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**THIS POLICY APPLIES TO WYCLIFFE COLLEGE, WYCLIFFE PREP SCHOOL AND WYCLIFFE PRE-PREP SCHOOL (INCLUDING EYFS) TOGETHER REFERRED TO IN THIS POLICY AS "WYCLIFFE" OR "THE COLLEGE".**

## **INTRODUCTION**

Wycliffe (this refers to Senior School, Prep, Pre-Prep and the Early Years Foundation Stage "EYFS") fully recognises its duty and responsibility to consider the best interests of its pupils and to safeguard and promote the welfare of the children and young people in its care to enable pupils to achieve the best outcomes. Wycliffe acknowledges that safeguarding is everyone's responsibility. Wycliffe adopts a 'whole College' approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Wycliffe recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse. The College will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding at all times. This policy is prepared in accordance with the statutory guidance [Working Together to Safeguard Children](#) and the procedures and practices of the Gloucestershire Safeguarding Children Partnership ("GSCP"). This responsibility encompasses the following principles:

- To provide help and support to meet the needs of children as soon as problems emerge
- To protect children from maltreatment, whether that is within or outside the home, including online
- To prevent impairment of children's mental or physical health and development
- To ensure that children are growing up in circumstances consistent with the provision of safe and effective care
- To treat the interests of our children as paramount (taking into consideration any special educational needs and disability ("SEND") or certain health conditions, their culture and their history)
- To consider at all times the best interests of the child

Parents are encouraged to raise any concerns directly with the College, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children.

## **EQUALITY ACT 2010**

The College understands and recognises their obligations under the Equality Act and that the College must not discriminate against pupils because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the College will consider how to support pupils with regard to particular protected characteristics in order to meet their specific needs. The College will also consider their duty to make reasonable adjustments for disabled pupils.

The College also complies with its legal duties under the Equality Act 2010, including putting special provision in place to support dialogue with children who may not be able to convey their wishes and feelings as they may want to. This might include, for example, those who have communication difficulties and those who do not speak English or for whom English is not their first language.

The Council of Trustees approves this policy and it is annually reviewed by them. The policy encompasses the College's boarding provision and off-site activities. Wycliffe addresses its commitment to the above principles through:

**Prevention** - ensuring all reasonable measures are taken to minimise the risk of harm to children's welfare. These include:

- Ensuring Safer Recruitment practice\*\*.

- Ensuring through training that all teaching and non-teaching staff are aware of and committed to the Safeguarding Policy and Child Protection Procedures ("the Policy and Procedures") (including Child-on-Child Abuse Policy), Staff Code of Safe Practice, Whistleblowing Policy, Pupil Behaviour Policy Pre-Prep/Prep School, and Pupil Behaviour Policy Senior School.
- Establishing a positive, supportive and secure culture in which children can learn and develop, together with a College ethos which promotes in all pupils a sense of being valued, listened to and respected.
- Ensuring that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHEE to help children to adjust their behaviours, both inside and outside of College, in order to reduce risks and build resilience, including to radicalisation and extremism. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The College recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.
- Relationships and Sex Education (RSE) is compulsory from September 2020, and forms part of the College's Life Skills/PSHEE programme. The College understands that preventative education is most effective in the context of a whole-College approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia, and sexual violence/harassment. The College will have regard to the DfE's statutory guidance [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#).
- Providing pastoral support that is accessible and available to all pupils and ensuring that pupils know to whom they can talk about their concerns. Ensuring pupils understand what safeguarding is and how it is there to protect them not criminalise them.

(\*\*The College is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the College whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the College. Please refer to separate policies and guidance for full details; this guidance will follow the Independent Schools Standards Regulations and comply with guidance with regard to the Disclosure and Barring Service ("DBS").

Members of the teaching and non-teaching staff at the College including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with "barred list" information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the College may undertake an online update check through the DBS Update Service.

As part of the shortlisting process, the College will also consider carrying out an online search on shortlisted candidates as part of its due diligence. This may help to identify any incidents or issues that have happened and are publicly available online, which the College may want to explore with an applicant at interview. This forms part of the College's wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a College environment.

The College's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in the College's Visitor Policy.

**Protection** – ensuring all appropriate actions are taken to address concerns about the welfare of a child or children, working to agreed local policies and procedures in full partnership with other local agencies especially the Police and Children’s Social Care (Safeguarding Children Joint Chief Inspectors’ Report Department of Health October 2002). These include:

- Sharing information about concerns with agencies who need to know and involving children and their parents/carers appropriately (including Children’s Social Care, the Police, the Local Authority Designated Officer (“LADO”) and in “Prevent” with the Channel process).
- Any member of staff can refer to the LADO or Children’s Social Care; however it is the expectation that the Designated Safeguarding Leads (“DSLs”) at Wycliffe are the primary communicators with LADO and Children’s Social Care as appropriate. They will contact the LADO and local safeguarding partner arrangements within 24 hours of a disclosure or suspicion of abuse, although if there is risk of immediate harm this contact must be immediately.
- The function of the LADO is to provide advice and preside over the investigation of any allegation or suspicion of abuse directed against anyone working in a school. Gloucestershire’s LADO can be contacted on 01452 426994.
- Monitoring children known or thought to be at risk of harm and to contribute to assessments of need and support packages for those children.

Safeguarding, in addition to child protection, encompasses issues such as pupil health and safety, bullying/cyber-bullying, appropriate medical provision, drugs and substance misuse. These have specific policies and guidance, which should be read in conjunction with this document.

## **MANAGING SAFEGUARDING AND CHILD PROTECTION**

### **Roles and Responsibilities**

#### **Staff**

Staff play a key role in identifying concerns early to promote children's welfare and prevent concerns from escalating. It is important to maintain an attitude of 'it could happen here', and for staff to be aware of the systems in place which support safeguarding, for example the Behaviour Policy, Staff Code of Safe Practice, online filtering and monitoring.

All staff including volunteers and supply teachers have a statutory obligation to report to the College DSL, or individual College/Section DSL (preferably via CPOMS) if there is suspicion of abuse of a pupil, if a pupil discloses abuse or allegations of abuse or if there is any indication that a child is being abused by somebody.

In addition, any members of staff may refer a concern to The Gloucestershire Multi-Agency Safeguarding Hub (“MASH”), Community Social Work Team or the LADO themselves if they feel it necessary or appropriate. Contact details for key external and internal contacts can be found at Appendix VII.

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

**This is an inescapable, personal, and professional responsibility of all staff and volunteers for the protection of children from harm.**

**All staff need to have read and understood and be able to discharge their responsibilities as set out in Keeping Children Safe in Education (“KCSIE”) and with due reference to The Prevent Duty and Working Together to Safeguard Children Guidance. For those staff that do not work directly with children, they will be required to read and understand Annex A of KCSIE. All other staff will be required to read and understand at least Part 1 of KCSIE.**

Staff could have their suspicion or concern raised in a number of ways, the most likely of which are:

- the conduct of a member of staff
- a child, parent or member of staff 'disclosing' abuse or suspected abuse
- evidence of physical hurt or deterioration in mental health that may or may not be accompanied by unusual or uncharacteristic behaviour by a child.

The following individuals have specific roles and responsibilities under Child Protection Procedures that are outlined below:

### **Council of Trustees**

**It is an essential feature of good governance that responsibility is not delegated to others without first ensuring reliable mechanisms for monitoring and evaluation of policy implementation.** Trustees (as displayed on the College's website) have ultimate and collective responsibility for ensuring pupils' wellbeing, which encompasses safeguarding. Their responsibilities include:

- assessing the safeguarding risks that might arise from the College's operations;
- ensuring that the College has a Policy and Procedures known to all staff and Trustees, that are in accordance with Local Authority and inter-agency procedures, and that these are made available to parents on request;
- ensuring that staff are competent, supported and regularly reviewed in relation to safeguarding;
- carrying out a review of this Policy and these Procedures annually in the Autumn term and following any serious incident report to the Charity Commission;
- approving each College's Annual Safeguarding Audit and submitting these to the local safeguarding partner arrangements;
- undertaking monitoring to ensure effective implementation of the Policy and Procedures through:
  - i. an annual presentation from the DSLs and through informal and on-going discussion with staff which must cover staff training; the steps being taken to listen to pupils; any referrals to children's services (anonymised) in respect of the promotion of welfare; any referrals to the LADO in respect of staff/volunteers; and specific themes arising from these or elsewhere in the College and steps taken as a result;
  - ii. enquiry of staff about their knowledge of the Policy and Procedures;
  - iii. ensuring that staff have received regular safeguarding training (and that e-safety training for staff is considered as part of the overarching safeguarding approach);
  - iv. ensuring Trustees receive appropriate safeguarding and child protection training at regular intervals. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the College are effective and support the delivery of a robust whole College approach to safeguarding.
- approving the College DSL and Section DSLs job descriptions which include the key activities of the role;
- should ensure that children are taught about how to keep themselves and others safe, including online;
- ensuring that the College Leadership Team ("SLT") are also aware of local safeguarding procedures and the College's safeguarding obligations.

The College's Welfare Committee reports to the Council of Trustees and has delegated responsibility for scrutiny of the Annual Safeguarding Audit and the Policy and Procedures prior to their submission to the Council of Trustees.

### **Nominated Trustee**

**Mrs Elizabeth Buckley** is the **Nominated Trustee** for Safeguarding and Child Protection at Wycliffe (including EYFS). Her responsibilities include:

- On behalf of the Council of Trustees, carrying out detailed monitoring of the implementation of the Policy and Procedures (including an annual review of sample entries in the Single Central Register);
- Maintaining close and regular contact with the DSLs;
- Working with the DSLs to review the Annual Safeguarding Audit and judge the efficiency with which procedures have been implemented and to report on this to the Council of Trustees.

The College considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the College's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation, including lessons learnt.

The **Nominated Trustee** for Safeguarding and Child Protection can be contacted through the Clerk to the Trustees, **Mr Luke Godley**, [luke.godley@wycliffe.co.uk](mailto:luke.godley@wycliffe.co.uk) or telephone 01453 820403.

### **Chair of Council of Trustees**

It is the role of the Chair of Council of Trustees, **Mr Simon Lloyd**, to deal with allegations of abuse made against the Heads of the College. In the absence of the relevant Head any allegation of abuse against a member of staff will be reported to the Chair of Council of Trustees.

The **Chair of Council of Trustees** can be contacted through the Clerk to the Trustees, **Mr Luke Godley**, [luke.godley@wycliffe.co.uk](mailto:luke.godley@wycliffe.co.uk) or telephone 01453 820403.

### **Heads**

**Mr Christian San José** is the Head of Wycliffe College and **Mrs Helena Grant** is the Head of Wycliffe Prep School.

Their responsibilities include:

- ensuring that the Policy and Procedures approved by the Council of Trustees are understood and fully implemented by all staff;
- ensuring that the roles of DSL are filled by individuals with appropriate qualifications and experience and given significant prominence in the College community;
- ensuring that Department for Education ("DfE") guidance is followed to ensure safe staff recruitment and that adequate staff checks and records are maintained.
- Supporting and promoting a safeguarding culture and ethos in College so that child/ren's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensuring systems are in place for children to express their views and give feedback.
- Following the whistleblowing policy and procedures if an allegation is made against a member of staff supply staff or volunteer all staff, including liaising with the Local Authority Designated Officer (LADO) and referring anyone who has harmed or may pose a risk to a child to the Disclosure and Barring Service.
- That pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.

**The Designated Safeguarding Leads (DSLs and DDSLs)**

- The **College Designated Safeguarding Lead** is **Mrs Caoimhe Pettingell**.
- In the Senior School, the **Section Designated Safeguarding Lead** is Ms Sian Evans, and the Deputy Designated Lead is **Mr Scott Costello**. **Miss Jennifer Price** will be providing Senior School DSL maternity cover.
- In the Prep School, the **Section Designated Safeguarding Lead** is **Mr Richard Lee**, and the Deputy Designated Safeguarding Lead is **Miss Lauren Oliver**.
- In the Early Years, the **Section Designated Safeguarding Lead** for EYFS is the Nursery Class Teacher, Mr David Aherne.

