaviour (consider all factors)
- Whether the behaviour could be described as age appropriate or involves inappropriate sexual knowledge or motivation

- The degree of coercion, physical aggression, intimidation or bribery
- The victim's experience of the behaviour and the impact it is having on them
- Attempts to ensure secrecy
- Duration and frequency of behaviour

The college will take advice from children's social care and / or the police, as appropriate, on how the investigation of such allegations will be conducted.

Appropriate support will be provided to all students involved by the college's pastoral team, and students may be referred to the college's counselling services. Support from external services will be requested as necessary. Additional guidance is available via the London Child Protection procedures

Appendix 4: Visitors

- On site, teaching staff and support staff wear purple lanyards and the college name/ logo in white text. Teachers and support staff also have an ID badge with their name
- All other visitors to the college are expected to sign in at reception and receive a sticker.
- College governors should sign in as a visitor. If there is nobody available in the office, governors should attempt to sign in as normal; otherwise present themselves to whoever they are meeting as soon as possible on arrival

Appendix 5: Procedures regarding allegations against staff

The usual procedure regarding allegations against staff is set out below, but may be varied according to the specific circumstances of the allegation.

There may be a need for the Principal to involve the police immediately, in cases of potential serious risk of harm to children or where there is evidence of a criminal offence having been committed.

In other cases, the Principal or DSL (or chair of governors if the allegation involves the headmaster) will discuss the allegation with the LADO (or his/her deputy) immediately (and in any event within one working day) before further action is taken.

The person taking action in accordance with these procedures is known as the '**case manager**'.

Disclosure of information

The case manager will provide the accused person with information about the allegation, as quickly and in as much detail as is possible after the LADO has been consulted. The parents or carers of the child / children involved will be informed of the allegation as soon as possible if they do not already know of it. They may also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

Where the LADO advises that a strategy discussion is needed, or the police or children's social care need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

Further action to be taken by the college

A college has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The college will take action in accordance with Part 4 of KCSIE and the college's employment procedures.

A member of staff (or worker) resigning, retiring or ceasing to provide services during the period between an allegation being made and the case being concluded, should not prevent the relevant processes being completed.

Ceasing to use staff

If the college ceases to use the services of a member of staff because they are unsuitable to work with children, a settlement agreement will not be used and a referral to the Disclosure and Barring Service (DBS) will be made promptly if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within the college, with a report being presented to the proprietor without delay. The college may also need to consider a referral to the DBS if a member of staff is suspended, or deployed to another area of work that is not regulated activity.

If a member of staff tenders his or her resignation, or ceases to provide his or her services at a time when child protection concerns exist in relation to that person, those concerns will still be followed up by the college in accordance with this policy and a referral to the DBS will be made promptly if the criteria for referral are met. Refer to DfE guidance [Making barring referrals to the DBS](#) for further information.

Separate consideration will be given as to whether a referral to the Teaching Regulation Agency (TRA) should be made where a teacher has been dismissed, or would have been dismissed had he / she not resigned, because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence. An interim referral to the TRA may also be considered and made if appropriate.

Record keeping

A clear and comprehensive summary of the allegation, details of how it was followed up and resolved, and a note of action taken and decisions reached must be kept on the confidential personnel file of the individual, with a copy provided to them.

- The purpose of the record is: to enable accurate information to be provided in a future reference request; to give clarification where future DBS checks reveal information about an allegation that does not result in a criminal conviction; or to prevent unnecessary re-investigation of an allegation that resurfaces after a period of time.
- Details of allegations found to be malicious must be removed from personnel records.

The college will retain all safeguarding records and relevant personnel records for so long as reasonably required.

Employment references for an individual where an allegation has been made will include relevant details, unless the allegation (or series of allegations/concerns) have been proven to be false, unsubstantiated or malicious.

Conclusion

At the conclusion of a case where an individual has been suspended and may return to work, support for that individual will be discussed in advance. This may include a phased return, mentoring or specific support. Contact with the person who made the allegation will also be discussed so that it can be proactively managed.