**Contact details for the Designated Safeguarding Leads and Deputies:**

College DSL

Mrs Caoimhe Pettingell – email [caoimhe.pettingell@wycliffe.co.uk](mailto:caoimhe.pettingell@wycliffe.co.uk) and telephone 01453 820415 or 07591 952289

Senior College DSL

Ms Sian Evans – email [sian.evans@wycliffe.co.uk](mailto:sian.evans@wycliffe.co.uk) and telephone 07857 614295

Senior College DSL (maternity cover)

Miss Jennifer Price – email [Jennifer.price@wycliffe.co.uk](mailto:Jennifer.price@wycliffe.co.uk) and telephone 07968 423624

Senior College DDSL

Mr Scott Costello - email [scott.costello@wycliffe.co.uk](mailto:scott.costello@wycliffe.co.uk) and telephone 07763 556670

Prep College DSL

Mr Richard Lee – email [richard.lee@wycliffe.co.uk](mailto:richard.lee@wycliffe.co.uk) and telephone 07968 423632

Prep College DDSL

Miss Lauren Oliver – email [lauren.oliver@wycliffe.co.uk](mailto:lauren.oliver@wycliffe.co.uk) and telephone 07512 721593

Early Years DSL

Mr David Aherne - email [david.aherne@wycliffe.co.uk](mailto:david.aherne@wycliffe.co.uk) and telephone 01453 820475

During term time, the DSLs will always be available in person (during school hours) for staff in the College to discuss any safeguarding concerns. If a DSL is not available in person, they can be contacted using the contact details above. For out of term activities, the College's arrangements are to contact the DSL/DDSL on duty via the safeguarding email: [safeguarding@wycliffe.co.uk](mailto:safeguarding@wycliffe.co.uk), or to phone the College office 01453 820411.

The College will support the DSLs in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

For DSL job descriptions: See Appendix I

### **Ethos of the College**

The College is a place where:

- All individuals are respected and their individuality is valued
- Pupils are encouraged to achieve
- Self-discipline is promoted and good behaviour is the norm
- Rewards and disciplinary penalties (sanctions) are applied fairly and consistently

The College's policies seek to reflect the highest moral standards. In particular, bullying and other anti-social behaviour will not be tolerated. As a College founded on Christian principles, the College recognises that pupils make mistakes and that pupils who do so should be able to make reparation where reasonably possible. The College understands that problems are likely to have underlying causes and the College will seek to take account of these and help address any underlying issues.

The College ensures that it has systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously and knowing they can safely express their views and give feedback. The College operates its processes with the best interest of its pupils at heart.

### **Awareness, Training and Support**

Any member of staff can refer to the LADO or Children's Social Care (The MASH or Community Social Work Team); however it is the expectation that the College DSL and Section DSLs are the primary communicators. They will contact the LADO and local safeguarding partner arrangements within 24 hours of a disclosure or suspicion of abuse.

Together the DSLs hold the following responsibilities:

### **Raising Awareness**

- to take lead responsibility for all safeguarding and child protection matters arising at the College, and to support all other staff in dealing with any child protection concerns that arise;
- to maintain an overview of safeguarding within the College and to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the College's policies and procedures in practice;
- to take lead responsibility for online safety and understanding the filtering and monitoring systems and processes the College has in place;
- to have the status and authority within the College to carry out the duties of the post including committing resources and, where appropriate, supporting and directing staff to safeguard and promote the welfare of children;
- promoting and safeguarding the welfare of children and young persons for whom they are responsible and with whom they come into contact. This includes liaising with the Mental Health Support Team where safeguarding concerns may be linked to mental health;
- to monitor and review annually, liaising with the Board of Trustees, the effectiveness of the Safeguarding Policy and Child Protection Procedures to ensure that they comply with current best practice;
- to ensure parents have access to the Safeguarding Policy and Child Protection Procedures which alerts them to the fact that referrals may be made and explain the role of Wycliffe in this to avoid later conflict. Available on the College website and a hard copy is provided on request or from reception to ensure, where necessary, records are passed on to the receiving school if a pupil transfers;
- Where a pupil leaves the College, including for in-year transfers, the DSL will ensure their child protection file is transferred to the new school (separately from the main pupil file) 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. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the College;

- to have good links and working relationship with the local safeguarding partner arrangements and LADO/Police (if a criminal matter) so that staff are aware of local policies and training opportunities and keep staff aware of child protection procedures.

### **Training and Support**

- All staff will receive the yearly interim Child Protection and Safeguarding update from the College DSL at the beginning of each academic year (or when they join mid-year), as well as a three-yearly longer update of any changes within Child Protection and Safeguarding nationally and locally, in line with advice from Gloucestershire Safeguarding Children Partnership. Training will include online safety and harmful sexual behaviours (including child-on-child sexual violence and harassment). It will also include Prevent awareness training to equip staff to understand the factors that lead people to support terrorist ideologies or engage in terrorist related activity, be able to recognise susceptibility to terrorism and be aware of what action to take in response, including the College's internal Prevent arrangements.

The DSLs will ensure that:

- policy and procedures are set and updated at least annually, and are complied with throughout the College;
- the College and their own practices and concerns about welfare and safeguarding matters are regularly reviewed. This includes the personal and professional duty of all staff to report welfare/safeguarding concerns to a DSL, or in the absence of action, directly to Children's Services;
- all staff understand the role of the DSLs;
- all staff, including Trustees, receive and read at least Part 1 KCSIE and appropriate confirmation of this is recorded and mechanisms are in place to assist staff to understand and discharge their roles and responsibilities;
- each time Part 1 of KCSIE is updated by the DfE, staff are updated on the changes via email. All staff are required to read at least Part one of and confirm that they have done so;
- All staff undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The College provides these via, for example, emails, e-bulletins, online training and staff meetings;
- all staff, including Trustees, receive the Staff Code of Safe Practice;
- the DSLs undertake either local safeguarding partner arrangements training or national training (Levels I and Advanced) and undertake regular updates once every two years as a minimum to include inter-agency working, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the GSCP's approach to Prevent duties, and harmful sexual behaviours, plus any additional training to remain compliant with new guidance and legislation;
- Child Protection training is managed and delivered to the Heads and all staff who work with children, and records are kept of this training. Any new legislation or updates will be communicated to staff on a regular (at least annual) basis either electronically or through Inset (or both);
- all new staff, including Trustees, temporary staff and volunteers, are provided with induction training that includes:
  - Wycliffe's Safeguarding and Child Protection Policy, including the Child-on-Child Abuse Policy, Whistleblowing Procedure, and Prevent Duty
  - the Staff Code of Safe Practice, the College's acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media

- the identity and role of the College DSL and Section DSLs
- a copy of at least Part 1 KCSIE (and Annex B and Part 5 as appropriate)
- ICT & E-Safety Policy, including safe use of Social Media
- the pupil behaviour policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children missing education;

Copies of the above documents are provided to all staff during induction.

The Council of Trustees will ensure that trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the College are effective and support the delivery of a robust whole College approach to safeguarding. Their training should be regularly updated.

The Council of Trustees is aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the College to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the ECHR Convention. The Data Protection Act 2018 and the UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

### **Referrals**

- The DSL (or DDSL) should liaise with the three safeguarding partners and work with other agencies in line with *WT*. “*NPCC - When to call the Police*” can assist the DSL (or DDSL) understand when they should consider calling the Police and what to expect when they do. If the College has questions about any Police investigation, it will ask the Police.
- To communicate immediately with the local safeguarding partners arrangements, (including Children's Social Care, the DBS and the Police) whenever an allegation or disclosure is made (current or historical). The College does not have any threshold for referrals. It always direct all allegations to Children's Social Care.
- To have sound knowledge of the different forms of abuse and a clear understanding of the possible physical and behavioural indicators and know when it is appropriate to make a referral to Children's Social Care (Gloucestershire MASH 01452 426565).
- To ensure all staff are prepared to identify children who may benefit from [Gloucestershire 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.
- To ensure that in all cases of actual or alleged harm to a pupil, the Local Authority Safeguarding Procedures are followed. This will involve contacting the LADO, should the allegation be against a member of staff, otherwise referring to Children's Social Care. The function of the LADO is to provide advice and preside over the investigation of any allegation or suspicion of abuse directed against anyone working in a school. Gloucestershire's LADO can be contacted on 01452 426994.
- To inform the Heads of all cases of actual or suspected abuse. The only exception to this would be if a Head was implicated in the concerns, in which case, the Head would not be informed and the matter would be referred directly to the Chair of Trustees.
- To act as a focal point for liaison with Children's Social Care and other authorised agencies, ensuring that full and prompt sharing of information is provided at the time of referral and that the referral is confirmed in writing under confidential cover.
- To act as a source of support, advice and expertise within College on matters of Child Protection and welfare.

- To ensure that clear, detailed written records of welfare concerns about pupils are on CPOMS and any paperwork is kept secure and in a locked location.
- To refer cases where a crime may have been committed to the Police as required. [When to call the Police \(NPCC\)](#).
- To refer cases where a person is dismissed or leaves the College due to risk/harm to a child to the DBS as required.

This needs to be carried out in order to inform relevant agencies of any allegations of serious harm or abuse of any person living, working or looking after children on the College premises (whether that allegation relates to harm or abuse committed on the College premises or elsewhere), or any other abuse which is alleged to have taken place on the College premises and of the action taken in respect of these allegations.

For those children who have need of additional support or input from external agencies the College will work with local processes and procedures.

Whilst the Head should ensure that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff, and the Trustees are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Full details of the DSL's role can be found at Annex C of *KCSIE*.

### **'WHISTLEBLOWING' PROCEDURE / CONCERNS ABOUT SAFEGUARDING PRACTICES IN THE COLLEGE**

All staff (including Trustees, supply staff, agency staff and volunteers) should be aware of their duty to raise concerns, where they exist, about the management of Child Protection in College, which may include the attitude or actions of colleagues. The College aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'.

If staff have safeguarding concerns about another staff member (including supply staff, agency staff, volunteers and contractors), then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Trustees. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, agency staff, volunteers, and contractors) and refer the matter directly to the LADO.

Where staff have concerns about poor or unsafe practices and potential failures in the College's safeguarding systems, these should be raised in accordance with the College's whistleblowing procedures. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

Where a staff member or volunteer feels unable to raise an issue with the College or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them; see Whistleblowing Policy.

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

See link: [NSPCC Whistleblowing Advice Line](#)

## **CHILD PROTECTION PROCEDURES AND GUIDANCE (INCLUDING TYPES OF ABUSE)**

### **Definitions of Safeguarding and Types of Abuse**

#### **What is Safeguarding?**

Safeguarding and promoting the welfare of children is defined as providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes

#### **What is Child Protection?**

Child Protection is one very important aspect of safeguarding. It refers to the activity which is undertaken to protect children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

#### **What is Significant Harm?**

The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention by statutory agencies in family life in the best interests of children. There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes it might be a single traumatic event but more often it is a compilation of significant events which damage the child's physical and psychological development. Decisions about significant harm are complex and require discussion with the statutory agencies.

#### **Scope and Purpose of these Procedures**

These procedures apply to the Trustees, Heads, all staff (including supply and peripatetic staff), agency staff and volunteers working for and on behalf of Wycliffe and explain what action should be taken if there are concerns that a child is, or might be, suffering harm. A child includes everyone under 18 years, but the principles of these procedures apply also to vulnerable young adults over 18 years.

As well as this policy, the College has extensive arrangements to fulfil other Safeguarding and Welfare policies and procedures including Early Help Strategies within the pastoral system.

#### **What Constitutes Child Abuse?**

All College staff should be aware that abuse, neglect, exploitation 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. Therefore staff should always be vigilant and always raise any concerns with the DSL or DDSL. The [NSPCC](#) website provides useful additional information on abuse and neglect and what to look out for, in addition to [What to do if you're worried a child is being abused](#). 'What College and College staff should look for' can be found in Keeping Children Safe in Education.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. They may be abused by an adult or adults, or another child or children. Please consider that an abuser could also be female. Children may be abused in a family (e.g. witnessing domestic violence) or in an institutional community setting by those known to them, or, more rarely, by others (e.g. via the internet). 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.

Abuse can be:

- physical abuse;
- emotional abuse;
- sexual abuse; and/or
- neglect.

Staff in the College are alert to the possible indications or signs of possible abuse, which may include:

- Signs of looking unwashed, undernourished, weight loss etc; inappropriate clothing for the conditions;
- Changes in behaviour – depression or withdrawn behaviour or attention needing behaviour;
- Fearful behaviour - fear of specific people places, fear of separation etc.;
- Mentioning being left alone or unsupervised;
- Regressive or aggressive behaviour e.g. bed-wetting or severe temper outbursts that are out of character;
- Mood swings;
- Changes of friendship group;
- Persistent or multiple bruising in unexpected places, that cannot be explained by normal childhood activity;
- Minor injuries in unlikely places;
- Burns, scalds or bites;
- Delay in seeking access to medical care/treatment;
- Excessive preoccupation with sexual matters;
- Knowledge of sexual matters inappropriate for age of child;
- Sexually explicit or otherwise disturbing creative writing or artwork;
- Expression of opinions that are at odds with the College's shared values, and which may be tantamount to, or explicitly inciting violence and/or illegal acts.

The above list is by no means exhaustive, and it is important to be aware that there may be other circumstances, not amounting to abuse, which give cause for serious concern about the welfare of pupils. Questions of the young person being in moral danger, being uncared for, engaging in antisocial or inappropriate behaviour and so on may be referred to the Section DSL, who will discuss the matter with the College DSL and the Heads, and, as necessary, to Children's Social Care. Such cases may also be referred to the College's Health Centre and through them to Children's Social Care. Staff are well advised to look beyond the setting - what is happening in other areas of the child's life?

Staff are referred to Appendix II of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as:

- Sexual harassment and sexual violence
- Harmful sexual behaviour
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- County Lines
- Sharing of nudes and/or semi-nudes
- Upskirting
- Serious violence
- Cybercrime
- Modern Slavery
- Homelessness
- Mental health
- 'Honour based' abuse
- Children who are absent from school
- Child abduction and community safety incidents
- Children and the court system

- Children with family members in prison

Concerns regarding any of the above safeguarding issues should be reported using the procedures set out in this policy. Alternatively, staff should first discuss their concerns with the Section DSL or College DSL who will consider the appropriate course of action. Staff should not assume that someone else will act; safeguarding is everyone's responsibility.

### **PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD**

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

All staff should:

- listen carefully;
- avoid asking leading questions;
- observe their behaviour;
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe;
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report;
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken;
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns;
- determine how best to build trusted relationships with children and young people which facilitate communication.

All concerns, discussions, and decisions (including the rationale for those decisions) made under these procedures should be recorded in writing on CPOMS. This includes instances where referrals were or were not made to another agency, such as Children's Social Care or the Prevent Programme. This will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome.

The record should include the date, time and place of the conversation, or incident, and detail of what was said and done by whom and in whose presence. The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of *KCSIE*.

Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy).

Where there is a safeguarding concern, the College will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The College manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The College implements a child-centred approach to safeguarding. Whilst the College is committed to working collaboratively, and in partnership, with parents and carers, as far as possible, the wishes and

feelings of the child and what is in their best interest is always central to the College's decision-making process.

## **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, but especially the DSLs, and any deputies, should consider the context within such incidents and/or behaviours occur. The College will, as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The College will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

### **What staff should do if they have concerns about a child**

If staff (including Trustees, supply staff, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the College's DSL to agree a course of action, although staff can make a direct referral to Children's Social Care. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe; they should maintain an attitude of "it could happen here". If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press Children's Social Care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and Children's Social Care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

### **What staff should do if a child is in danger or at risk of harm**

If staff (including Trustees, supply staff, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to Children's Social Care and/or the Police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the Police and Children's Social Care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and Children's Social Care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

Contact details for Gloucestershire Safeguarding Children Partnership can be found in Appendix VI.

### **Concerns Regarding a Pupil's Mental Health**

The College has an important role to play in supporting the mental health and wellbeing of its pupils. 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.

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.

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. Staff have access to a range of advice to help them identify children in need of extra mental health support,

this includes working with external agencies. More information can be found the DfE's [Mental health and behaviour in schools guidance](#).

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 a Section DSL/DDSL or the College DSL.

### **Preventing Radicalisation of a Pupil**

Protecting children from the risk of radicalisation should be seen as part of College's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

Further information regarding radicalisation, extremism and terrorism, including definitions, can be found at Appendix II.

Staff should follow the College's normal referral processes when there are concerns about children who may be susceptible to extremist ideology and radicalisation in to terrorism. This may include a Prevent referral or referral to Children's Social Care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999.

The College, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out risk assessments (following consultation with local partners, such as the Police) which assess how their learners or staff may be at risk of being radicalised into terrorism, including online. Such risk assessments are discussed with the Head, the DSLs and the Safeguarding Trustee to ensure that the College's safeguarding arrangements are sufficiently robust to ensure those at risk of radicalisation are identified and appropriate support is provided and is regularly revised as needed.

### **Risk of Involvement with Serious Violent Crime**

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

### **Discovered Cases of FGM**

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out on a pupil. Unless the member of staff has good reason not to, they should still consider and discuss any case with a Section DSL or the College DSL and involve Children's Social Care as appropriate. Staff are referred to Appendix II of this policy for more information on FGM, including the procedures to be followed where a child is suspected to be at risk of FGM.

### **Incident of Nudes and Semi-nudes being shared by Pupils**

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child. Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable



and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the Section DSL or the College DSL as soon as possible.

The DSL, and any deputies, will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (2024) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns;
- Carrying out interviews with the children involved (if appropriate);
- Informing parents and carers at an early stage and keeping them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform the parents and carers should be made in conjunction with other services such as Children's Social Care and/or the Police, who would take the lead in deciding when they should be informed;
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process.

An immediate referral to police and/or children's social care through the MASH or equivalent will be made if any of the following points apply:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- The images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent.
- The images involves sexual acts and any child, or young person in the images or videos is under 13.
- There is reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming.

If none of the above apply, the College may decide to respond to the incident without involving the police or children's social care. All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. The decision to respond to an incident without involving the police or children's social care will only be made in cases where the DSL (or equivalent) is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the College's pastoral support and disciplinary framework. Any decision in this regard will be made by the DSL (or equivalent) with input from the Head. The decision will be made and recorded in line with this Policy and will be based on consideration of the best interests of any child or young person involved. Any decision will take into account proportionality as well as the welfare and protection of any child or young person. The decision will be reviewed throughout the process of responding to the incident. If doubts remain local safeguarding arrangements will be followed.

Records will be kept in line with statutory requirements set out in KCSIE and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should

notify the Section DSL or the College DSL immediately, who should always inform the Police as a matter of urgency.

### **Children with Special Educational Needs**

Children with Special Educational Needs and Disabilities (SEND) and certain health conditions can face safeguarding challenges and are three times more likely to be abused by their peers. Staff need to be aware of additional barriers that these children face, such as communication barriers (including reporting concerns and abuse), that they may be disproportionately impacted by behaviours such as bullying without displaying symptoms and assumptions that indicators of possible abuse such as behaviour, mood, injury relate to the child's disability without further explanation.

There is a concern sometimes that, for children with SEND, their SEND needs are seen first, and the potential for abuse second. The EHA (Early Help Assessment) Tool should be used where the root causes of abuse may be underlying and beyond SEND issues and behaviour.

### **Looked after Children**

The most common reason for children becoming looked after is as a result of abuse and neglect. The College will ensure that staff have the necessary skills and understanding to keep looked after/previously looked after children safe.

The Trustees ensure that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

The College/Section DSL is the designated member of staff who has responsibility for their welfare and progress. When it becomes necessary, the College ensures that the designated member of staff receives appropriate training in order to carry out their role.

### **Children Absent from Education**

Children who are absent from education, particularly on repeat occasions and/or for prolonged periods, and children missing education can act as a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is important that the College's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. The College's procedures for unauthorised absence and for dealing with children who are absent, repeatedly and/or for prolonged periods, and children missing from education are detailed in the College Attendance Policy and Missing Pupil Policy.

The Missing Pupil Policy ensures that all measures are taken to monitor attendance and provide guidance to all staff when a pupil is missing from lessons or house. In addition, Wycliffe is cognisant of the 'Statutory guidance on children who run away and go missing from home or care' - January 2014 and Working Together to Safeguard Children and all matters of this type are referred to the College DSL or Section DSL, who will liaise with the appropriate Head in each case.

Where reasonably possible, Wycliffe will hold more than one emergency contact for each child, with two being the expected level of contact including phones and emails, to provide the College with additional options to make contact with a responsible adult particularly when a child who is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safeguarding concern.

The College will report to the Local Authority a pupil who fails to attend school regularly or has been absent from school without the College's permission for a continuous period of 10 school days or more. Further details are available in the Attendance Policy.

When working with local authority children's services where school absence indicates safeguarding concerns the College will have regard to the DfE guidance *'Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (February 2024)*.

### **Safeguarding Concerns for Children who Move School or 'Disappear'**

If a non-UK national is missing from education and they have a Child Protection plan in place we will endeavour to pass on the information to the appropriate authorities

In addition, the UK Visa and Immigration service will be informed in line with Tier 4 Pupil Sponsor procedures where appropriate.

See the link below for further guidance: [Children missing education - Statutory guidance](#)

### **Children with a Social Worker**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the DSLs will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorized absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

### **Lesbian, gay, bisexual or gender questioning**

A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a pupil who is perceived by their peers to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

When supporting a gender questioning child, the College will take a cautious approach and consider the broad range of the pupil's individual needs, in partnership with the parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The College will adopt (to the extent that it is reflected in *KCSIE*), the draft DfE guidance for schools and colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where children lack trusted adults with whom they can be open. The College endeavours to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

### **Close 1:1 Teaching**

For example, in 1:1 teaching in Performing Arts or Specialist Sports Coaching, refer to Staff Code of Safe Practice for Staff for advice on policy and procedures.

## **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 (Early Help).

Any child may benefit from Early Help but all staff should be particularly alert to the potential need for Early Help for a child who:

- Is disabled or has certain health conditions and has specific additional needs;
- Has special educational needs (whether or not they have a statutory education, health, and care plan);
- Has a mental health need;
- Is a young carer;
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- Is frequently missing/goes missing from education, from care or from home;
- Has experienced multiple Fixed-Term Exclusions, is at risk of being Permanently Excluded from schools, or in an Alternative Provision or Pupil Referral Unit;
- Is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking, or sexual or criminal 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;
- Has a family member in prison, or is affected by parental offending;
- Is experiencing, or is at risk of experiencing, family ostracism;
- Is at risk of 'honour-based abuse' such as FGM or Forced Marriage;
- Is a privately fostered child;
- Is absent from education, particularly on repeat occasions and/or prolonged periods including persistent absences for part of the school day.

Early help is support for children of all ages that improves resilience and outcomes or reduces the chance of a problem getting worse. Early help may be appropriate for children who have several needs, or whose circumstances might make them more vulnerable.

The College has effective measures in place to identify emerging problems and potential unmet needs of individual pupils. All staff undertake appropriate training to ensure that they know when to share information with other agencies and what action to take to support early identification and assessments.

In the first instance, staff who consider that a pupil may benefit from Early Help should discuss this with the College DSL or Section DSL. The College DSL or Section DSL will consider the appropriate action to take in accordance with local procedures. Where appropriate, the DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment.

If Early Help is appropriate, the matter will be kept under review and consideration given to a referral to Children's Social Care if the pupil's situation does not appear to be improving.

**PROCEDURES FOR DEALING WITH ALLEGATIONS OF CHILD-ON-CHILD ABUSE  
(INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)**

Child-on-child abuse is abuse by one or more children against another child or children. It can be standalone or as part of wider abuse and can happen both inside and outside of the College, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sharing nudes and semi-nudes, sexual assault, gender-based issues and sexual behaviours including child on child sexual violence and sexual harassment, causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves disciplinsexually, or to engage in sexual activity with a third party. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

These arrangements apply to all reports and concerns of child-on-child abuse, whether they have happened in College or outside of it, and/or online. Abuse that occurs online or outside of College should not be downplayed and should be treated equally seriously.

All staff must maintain an attitude of 'it could happen here'. When there are reports of child-on-child abuse the College DSL or Section DSL will meet with appropriate staff following advice from Children's Social Care and coordinate the matters in line with guidance from GSCP and ISI. The College DSL or Section DSL will:

- Follow procedure and refer to the MASH Team
- Ensure secure supervised spaces for all involved
- Involve the other (D)DSLs as appropriate
- Follow guidance above with respect to each pupil in a secure supervised environment
- If a pupil appears injured and/or distressed in anyway then medical attention may need to be received

Practical and up to date support and information can also be found on [NSPCC](https://www.nspcc.org.uk) or via the [www.gov.uk](https://www.gov.uk) website

If there is an allegation against a person outside the College community, the College DSL or Section DSL will seek advice from external agencies and contact the parents as and when appropriate.