At the conclusion of a case where an allegation is determined to be unsubstantiated or malicious, the LADO may refer the matter to children's social care services to assess whether there are other services

that they need, or if abuse has happened with someone else. Where an allegation is proven to be deliberately invented or malicious, the headmaster may consider disciplinary action against the student. Where such an allegation has not come from a student, the police may be asked if any action should be taken against the person responsible.

At the conclusion of any case where an allegation has been made against a member of staff, the DSLs should review the circumstances of the case with the headmaster, to determine any lessons that may be learned, to improve procedures or practice within the college and prevent any future incidents.

WCSP have produced a resources outlining the process for dealing with allegations about staff:

<https://wscp.org.uk/find-help/professionals-and-volunteers/allegations-against-staff-andvolunteers-who-work-with-children-or-those-in-a-position-of-trust/>

Appendix 6: Resources

London Child Protection Procedures

Procedures and guidance available here: <https://www.londoncp.co.uk/>

Wandsworth Child Protection Partnership Resources

Advice on a number of key topics is available here: <https://wscp.org.uk/>

Keeping children safe in education 2022

[Working Together to Safeguard Children, \(DfE, July 2018\)](#)

[What to do if you are worried – revised guidance for all professionals to use if they are worried a child may be being abused \(DfE, March 2015\)](#)

[Information Sharing Guidance: Advice for practitioners providing safeguarding services to children, young people, parents and carer \(DfE, July 2018\)](#)

[Revised Prevent duty guidance for England and Wales \(HM Government, April 2021\)](#)

[Channel duty guidance: protecting vulnerable people from being drawn into terrorism \(HM Government, February 2021\)](#)

[Multi-agency statutory guidance on female genital mutilation \(HM Government, July 2020\)](#)

[When to call the police – Guidance for schools and colleges \(NPCC\)](#)

[Sharing nudes and semi-nudes: advice for education settings working with children and young people \(DfE and UK Council for Internet Safety, December 2020\)](#)

[Children missing education \(DfE, September 2016\)](#)

[Criminal exploitation of children and vulnerable adults: county lines \(Home Office, February 2020\)](#)

[Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation \(DfE, February 2017\)](#)

[Mental Health and Behaviour in colleges – Departmental Advice for College Staff \(May 2018\)](#)

Domestic Violence – Guide for Colleges

[NSPCC: UK domestic-abuse signs symptoms effects](#)

[Refuge: what is domestic violence/effects of domestic violence on children](#)

[SafeLives: young people and domestic abuse](#)

Thresholds for Intervention – Multi-Agency guidance

Wandsworth Guidance, via website

Whistleblowing Policy – General guidance can be found at <https://www.gov.uk/whistleblowing>

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

Online Safety

[Teaching Online Safety in Colleges \(DfE, June 2019\)](#)

[UK Council for Child Internet Safety \(UKCCIS\) - Education for a Connected World \(June 2020\)](#)

Peer on Peer Abuse

[Peer on Peer Abuse Toolkit \(Farrer & Co, 2019\)](#) - addressing child on child abuse 2022

Charity Commission

[Strategy for dealing with safeguarding issues in charities \(Charity Commission, December 2017\)](#)

[Regulatory alert to charities - safeguarding \(Charity Commission, December 2017\)](#)

[How to report a serious incident in your charity \(Charity Commission, June 2019\)](#)