Please see the separate Child-on-Child Abuse Policy (APPENDIX VII) for the College's procedures in managing allegations and incidents of child-on-child abuse. The Child-on-Child Abuse Policy applies to all reports and concerns of child-on-child abuse, whether they have happened in College or outside of it, and/or online.

**ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR  
ALLEGATIONS OF ABUSE BY A MEMBER OF STAFF  
(INCLUDING SUPPLY STAFF, TRUSTEES, VOLUNTEERS AND CONTRACTORS)**

The College's procedures for managing concerns or allegations against staff (including supply staff, and volunteers and contractors) who are currently working in the College whether in a paid or unpaid capacity follows the DfE's statutory guidance and the Gloucestershire Safeguarding Children Partnership's arrangements and applies when staff (including volunteers) have (or are alleged to have):

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm if they were to work regularly or closely with children; and/or

- behaved or may have behaved in a way that indicates they may not be suitable to work with children including behaviour that may have happened outside of College.

In this section references to 'allegations' also cover concerns. Allegations that do not meet the above harms test should be dealt with using the College's procedure for handling low level concerns set out below.

If an allegation is made against anyone working with children in the College, then the quick resolution of that allegation will be a clear priority as this is a benefit to all concerned. Any unnecessary delays should be eradicated. The Head should be informed at the earliest opportunity.

Before contacting the LADO, the College may conduct a basic enquiry, in line with local procedures, to establish the facts in order to determine whether there appears to be any foundation to the allegation. The College will not undertake their own investigation of the allegation/s without prior consultation with the LADO or, in the most serious cases, the Police, so as not to jeopardise statutory investigations.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with Children's Social Care and the Police.

If an allegation is made against a member of staff, the College will apply common sense and judgement, it must be responded to quickly, fairly and consistently and with the utmost discretion to ensure protection for the child and support for the person who is the subject of the allegation.

The College has a duty of care to its staff, and whilst the welfare of a child is paramount, the College must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The College will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Allegations which appear to meet the above reporting criteria are to be reported straight away to the 'Head'. Where the Head the subject of the allegation, reports should be made to the Chair of Trustees. The Head must not be informed of the allegation prior to contact with the Chair of Trustees and LADO. Staff may consider discussing any concerns/allegations with the DSL.

The informant should be told that the matter will be referred in confidence to the appropriate people. The circumstances should be kept strictly confidential until the relevant Head has been able to judge whether or not an allegation indicates possible abuse. The 'Case Manager' (the Head, or may be delegated to the DSL) will discuss the concerns with the LADO for allegations management ([Role of the LADO & the Allegations Management process](#)) and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the Head deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the Head should contact Children's Social Care and as appropriate the Police immediately.) The LADO should be informed within one working day of all allegations that come to the College's attention and appear to meet the criteria or that are made directly to the Police and/or Children's Social Care. The College DSL is responsible for ensuring the child is not at risk.

Where the Head/College DSL is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to Children's Social Care.

All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed.

Allegation management referral form: [Allegation Management Referral Form](#).

If it is decided by the LADO that an investigation is called for, a Strategy Meeting will be called by a Manager or the LADO at GSCP. This would normally involve the Police, Children's Social Care or the LADO, and the relevant Section DSL or College DSL.

Where a member of Boarding Staff is suspended pending an investigation of a child protection nature, alternative accommodation (away from children) will be arranged.

If the allegation made to a member of staff concerns a Head, the person receiving the allegation will immediately inform the Chair of the Council of Trustees, without prior notification to the Head. If the allegation concerns a Section DSL and/or the College DSL, then the relevant Head must be informed.

If the allegation is made against a volunteer, a supply teacher, contractor etc, an investigation will necessarily involve the organisation or agency of employment. For those who are self-employed the allegation will be passed directly to GSCP or LADO for advice or action, dependent upon whom the allegation is made against.

When to inform the individual who is subject to the allegation will be considered on a case by case basis and with guidance from the LADO, and if appropriate, the Police and/or Children's Social Care. Subject to any objection, the Case Manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The Case Manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

Where further enquiries are required to enable a decision about how to proceed, the LADO should discuss with the relevant Case Manager how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the College to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the College. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.

Where initial discussions lead to no further action, the relevant DSL and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

The Case Manager will give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the College or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered before suspending a member of staff:

- redeployment within the College so that the individual does not have direct contact with the child or children concerned;
- providing an assistant to be present when the individual has contact with children;
- redeploying to alternative work in the College so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted, or;

- temporarily redeploying the member of staff to another role in a different location, for example to an alternative College where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the College is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The College will give due weight to the views of the LADO, Working Together to Safeguard Children and KCSIE when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the Case Manager will confirm the decision within one working day and will ensure they know who their point of contact is in the College and shall provide them with their contact details. The Case Manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

The Case Manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from Children's Social Care or the Police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.

The Case Manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.

The College will discuss with the LADO whether a referral to the DBS or Teaching Regulation Agency (TRA) should be made where an allegation is substantiated and the person is dismissed or the College ceases to use their services, or the person resigns or otherwise ceases to provide their services. The College has a legal obligation to report promptly to the DBS any person (whether employed, contracted, a volunteer or a pupil) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the College must consider making a referral to the TRA and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence). Advice about whether an allegation against a teacher is sufficiently serious to refer to TRA can be found at: [Teacher misconduct: the prohibition of teachers.](#)

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with KCSIE and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether



the information will be referred to in any future reference. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA"). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer. Records should be reviewed at the end of the retention period in case it is necessary to keep it for longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. Any repeated concerns or allegations which do not meet the harm threshold which have all been found to be false, unfounded, unsubstantiated or malicious should not be included in any reference.

If an allegation is shown to be deliberately invented or malicious, the relevant DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Children's Social Care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the College's Behaviour Policy; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the College will make a serious incident report to the Charity Commission whenever the Charity Commission's guidelines deem it appropriate to do so.

On conclusion of the case, the College will review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the College's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the Head (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the College will make a referral to the DBS.

### **Arrangements for Dealing with Safeguarding Concerns or Allegations of Abuse About Supply Staff and Contracted Staff**

The College's procedures for managing allegations against staff above also apply to staff not directly employed by the College, for example, supply teachers provided by an employment agency or business ('the agency'). The College will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, Police and/or Children's Social Care.

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 LADO to determine a suitable outcome. The College will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher or redeploy them to another part of the College, whilst they carry out their investigation.

The College will advise supply teachers being investigated 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, the College should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first, the College must consider whether to refer the case to the Secretary of State (via the TRA).

### **DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT ORGANISATIONS OR INDIVIDUALS USING COLLEGE PREMISES**

The College may receive an allegation or concern relating to an incident that happened when an individual or organisation was using the College premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the College will follow their safeguarding policy and procedures, including informing the LADO.

When services or activities at the College are provided under the direct supervision or management of College staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the College, the College will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the College will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the College on these matters where appropriate. The College will expect, where appropriate, providers to fully comply with the DfE guidance *After school clubs, community activities, and tuition (safeguarding guidance for providers) (September 2023)* and will seek assurance in this regard.

The College has arrangements in place for the use of College premises for non-College activities including the availability of the DSL or DDSL and how they can be contacted.

#### **Good Practice Recommendations for Record Keeping will involve:**

- Ensuring that a proper record is kept of any Child Protection referral and action taken, and that this is kept securely and in confidence.
- Child Protection records should be kept for the approved timescale for the various Authorities the College works in conjunction with and then shredded on the basis that this information has been shared with Children's Social Care who will continue to hold copies.
- Preference is to send over CPOMS record, with any paperwork scanned and attached, but if there are paper notes dispatched to another school, we must ensure that the original copies are held and that photocopies are dispatched with notes and records of delivery i.e. special delivery / recorded delivery.

New children have their old school approach to transfer any child protection files securely and also a proactive approach to ensuring sufficient support and cascading of information in place for key staff

#### **Low level Staff Concerns or Allegations (that do not meet the harms test) About Teachers and Other Staff (including the Head, Trustees, Supply Staff, Volunteers and Contractors)**

A low-level concern is any concern that an adult working in or on behalf of the College may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The College takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the College's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.

For concerns regarding staff (including the Heads, Trustees, supply staff, volunteers and contractors) that do not meet the harms threshold should be dealt with using the College's Low Levels Concerns Policy in Appendix III of this policy. The Head is the ultimate decision-maker in respect of all low-level concerns.

The Staff Code of Safe Practice provides clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this policy at all times.

### **STATEMENT ON CONFIDENTIALITY**

The management of confidentiality is an essential factor in all issues relating to Child Protection.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* supports staff who have to make decisions about sharing information. The Trustees recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the College and with local authority Children's Social Care, the safeguarding partners and other organisations, agencies, and practitioners as required.

Fears regarding sharing information under the Data Protection Act 2018 and the UK General Data Protection Regulation ("UK GDPR") should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL").

Staff should never give pupils or adults an absolute guarantee of confidentiality but must ensure that the information is disclosed only to the people who need to know.

It should be explained to children and young people that secrets cannot and should not be kept if keeping them means that they, or others, will continue to be harmed. Advice should be sought from the College DSL or Section DSL who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principal that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority Children's Social Care; and whether a crime has been committed. Ultimately, the DSL will balance the victim's wishes against their duty to protect the victim and other children.

Normally, personal information should only be disclosed to third parties (including other agencies) with the consent of the subject of that information or where there is another lawful basis to do so (UK GDPR, Data Protection Act 2018). Wherever appropriate, consent should be obtained before sharing personal information with third parties. In some circumstances, obtaining consent may not be possible or be in the best interests of the child, for example, where safety and welfare of that child necessitates that the information should be shared. The law permits the disclosure of confidential information necessary to safeguard a child or children. Disclosure should be justifiable in each case, according to the particular facts of the case, and legal advice should be sought if in doubt. The College will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data';
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child at risk;
- not providing pupils' personal data where the serious harm test is met.

## **POLICY ON SAFEGUARDING AND ICT**

The College has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the College's IT system. The College's system for filtering and monitoring is Securly.

Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images.

The College recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at College undetected.

The College ensures compliance with the DfE's 'filtering and monitoring standards for College's by;

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing the filtering and monitoring provision at least annually.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

## **Safeguarding and ICT Guidelines**

Protecting young people in the online world means thinking beyond the College environment. With the advance of Internet technology, pupils increasingly will have access to personal devices not covered by College network protection and the College recognises that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) The College's emphasis therefore is on educating all users as to the risks involved and their obligation to act responsibly whilst online, both inside and outside of the College.

Safeguarding pupils in both the real and virtual world is the responsibility of all staff. Staff and the Trustees must be familiar with these guidelines and understand how to respond to online incidents even when online at home. Staff need to be vigilant for threats of radicalisation on line as well as cyber bullying, grooming, online abuse or any other safety issues. Pupils will be taught through the curriculum, including Lifeskills, and other pastoral support systems how to behave and build resilience in dealing with such matters.

All pupils should be made aware of the Wycliffe College Pupil Acceptable ICT Use Policy and what to do if they have any ICT safeguarding concerns. Other College policies and procedures relating to mobile devices and Social Media also needs to be consulted. The IT Services Manager, and other key personnel may also be consulted. The College recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children or children with certain health conditions might be needed.

Online safety is revisited regularly through the Lifeskills programme, and in ICT lessons up to Year 9 for all pupils.

The College will liaise with parents to reinforce the importance of children being safe online and the systems the College uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will ask to access and who from the College their child is going to be interacting with online.

#### **Procedures for dealing with inappropriate/illegal internet access or material**

Wycliffe has installed robust web filtering software which will be kept under review by the Operations Manager to ensure the protection of its pupils whilst accessing the Internet using the College's IT system. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images. It is recognised however that no software is infallible, and the following procedures will be abided by where necessary. These systems will also be reviewed periodically by Trustees to ensure they understand the system that is in place and staff are aware how to escalate concerns.

Discovery of inappropriate websites, by staff or pupils, should be reported immediately to the relevant DSL, who in liaison with the IT Services Manager will consider referral to [Child Exploitation and Online Protection command](#) and the Police.

Illegal material accessed within the College's network is a very serious situation and must always be reported to the Police. Any incident that involves inappropriate adult access to legal material on the College's premises will be dealt with by the College's Behaviour Policy, in conjunction with the Police where appropriate.

#### **Action in the Event of Discovery of Illegal Material:**

- seek immediate and specific advice from the College DSL or Section DSL who will consult with the IT Services Manager, the relevant Head and the Police;
- prevent any further access to the device/network location until the correct advice is gained;
- **unless absolutely necessary, DO NOT delete the material or remove the power from a working device and under no circumstances start a device if it is already switched off;**
- consider if it is necessary to prevent remote access to the device/network location;
- if it is believed that a member of staff or pupil who has left the site, could remove or damage evidence on the device remotely, unplug **ONLY** the network cable from the back of the device to

prevent this access from occurring, ideally consulting with the IT Services Manager before doing so;

- if the device is already turned off and it is no longer realistically possible to prevent further physical access (i.e. due to lack of supervision, high levels of access or an unoccupied location) disconnect the power at the base unit (not the wall) and remove the laptop. Store this device securely in a location where no one else can gain access to it and make a note of the date, time and name of the individual who performed this action.

**Under no circumstances should any member of staff attempt to conduct an investigation of their own or bring in an outside expert to do so as this may compromise the evidence if a legal case were to result. In some cases, this may constitute a criminal offence in itself.**

Further information regarding Safeguarding and ICT can be found in [Keeping Children Safe in Education](#)

### **GUIDANCE ON SHARING NUDES AND SEMI-NUDES**

Details of how the College responds to incidents of sharing nudes and semi-nudes can be found at the following link:

[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

### **WORK EXPERIENCE/HOST FAMILIES**

These are Special Circumstances

[Keeping Children Safe in Education](#)

- See Annex D

This needs to be run in conjunction with the College's Policies and procedures for work experience, volunteers policy and overseas trips and tours:

- Work Experience Procedure
- Volunteers Policy
- Overseas Trips and Tours Policy

### **POLICY ON KEEPING STAFF SAFE**

Wycliffe is committed to ensuring that relationships between staff and pupils are conducted on a professional basis. Anticipation of possible risks and seeking to prevent all reasonable risk of misunderstandings and false allegations are seen as part of this commitment.

Good practice includes valuing and respecting children as individuals and the adult modelling of appropriate conduct – please refer to the Staff Code of Safe Practice. **It is recognised that it is the action rather than the intention that may subsequently give rise to problems.**

**It is important for all staff (including Trustees, supply staff, agency staff and volunteers) to:**

- comply with the Staff Code of Safe Practice at all times;
- be mindful of safe working practices and alert to situations which may present risks and manage these;
- ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour does not go unchallenged;
- empower children – discuss with them their rights and responsibilities, what is acceptable and unacceptable, and what they can do if there is a problem.

The principle is that staff should avoid actions or behaviour which may constitute poor practice or potentially abusive behaviour or be open to misinterpretation. The Staff Code of Safe Practice contains further information about the standard of appropriate behaviour of staff at the College.

If a member of staff believes that an action could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard, the member of staff should self-refer under the College's Low Level Concerns Policy set out in this policy (including at Appendix III) and record the incident and circumstances in writing on CPOMS as soon as possible. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

### **EARLY YEARS FOUNDATION STAGE (EYFS) ADDITIONAL SAFEGUARDING ARRANGEMENTS**

#### **Early Years DSL**

The Early Years DSL is Mr David Aherne - telephone 01453 820475

#### **Disqualification From Working in Childcare**

Where staff work in, or are involved in the management of, the College's early years or provision of care of pupils under the age of eight, the College will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the College's safer recruitment practices, further details of which can be found in the College's Recruitment, Selection and Disclosures Policy & Procedure.

The College records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the College will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the College will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

#### **Use of Mobile Phones and Cameras**

EYFS and Pre-Prep staff are not allowed to use personal devices such as phones, cameras or recording equipment to capture or record the pupils. They are not to be taken into classrooms and must only be used in designated staff areas. This is done with the sole intention of protecting our children from harm.

It is always recommended as good practice that all staff, where possible, only use Wycliffe owned devices to take photographs or record children.

#### **Duty to Notify Ofsted**

The College will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the College is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the College became aware (or ought reasonably to have become aware) of it.

The College will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working, or looking after children at the College premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

### **Arrangements for visiting speakers**

The College has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable, as detailed in the Visitor Policy. The College's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the College and British values.

The College is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the College. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting Speakers, whilst on the College site, will be supervised by a College employee. On attending the College, visiting speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The College shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

### **Arrangements for use of College premises for non-College activities**

When services or activities at the College are provided under the direct supervision or management of College staff, this Policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of the College, the College will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the College will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the College on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the College roll.

The College will ensure that the DSL or DDSL can be contacted and/or is available at all times the College premises is in use, whether that activity is a College or non-College activity and regardless as to whether the children attending are on the College roll.

The College will ensure that safeguarding requirements are included in any agreement for use of the College premises (such as a lease or hire agreement) as a condition of use and occupation of the premises and that failure to do so by the provider to comply with this will lead to termination of the agreement.

When considering the safeguarding arrangements any providers have in place the College will have regard to the DfE's non statutory guidance '*Keeping children safe in out-of-school settings*' (April 2022) and '*After school clubs, community activities, and tuition (safeguarding guidance for providers)*' (September 2023).



### **APPENDIX I – DSL/DDSL ROLE**

The Designated Safeguarding Lead (DSL):

The DSL should take lead responsibility for safeguarding and child protection (including online safety) matters in the College. This should be explicit in the role holder's job description.

The DSL will fulfil the Role of the DSL as detailed in [Annex C of KCSIE](#)

Roles and responsibilities will include:

- **Availability** – being available during College hours for staff to discuss any safeguarding concerns. A cover arrangement will be in place for non-term time
- **Manage referrals** – to e.g. Children's Social Care, Channel programme, Disclosure and Barring service, the Police
- **Working with others:**
  - Act a point of contact with the local Safeguarding Children Partnership
  - Act as a source of support, advice and expertise for staff
  - to promote supportive engagement with parents and/or carers and the SLT/Governing body
  - liaise with the Case Manager and or LADO for child protection concerns in cases which concern a staff member
  - liaise with the Head to inform them of the issues- especially ongoing enquiries under section 47 of the Children Act 1989 and Police investigations.
  - To work collaboratively with key pastoral and medical staff within the College to provide pastoral support to pupils
  - To work collaboratively with the IT Department on matters of online safety, filtering and monitoring
  - To signpost to, and access Early Help support for children and families
- **Information sharing and managing the child protection files**
  - The DSL is responsible for ensuring that child protection files are kept up to date, kept confidential and stored securely
  - Where children leave the College or College (including in year transfers) the DSL should ensure their child protection file is transferred securely to the new College 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.
  - In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new College or College in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the College or College.
- **Raising Safeguarding and Child Protection Awareness**
  - ensure each member of staff has access to, and understands, the College's or College's child protection policy and procedures,
  - ensure each member of staff receives appropriate training as detailed in this policy
  - ensure the College's or College's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
  - ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the College or College in this
  - link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and

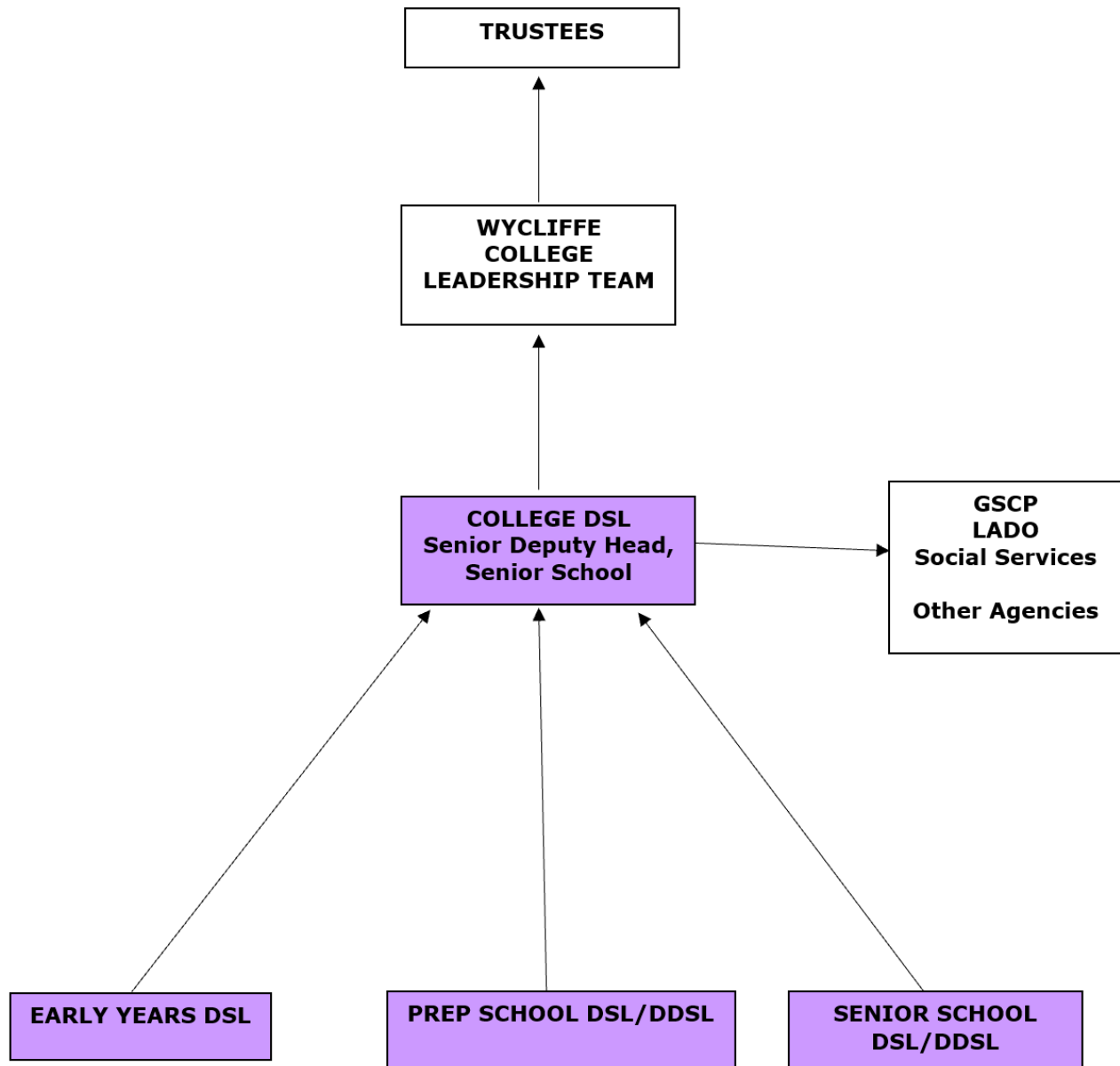
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and College and College leadership
- regularly reviews the College's and their own practices and concerns about welfare and safeguarding matters.
- provide termly updates to the Trustees
- **Updating training, knowledge and skills required to carry out the role of DSL**
  - The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The DSL (and any deputies) should also undertake Prevent awareness training.
  - In addition to the formal training set out in Annex C of KCSIE, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.
  - Providing support to staff
- **Holding and sharing information**
  - The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSIE, and therefore the DSL should be equipped to:
    - understand the importance of information sharing, both within the College and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
    - understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
    - be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping
- **Overseeing and acting upon filtering and monitoring reports and checks to these systems**
- **Understanding the views of children**
  - DSLs (and deputies) should be supported in developing knowledge and skills to: encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the or College may put in place to protect them, and; understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.
- **Monitoring and review of safeguarding practices and procedures**
  - To ensure that the Section 175 Audit published by Gloucestershire Safeguarding Children Partnership (GSCP) is completed annually and returned by deadline and reviewed regularly.

The Deputy Designated Safeguarding Lead/s (DDSL):

Is/are trained to the same standard as the DSL and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL the deputy will assume all of the functions above.

Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSL for the College, this lead responsibility should not be delegated.