Appendix 7: Reporting an incident

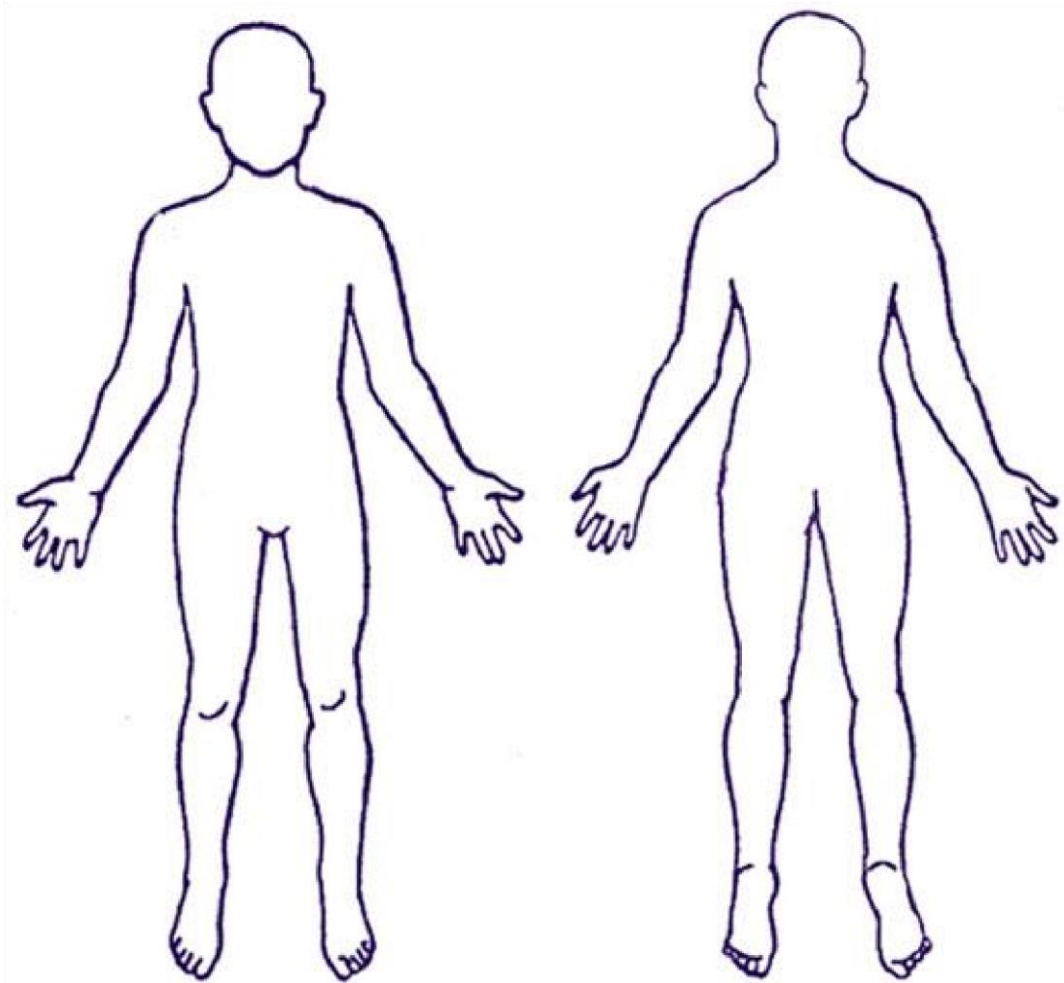
Please write all names in capitals.

After filling in, please hand in to the DSL in an envelope marked “private and confidential” or email marked 'Confidential'. Use c.graham@sfx.ac.uk where possible.

1.	Name of person(s) reporting the incident	
2.	Date when incident happened	
3.	Place where incident happened	
4.	Name(s) and form of student(s) involved	
5.	Name(s) of witnesses involved	
6.	Description of the incident (give full details)	
7.	Signature	
8.	Today's date	

If relevant, indicate on the drawing below the parts of the body affected.

You must not expect or ask a student to either undress or show areas of their body for evidence which cannot be seen under normal clothing.



This form should be completed as soon as possible after you are made aware the incident.

When filling in this form, it is essential that facts (and not opinions) are recorded. Students and parents may be entitled to see any written information on this matter. If in doubt please discuss the matter first with the DSL or, in their absence, one of their deputies.

Discretion is very important in these cases and, once the incident has been reported, colleagues should not discuss the matter any further with other parties, either now or at any point in the future.