**SAFEGUARDING FLOW CHART**



## **APPENDIX II – TYPES OF ABUSE AND SPECIFIC SAFEGUARDING CONCERNS**

All College staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another therefore staff should always be vigilant and always raise any concerns with a DSL.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between children outside of these environments. All staff, but especially the DSLs, should consider whether children are at risk of abuse or exploitation in situations outside their families. This is often referred to as “extra-familial harm”. Extra-familial harm can occur in a range of extra-familial contexts, including in College, peer groups, or within community/public spaces, and/or online. Children may experience this type of harm from other children and/or from adults. Forms of extra-familial harm include exploitation by criminal and organised crime groups and individuals (such as county lines and financial exploitation), serious violence, modern slavery and trafficking, online harm, sexual exploitation, teenage relationship abuse, and the influences of extremism which could lead to radicalisation. Children of all ages can experience extra-familial harm.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

**In all cases, if staff are unsure, they should always speak to a DSL or DDSL.**

**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 (including through corporal punishment). 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 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 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The

sexual abuse of children by other children is a specific safeguarding issue in education. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child-on-child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

Serious bullying may be regarded as emotional, sexual or physical abuse and will be considered under Child Protection Procedures.

**Sexual Harassment:** is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of the College. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

**Sexual violence:** refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

**Child-on-Child Sexual Violence and/or Harassment:** Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same College or college.

**Harmful sexual behaviour:** problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

**Sharing of Nudes and/or Semi-Nudes:** the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming

platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new nude or semi-nude image of a young person
- images created or shared are used to abuse or blackmail peers. Situations could include:
  - children and young people selling nudes or semi-nudes of others online
  - children and young people coercing a peer into sharing a nude or semi-nude to blackmail them for money, further images, or force them into illegal activity
  - children and young people hacking a peer's account to share images more widely without consent to publicly shame
- children and young people create and share a nude or semi-nude with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them.

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (February 2024) sets out the classification of incidents, and how each should be handled.

Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes. Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

**Upskirting:** is a criminal offence and typically involves taking 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. Anyone of any sex can be a victim.

**Domestic abuse:** The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including, but not limited to,

psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. 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.

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

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

College staff can contact Operation Encompass on 0204 513 9990 (08:00 to 13:00, Monday to Friday) for advice in respect of children who have experienced domestic abuse.

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

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

- in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or
- for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or
- through violence or the threat of violence.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines – see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

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

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

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

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

**CSE:** CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16- and 17-year-olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited (e.g. they believe they are in a genuine romantic relationship).

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.



The above CCE indicators can also be indicators of CSE, as can:

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

See :

- [Keeping Children Safe in Education](#)
- [Child sexual exploitation: definition and guide for practitioners \(February 2017\)](#)

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

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

This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and 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 be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

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

**For further information on County Lines:** [Criminal exploitation of children and vulnerable adults: county lines guidance](#)

**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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Serious Violence:** All staff should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained

gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

**Specific Safeguarding Issues:** behaviours linked to drug taking, alcohol abuse, unexplainable and/or persistent absences from education and sharing nudes or semi-nudes put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sharing nudes or semi-nudes and upskirting. Safeguarding issues can also be linked to, for example, children being absent, repeatedly and/or for prolonged periods, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation (FGM); forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sharing inappropriate images; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

**Modern Slavery:** Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "Modern slavery: how to identify and support victims May 2022)".

**Cybercrime:** is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a College's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

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

If there are concerns about a child in this area, a DSL, should consider referring into the Cyber Choices programme. This is a nationwide Police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.gov.uk

**Mental Health:** all staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or 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 attendance and progress at school .

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 a DSL.

The DfE has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting Children and Young People's Emotional Health and Wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol.

**So-called 'Honour Based' Abuse:** Honour based abuse encompasses crimes which have been committed to defend the honour of the family and/or the community, including FGM, forced marriage, and practices such as breast ironing. See Annex B of Keeping Children Safe in Education.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

**Female Genital Mutilation (FGM):** comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. 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. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the toilets due to difficulties urinating
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return
- A pupil is reluctant to undergo medical examination

There is however a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found in Annex B: Further information, of [Keeping Children Safe in Education](#) and the Multi-agency statutory guidance on FGM

There is a statutory duty on teachers to personally 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. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve Children's Social Care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy.

Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence), or it involves a pupil over 18, teachers should follow the College's local safeguarding procedures.

Further guidance can be found at the following link:  
[Mandatory reporting of female genital mutilation: procedural information](#)

**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. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18<sup>th</sup> birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found in the Multi-agency guidelines: Handling cases of forced marriage. Further information on forced marriage is available in guidance published by the Forced Marriage Unit. College staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmf@fco.gov.uk](mailto:fmf@fco.gov.uk).

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBV. Staff recognise they may only have one chance' to speak to a pupil who is a potential victim and have just one chance to save a life.

College is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

**Radicalisation, Extremism and Terrorism:** Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces whether in this country or overseas.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

Prevent Duty guidance: for further education institutions in England and Wales. Staff should contact a DSL, who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

**Special educational needs and/or disabilities (SEND), or pupils with certain health conditions:** Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in College or the consequences of doing so.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with a DSL as appropriate.

**Homelessness:** Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The College should be aware of potential indicators of homelessness including: household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to a DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

**Children who are absent from school:** A child being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education is a potential indicator of a range of safeguarding issues such as abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff must follow the College's procedures for dealing with children who are absent, particularly persistently or for prolonged periods. The College's procedure for dealing with children who are absent and/or missing can be found in the College's Missing Pupil Policy. All unexplained absences will be followed up in accordance with the College's Missing Pupil Policy.

The College shall inform the local authority of any pupil who is going to be added to or deleted from the College's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, or radicalisation

College attendance registers are carefully monitored to identify any trends. The College will inform the local authority of any pupil who fails to attend school regularly or has been absent without the College's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the College and the local authority.

Action should be taken in accordance with this policy if any absence of a pupil from the College gives rise to a concern about their welfare. The College's policy supports identification of abuse and provides preventative measures against the risk of the child going missing in the future. This applies when issues are first emerging as well as where children are already known to the local authority Children's Social Care and need a social worker.

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

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

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

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

**Children and the Court System:** Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5–11-year-olds and 12–17-year-olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The College may refer some parents and carers to this service where appropriate.

**Children with Family Members in Prison:** Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. The Prison Service will undertake a child safeguarding enquiry with children's social care for all sentenced prisoners to identify any who present an ongoing risk to children from within custody. Prisons will also decide on the level of contact, if any, they will allow between a prisoner and a child based on a child contact risk assessment. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **APPENDIX III – CHILD-ON-CHILD ABUSE POLICY**

#### **Introduction**

Wycliffe College fully recognises its duty and responsibility to consider the best interests of its pupils and to safeguard and promote the welfare of the children and young people in our care. We acknowledge that safeguarding is everyone's responsibility. The College adopts a 'whole College' approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

This policy is prepared in accordance with the statutory guidance on child-on-child abuse as set out in Keeping Children Safe in (KCSIE, incorporating the DfE's advice on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (September 2021) , and the procedures and practices of the Gloucestershire Safeguarding Children Partnership (GSCP). This policy should be read in conjunction with the College's Safeguarding and Child Protection Policy.

The Trustees, Senior Leadership Team, and all staff (including supply and agency staff) and volunteers at Wycliffe College are committed to the prevention, early identification and appropriate management of child-on-child abuse (as defined below) both within and beyond the College, including online.

In particular, we believe that in order to protect all of our pupils, all of those who are members of the College community should:

- (a) Be aware of the level and nature of risk to which our pupils are or may be exposed, and put in place a clear and comprehensive strategy which is tailored to their specific safeguarding context;
- (b) Take a contextual whole-College approach to preventing and responding to child-on-child abuse;
- (c) Regard the introduction of this guidance as a preventative measure, and do not feel it is acceptable merely to take a reactive approach to child-on-child abuse in response to alleged incidents of it;
- (d) Recognise national and increasing concern about this issue, and wish to implement this policy in order to ensure that our pupils are safe;
- (e) Encourage parents to hold us to account on this issue, so that if their child is feeling unsafe as a result of the behaviour of any of their peers, they should inform the College so that it can ensure that appropriate and prompt action is taken in response.

This guidance sets out our strategy for preventing, identifying and appropriately managing child-on-child abuse. It applies to all members of the College community and will be reviewed annually to ensure that it continually addresses the risks to which pupils are or may be exposed.

Research has shown that many children who present with harmful behaviour towards others, in the context of child-on-child abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers.

Although the starting point is that the College's response to child-on-child abuse should be the same for all pupils regardless of age, there may be some additional considerations in relation to a pupil aged 18 or over in terms of how local agencies and/or partners respond.

Similarly, the College's response to incidents involving the exchange of youth produced sexual imagery will need to differ depending on the age of the pupils involved (see information on sexual imagery).

#### **What is child-on-child abuse?**

Child-on-child abuse is abuse by one or more children against another child or children. It can be standalone or as part of wider abuse and can happen both inside and outside of the College, and online.

Child-on-child abuse can manifest itself in various ways, including abuse within intimate partner relationships, bullying (including cyberbullying and prejudice-based and discriminatory bullying), hate incidents, racism, misogyny and misandry, physical abuse (such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm), initiation/hazing type violence and rituals, gender-based issues, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, child criminal exploitation, child sexual exploitation, sexual assault, and/or harmful sexual behaviours including child-on-child sexual violence and sexual harassment, 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.

These types of abuse rarely take place in isolation and often indicate wider safeguarding concerns. Any response to child-on-child abuse therefore needs to consider the range of possible types of child-on-child abuse set out above and capture the full context of children's experiences.

This can be done by adopting a **Contextual Safeguarding** approach and by ensuring that our response to incidents of child-on-child abuse takes into account any potential complexity. This policy encapsulates a Contextual Safeguarding approach, which:

- Is an approach to safeguarding children that recognises that safeguarding incidents and/or behaviours can be associated with factors outside the College and can occur between children outside the College;
- Recognises that children's experiences of significant harm in extra-familial contexts, and seeks to include these contexts within prevention, identification, assessment and intervention safeguarding activities. Extrafamilial harms take a variety of different forms and children can be vulnerable to multiple harms including sexual exploitation, criminal exploitation, and serious youth violence;
- Recognises that as children enter adolescence they spend increasing amounts of time outside of the home in public environments (including on the internet) within which they may experience abuse;
- Considers interventions to change the systems or social conditions of the environments in which abuse has occurred. For example, rather than move a child from the College, professionals could work with the College leadership and pupil body to challenge harmful, gendered College cultures, thus improving the pre-existing College environment.

The College acknowledges that even if there have been no reported cases of child-on-child abuse in relation to pupils within the College, such abuse may still be taking place and is simply not being reported. The College will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the College will follow once a report has been made (see below). These procedures will be well promoted in College and in a format that is easily accessible and easily understood by children.

### **When does behaviour become problematic or abusive?**

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

#### *Sexual behaviours*

As the NSPCC explains "children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive. Staff should recognise the importance of distinguishing between problematic and abusive sexual behaviour... As both problematic and abusive sexual behaviours are developmentally inappropriate and may cause developmental damage, a useful umbrella term is harmful sexual behaviours or HSB."

For the purpose of this policy, harmful sexual behaviours are defined as "Sexual behaviours expressed by children that are developmentally inappropriate, may be harmful towards self or others, or be abusive



towards another child or adult." (Hackett, 2014) Hackett also proposed the following continuum model to demonstrate the range of sexual behaviours presented by children, which may be helpful when seeking to understand a pupil's sexual behaviour and deciding how to respond to it. It is vital that professionals consider the continuum in line with children's development. Some behaviours that are considered normative in earlier childhood, may be highly abnormal and inappropriate in adolescence. Similarly, some behaviours that are part of normal adolescent sexual development are highly problematic if expressed by younger children.

Normal	Inappropriate	Problematic	Abusive	Violent
<ul style="list-style-type: none"> <li>• Developmentally expected</li> <li>• Socially acceptable</li> <li>• Consensual, mutual, reciprocal</li> <li>• Shared decision making</li> </ul>	<ul style="list-style-type: none"> <li>• Single instances of inappropriate sexual behaviour</li> <li>• Socially acceptable behaviour within peer group</li> <li>• Context for behaviour may be inappropriate</li> <li>• Generally consensual and reciprocal</li> </ul>	<ul style="list-style-type: none"> <li>• Problematic and concerning behaviour</li> <li>• Developmentally unusual and socially unexpected</li> <li>• No overt elements of victimisation</li> <li>• Consent issues may be unclear</li> <li>• May lack reciprocity or equal power</li> <li>• May include levels of compulsivity</li> </ul>	<ul style="list-style-type: none"> <li>• Victimising intent or outcome</li> <li>• Includes misuse of power</li> <li>• Coercion and force to ensure compliance</li> <li>• Intrusive</li> <li>• Informed consent lacking or not able to be freely given</li> <li>• May include elements of expressive violence</li> </ul>	<ul style="list-style-type: none"> <li>• Physically violent sexual abuse</li> <li>• Highly intrusive</li> <li>• Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour</li> <li>• Sadism</li> </ul>

The Brook Sexual Behaviours Traffic Light Tool can help professionals to identify, understand and respond appropriately to sexual behaviours in children. Staff should always use their professional judgment and discuss any concerns with the Designated Safeguarding Lead (DSL). Where an (alleged) incident involves a report of harmful sexual behaviour (ie those behaviours that are not part of a child's normal sexual development) the incident should be viewed within a child protection context and Children's Services should be contacted to provide assessment and recommendations if more specialist help is need. I

The College will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (2024) when responding to an allegation that nudes and/or semi-nudes have been shared.

*Other behaviour*

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:

- Involves a single incident or has occurred over a period of time
- Is socially acceptable within the peer group
- Is problematic and/or concerning
- Involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability
- Involves an element of coercion or pre-planning

- Involves a power imbalance between the child/children allegedly responsible for the behaviour and the child/children allegedly the subject of that power
- Involves a misuse of power

It should be borne in mind that behaviour which is not abusive at first may potentially become abusive quickly or over time. Intervening early and addressing any inappropriate behaviour which may be displayed by a child is vital and could potentially prevent their behaviour from progressing on a continuum to become problematic, abusive and/or violent - and ultimately requiring (greater/more formal) engagement with specialist external and/or statutory agencies. For example, a physical fight between two children may not constitute child-on-child abuse where the fight is a one-off incident but may be abusive where the child's/children's behaviour subsequently deteriorates into a pattern of bullying behaviour and requires a safeguarding response from a multi-agency partnership - including a statutory assessment of whether this has led, for example, to a risk of significant harm to a child.

The importance of intervening early and addressing any inappropriate behaviour does not just apply on an individual pupil basis but could also apply across the pupil body. Behaviour generally considered inappropriate may in fact indicate emerging concerning behaviour to which the College may need to adopt a whole-College approach in order to prevent escalation and to avoid inadvertently normalising the behaviour.

If there are wider safeguarding concerns relating to the child/children in question, a referral to statutory agencies may be necessary. Where the behaviour which is the subject of the concern(s)/allegation(s) is considered or suspected by the DSL to constitute child-on-child abuse, the College will follow the procedures set out below.

The College's safeguarding team regularly review behaviour incident logs which can help to identify any changes in behaviour and/or concerning patterns or trends at an early stage.

### **How can a child who is being abused by their peers be identified?**

All staff (including Trustees, supply staff, agency staff, and volunteers) should be vigilant in respect of the dynamics of peer groups in their school or college and should be alert to the well-being of pupils and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ. Signs that a child may be suffering from child-on-child abuse can also overlap with those indicating other types of abuse (please see Appendix II for indicators of abuse) and can include:

- (a) failing to attend College, disengaging from classes, or struggling to carry out College related tasks to the standard ordinarily expected;
- (b) running away or regularly going missing from home, care or education;
- (c) being afraid of particular places and/or situations and/or making excuses to avoid particular people;
- (d) physical injuries;
- (e) experiencing difficulties with mental health and/or emotional wellbeing;
- (f) becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much; poor self-esteem
- (g) broader changes in behaviour including alcohol or substance misuse;
- (h) changes in appearance and/or starting to act in a way that is not appropriate for the child's age;
- (i) abusive behaviour towards others.

Abuse affects children very differently. The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present with will depend on their particular circumstances. Rather than checking behaviour against a list, staff should be alert to behaviour that might cause concerns, to use their professional curiosity to think about what

the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour, and, where appropriate, to engage with their parents/carers so that the cause(s) of their behaviour can be investigated.

Where a child exhibits any behaviour that is out of character or abnormal for his/her age, staff should always consider whether an underlying concern is contributing to their behaviour (for example, whether the child is being harmed or abused by their peers, or someone else) and, if so, what the concern is and how the child can be supported going forwards.

The power dynamic that can exist between children is also very important when identifying and responding to their behaviour: in cases of child-on-child abuse, a power imbalance is likely to exist within the relationship. This inequality will not necessarily be the result of an age gap between the child responsible for the abuse and the child being abused. It may, for example, be the result of their relative social or economic status. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others. That said, the College will consider the age and the developmental stage of the child being abused as well as the nature of the allegations and the potential risk of further abuse. In relation to sexual violence and sexual harassment, the College acknowledges that, by its very nature, a power imbalance is likely to have been created between the child responsible for the abuse and the child being abused.

The College recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. The College also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. Staff should be alert to these signs. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff (including Trustees, supply staff, agency staff, and volunteers) are clear on the College's policy and procedures with regards to child-on-child abuse and can recognise the indicators and signs of child-on-child abuse and know how to identify it and how to respond to reports.

### **Are some children particularly vulnerable to abusing or being abused by their peers?**

Any child can be vulnerable to child-on-child abuse due to the strength of peer influence during childhood and adolescence, and staff should be alert to signs of such abuse amongst all children.

Individual and situational factors can however increase a child's vulnerability to abuse by their peers. For example, an image of a child could be shared, following which they could become more vulnerable to child-on-child abuse due to how others now perceive them, regardless of any characteristics which may be inherent in them and/or their family.

Peer group dynamics can also play an important role in determining a child's vulnerability to such abuse. For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable to child-on-child abuse. Children can also be particularly vulnerable to child-on-child abuse in residential settings and are alert to the potential for child-on-child abuse. Pupils will be made aware of the various ways they can alert staff in a residential context e.g. the online 'CONFIDE' system, our Independent Person, the Health Centre team or any adult they feel they can confide in. The College will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding at all times.

The College also recognises that children with special educational needs and disabilities (SEND) or certain health conditions, can face additional safeguarding challenges, are more likely to be abused by their peers, and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The College will consider extra pastoral support for those children.

Children who are questioning or exploring their sexuality, or perceived to be, may also be particularly vulnerable to abuse by their peers.

Research suggests that child-on-child abuse may affect boys differently from girls.

The College also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

### **A whole College approach**

*How can the College raise awareness of and prevent child-on-child abuse?*

The College actively seeks to raise awareness of and prevent all forms of child-on-child abuse by:

- Educating all Trustees, Senior Leadership Team, staff and volunteers, pupils, and parents about this issue.
- Educating pupils about the nature and prevalence of child-on-child abuse via Life Skills lessons, outside speakers and the wider curriculum. Pupils are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. They are regularly informed about the College's approach to such issues, including its zero-tolerance policy towards all forms of child-on-child abuse.
- Engaging parents on this issue by promoting parental sign up to 'Teen Tips' and encouraging parents to hold the College to account on this issue.
- Ensuring that all child-on-child abuse issues are recorded on CPOMS and fed back to the DSL so that they can spot and address any concerning trends and identify pupils who may be in need of additional support.
- Addressing inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive, and/or violent behaviours in the future.
- Challenging the attitudes that underlie such abuse (both inside and outside the classroom). Abusive comments and interactions will never be passed off or dismissed as "banter" or "part of growing up", nor will harmful sexual behaviours including sexual comments, remarks and jokes and online sexual harassment be dismissed as the same, or as "just having a laugh" or "boys will be boys". Staff will also challenge physical behaviours (that are potential criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risk normalising them.
- Supporting and promoting the on-going wellbeing and mental health of pupils by drawing on multiple resources that prioritise pupil wellbeing, resilience and mental health, and by providing in-College counselling to address underlying mental health needs.
- Working with Trustees, Senior Leadership Team, all staff (including supply and agency staff) and volunteers, pupils and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the College community.
- Creating conditions in which our pupils can aspire to and realise safe and healthy relationships.
- Creating a culture in which our pupils feel able to share their concerns openly, in a non-judgmental environment, and have them listened to.
- Responding to cases of child-on-child abuse promptly and appropriately.

### *Multi-agency working*

The College actively engages with its local partners in relation to child-on-child abuse, and works closely with, for example, GCSP and MASH team, Children's Social Care, and/or other relevant agencies, and other schools. The relationships the College has built with these partners are essential to ensuring that the College is able to prevent, identify early and appropriately handle cases of child-on-child abuse.

The College actively refers concerns/allegations of child-on-child abuse where necessary to the relevant agencies listed above. It considers this to be particularly important because child-on-child abuse can be

a complex issue, and even more so where wider safeguarding concerns exist. It is often not appropriate for one single agency to try to address the issue alone – it requires effective partnership working.

**Procedure for responding to concerns or allegations of child-on-child abuse**

A first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of it being a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

In the event of disclosures about child on child abuse, all children involved both alleged victim(s) and alleged perpetrator(s) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the College's Anti-Bullying and Behaviour policies.

If a pupil is in **immediate danger**, or at risk of significant harm, a referral to Children's Social Care (if the pupil is aged under 18) and/or the Police should be made immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made.

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by another child, or children, or that a child may be at risk of abusing or may be abusing other children, they should discuss their concern with the DSL or DDSL without delay so that a course of action can be agreed.

The College will take advice from the local safeguarding partners on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and alleged perpetrator(s).

Confidentiality will be an important consideration for the College and advice will be sought as necessary from the local safeguarding partners, and/ or the Police as appropriate. The College will have regard to the procedures set out in *KCSIE* at all times.

The victim may ask the College not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL (or DDSL) who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principle that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority Children's Social Care; and whether a crime has been committed. Ultimately, the DSL (or DDSL) will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia.

Rape, assault by penetration and sexual assaults will be passed to the Police.

Where a report has been made to the Police, the College will consult the Police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If a referral to Children's Social Care and/or a report to the Police is made against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered.

The DSL may also decide that the children involved may benefit from early help and may make the necessary referral in accordance with the Local Children's Safeguarding Partnership referral process.

These arrangements apply to all reports and concerns of child-on-child abuse, whether they have happened in College or outside of it, and/or online. Abuse that occurs online or outside of College should not be downplayed and should be treated equally seriously.

*How will the College respond to concerns or allegations of child-on-child abuse?*

The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected. In borderline cases the DSL may wish to consult with Children's Social Care and/or any other external agencies to determine the most appropriate response.

Where the DSL considers or suspects that the behaviour in question gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', the DSL should contact Gloucestershire MASH team immediately, and in any event within 24 hours of the DSL becoming aware of it. The DSL will discuss the allegations/concerns with Gloucestershire MASH team and agree on a course of action, which may include:

- (a) Manage internally with help from external specialists where appropriate and possible;
- (b) Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child/children and their family;
- (c) Refer child/children to Children's Social Care for a section 17 and/or 47 statutory assessment;
- (d) Report alleged criminal behaviour to the Police and refer to "when to call the Police guidance" from the NPCC (Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will always be passed to the Police to investigate. Where a report has been made to the Police, the College will consult the Police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. All concerns/allegations will be assessed on a case-by-case basis, and in light of the wider context.) If the College has questions about any Police investigation, it will ask the Police.

A pupil against whom an allegation of abuse has been made may be suspended from the College during the investigation.

If the College is advised to manage the incident internally it will take advice from the GSCP on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and alleged perpetrator(s).

If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the College will ensure that, subject to the advice of the GSCP, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the College and advice will be sought as necessary from the GSCP and/ or the Police as appropriate. The College will have regard to the procedures set out in KCSIE at all times.

*Individual risk and needs assessment*

Where there is an incident of child-on-child abuse, the College will carry out a robust risk and needs assessment and all children involved (both victim(s) and alleged perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed.

These risk assessments will:

- Set out all relevant background information – including an overview of:
  - the context;
  - the specific concern(s) or allegation(s);
  - any relevant detail about the relationships, and any power differentials between the children concerned; and
  - the frequency of the alleged behaviour and any changes in it over time.
- Assess and address the nature and level of risks that are posed and/or faced by the children involved (both victim(s) and alleged perpetrator(s)) and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing College premises (including during any before or after College-based activities), and College transport.
- Draw upon local services and agencies to ensure that the children's needs are met in the long-term.
- Consider whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child involved.
- Consider whether there are risks posed to the victim(s) from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support. Be reviewed at regular intervals in light of the children's on-going needs to ensure that real progress is being made which benefits the children involved. If at any stage the children's needs escalate, the DSL should contact Gloucestershire MASH team to determine the appropriate course of action.
- The College will consider intra familial harms and whether any support for siblings is necessary following an incident.
- Risk assessments should be reviewed on a regular basis, or when there is a material change in circumstance.

Where there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim, especially their protection and support;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the College especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms;
- the time and location of the incident, and any action required to make the location safer

In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The College will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them.

The College will keep a written record of all concerns, discussions and decisions made, and risk assessments will be recorded (written or electronic) and kept under review.

#### *Disciplinary action*

The College will consider whether disciplinary action, in line with the Behaviour Policy, may be appropriate for any child/children involved. Any such action should address the abuse, the causes of it, and attitudes underlying it. Disciplinary action may sometimes be appropriate, including

- (a) to ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour;
- (b) to demonstrate to the child/children and others that child-on-child abuse can never be tolerated; and
- (c) to ensure the safety and wellbeing of other children. However, these considerations must be balanced against the child's/children's own potential unmet needs and any safeguarding concerns.

Before deciding on appropriate action, the College will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it. The College will, where appropriate, consider the potential benefit, as well as challenge, of using managed moves or exclusion as a response, and not as an intervention, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this policy may still be required.

In the event that a report of child-on-child abuse is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help themselves or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Children's Social Care may be appropriate. If a report is however shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the College's Behaviour Policy.

Disciplinary interventions alone are rarely able to solve issues of child-on-child abuse, and the College will always consider the wider actions that may need to be taken by the College, and any lessons that may need to be learnt going forwards.

*On-going proactive work to a contextual whole-College approach*

The College's response to concerns/allegations of child-on-child abuse should be part of ongoing proactive work by the College to embed best practice and take a contextual whole-College approach to such abuse. As such the College's response can become part of its wider prevention work. The College will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the College's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the College will decide on an appropriate course of action.



### **APPENDIX IV - LOW LEVEL CONCERNS POLICY**

The College takes all concerns about safeguarding seriously. The purpose of this 'Low Level Concerns' procedure is to create and embed a culture of openness, trust, and transparency in which the clear values and expected behaviour which are set out in the **Staff Code of Safe Practice** are lived, monitored and reinforced constantly by all staff.

The aim of the Staff Code of Safe Practice is to provide clear guidance about the standards of appropriate behaviour and actions of staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this Staff Code of Safe Practice at all times.

A 'low-level' concern does not mean that it is insignificant. A 'Low Level Concern' is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' that an adult working in or on behalf of Wycliffe may have acted in a way that:

- is inconsistent with our **Staff Code of Safe Practice**, including inappropriate conduct outside of work; and
- does not meet the harm threshold set in KCSIE or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being overly 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
- humiliating pupils

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

#### **Allegation**

Behaviour which indicates that an adult who works with children has:

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

#### **Low-Level Concern**

Does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than a 'nagging doubt' or causing a sense of unease – that an adult working in or on behalf of the College may have acted in a manner which does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO (on a no-names basis if necessary) and which:

- is not consistent with an organisation's Staff Code of Safe Practice, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children

#### **Appropriate Conduct**

Behaviour which is entirely consistent with the organisation's Staff Code of Safe Practice, and the law.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the College; or as a result of vetting checks undertaken.

Staff do not need to be able to determine in each case whether their concern is a 'Low-Level Concern', or if it is in fact serious enough to consider a referral to the LADO or meets the threshold of an allegation. Staff must share all concerns with the Head without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Once staff share what they believe to be a low-level concern, that determination should be made by the Head. The Head is the ultimate decision-maker in respect of all low-level concerns although it is recognised that the Head may wish to consult with the DSL and take a more collaborative decision-making approach. The LADO can be contacted for advice to establish if it meets the threshold for their involvement. The LADO contact details are 01452 426994. Any investigation of low-level concerns should be done discreetly and, on a need-to-know basis.

Where a low-level concern is raised about the Head, it should be referred to the Chair of Trustees. Staff are also encouraged to self-refer in the event they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the Head will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The College will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing and stored securely. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. The information will be retained for seven years from the date of the low-level concern or until the individual has left employment, whichever is longer.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance. However, where a low-level concern (or group of concerns) meets the harm threshold for referral to the LADO and is found to be substantiated, it will be referred to in a reference.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified. If the College is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult with the LADO and take a more collaborative decision-making approach.

The College will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the College's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the College will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will the

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follow the above procedure and refer the matter to the LADO.

**Low-Level Concern Form**

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult working in or on behalf of the College may have acted in a manner which:

- is inconsistent with the College’s Staff Code of Safe Practice, including inappropriate conduct outside of work, and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

The record should be signed, timed and dated.

Please see the Low-Level Concerns Policy for information on how information on this form will be handled.

**Details of concern**

<b>Name of staff member:</b>		<b>Department &amp; Role:</b>	
<b>Signed:</b>		<b>Time &amp; Date:</b>	
<b>Received by</b>	<b>At: (Time)</b>	<b>On: (Date)</b>	
<b>Action Taken: (Specify)</b>			

**APPENDIX V - CHILDREN ACT SECTIONS 17 AND 47**

**Section 17**

17 Provision of services for children in need, their families and others.

[Children Act 1989 - Section 17](#)

**Section 47**

47 Local authority's duty to investigate.

[Children Act 1989 - Section 47](#)

For the Recruitment and Selection Checklists for both Support and Sport Staff and Teaching and Supply Staff please see Human Resources.

### **APPENDIX VI – RELATED DOCUMENTS**

- Keeping Children Safe in Education 2024
- *Keeping children safe in out of school settings (2022)*
- After school clubs, community activities, and tuition (safeguarding guidance for providers) (September 2023)
- *Behaviour in Schools (2022)*
- Children’s Social Care National Framework (December 2023)
- *Digital and technology standards in schools and colleges (March 2023)*
- Working Together to Improve School Attendance 2024
- [Teaching Online Safety in School - June 2019](#)
- [Working Together to Safeguard Children](#)
- [Disqualification Under the Childcare Act 2006 - August 2018](#)
- [Information Sharing Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents And Carers - July 2018](#)
- [Promoting the Education of Looked After Children And Previously Looked After Children](#)
- [Statutory Guidance for Local Authorities - February 2018](#)
- [Prevent and Tackling Bullying – July 2017](#)
- [Children Missing Education – September 2016](#)
- [The Use of Social Media for Online Radicalisation -July 2015](#)
- [Mental Health and Behaviour in Schools – November 2018](#)
- [Counselling in Schools: A Blueprint for the Future – February 2016](#)
- [Teacher Misconduct: The Prohibition of Teachers - 2022](#)
- [Mandatory Reporting of Female Genital Mutilation- Procedural Information - January 2020](#)
- [Teacher Misconduct: Information For Teachers – 2022](#)
- [Revised Prevent Duty Guidance for England And Wales – 2023](#)
- [Children Missing Education: Statutory Guidance for Local Authorities – September 2016](#)[Regulated Activity in Relation to Children: Scope](#)
- [UK Safer Internet Centre: Appropriate Filtering and Monitoring](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#)
- [When to Call the Police \(NPCC\)](#)
- [Child Sexual Exploitation: Definition and Guide for Practitioners](#)
- [Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People – 2024](#)
- [Safeguarding and protecting people for charities and trustees](#)

#### **Related College Documentation**

For the policies, please see here:

- Anti-bullying policy
- Behaviour Policies
- Equal Opportunities Policy
- EYFS documentation
- Health & Safety Handbook
- ICT & E-Safety Policy
- Missing Pupil Policy
- Recruitment, Selection and Disclosures Policy & Procedure
- Risk Assessments including off site activities
- SEND and SEND (EYFS) Policies
- Spiritual, Moral, Social & Cultural Education Policy
- Staff Code of Safe Practice

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Further local safeguarding partner arrangements documents can be found on  
<https://www.gloucestershire.gov.uk/gscp/>

**The Safeguarding Policy and Child Protection Procedures will be reviewed at least annually and in the light of statutory changes and after any child protection concern.**

**APPENDIX VII - USEFUL CONTACTS**

<b>Internal Contacts:</b>	
<b>Head</b>	<p><b>Wycliffe College</b>                      Mr Christian San José  <a href="mailto:head@wycliffe.co.uk">head@wycliffe.co.uk</a>                      01453 820432</p> <p><b>Wycliffe Prep School</b>                      Mrs Helena Grant  <a href="mailto:prephead@wycliffe.co.uk">prephead@wycliffe.co.uk</a>                      01453 820499</p>
<b>Clerk to Trustees</b>	<p>Mr Luke Godley  <a href="mailto:luke.godley@wycliffe.co.uk">luke.godley@wycliffe.co.uk</a>                      01453 820403</p>
<b>Nominated Safeguarding Trustee</b>	<p>Mrs Elizabeth Buckley                      c/o Luke Godley (Clerk to the Trustees)</p>
<b>Designated Safeguarding Lead</b>	<p><b>College DSL</b>                      Mrs Caoimhe Pettingell  <a href="mailto:caoimhe.pettingell@wycliffe.co.uk">caoimhe.pettingell@wycliffe.co.uk</a>                      01453 820415 or 07591 952289</p> <p><b>Senior School DSL</b>                      Ms Sian Evans  <a href="mailto:sian.evans@wycliffe.co.uk">sian.evans@wycliffe.co.uk</a>                      07857 614295</p> <p><b>Senior School DSL (maternity cover)</b>                      Miss Jennifer Price  <a href="mailto:jennifer.price@wycliffe.co.uk">jennifer.price@wycliffe.co.uk</a>                      07968 423624</p> <p><b>Senior School DDSL</b>                      Mr Scott Costello  <a href="mailto:scott.costello@wycliffe.co.uk">scott.costello@wycliffe.co.uk</a>                      07763 556670</p> <p><b>Prep School DSL</b>                      Mr Richard Lee  <a href="mailto:richard.lee@wycliffe.co.uk">richard.lee@wycliffe.co.uk</a>                      07968 423632</p> <p><b>Prep School DDSL</b>                      Miss Lauren Oliver  <a href="mailto:lauren.oliver@wycliffe.co.uk">lauren.oliver@wycliffe.co.uk</a>                      07512 721593</p> <p><b>Early Years DSL</b>                      Mr David Aherne  <a href="mailto:david.aherne@wycliffe.co.uk">david.aherne@wycliffe.co.uk</a>                      01453 820475</p>

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<b>External Contacts:</b>	
Gloucestershire Multi-Agency Safeguarding Hub (MASH) (office hours)	01452 426565
Emergency Duty Team (out of hours)	01452 614758
Gloucestershire Community Social Work Team	01452 426263
Gloucestershire's Local Authority Designated Officer (LADO)	01452 426994
Allegations Management Coordinator	<b>01452 426320</b> <b>Admin@gloucestershire.gov.uk</b>
Police	Non-emergency: 101 Emergency: 999
Ofsted Safeguarding Children	0300 123 4666 (Monday to Friday 8am-5pm) <a href="mailto:CIE@ofsted.gov.uk">CIE@ofsted.gov.uk</a>
Independent Schools Inspectorate	0207 6000 100 <a href="mailto:concerns@isi.net">concerns@isi.net</a>
NSPCC Whistleblowing Helpline	0808 028 0285
Support and Advice about Extremism	<b>Gloucestershire Police Prevent Team</b> <a href="#">Counter Terrorism Policing - Act Early</a> 0800 789 321  <b>Regional Channel Coordinator</b> 0117 9455539 <a href="mailto:channelsw@avonandsomerset.pnn.Police.uk">channelsw@avonandsomerset.pnn.Police.uk</a>  <b>Prevent referral advice</b> <a href="#">Gloucestershire Safeguarding Children Partnership's guidance to the Prevent Referral Pathway</a>  <b>DfE dedicated helpline and mailbox for non-emergency advice for Trustees and staff</b> 020 7340 7264 <a href="mailto:Counterextremism@education.gov.uk">Counterextremism@education.gov.uk</a>
<b>NSPCC Whistleblowing Advice Line</b>	Address: Weston House 42 Curtain Road London EC2A 3NH Tel: 0800 028 0285 Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>NSPCC Report Abuse in Education Advice Line</b>	Tel: 0800 136 663 Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
Disclosure and Barring Service	Address: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF Tel: 03000 200 190 Email: <a href="mailto:customerservices@db.s.gov.uk">customerservices@db.s.gov.uk</a>



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Teaching Regulation Agency	0207 593 5393 <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>
National Education Network (NEN)	<a href="mailto:info@nen.gov.uk">info@nen.gov.uk</a>
Support and Advice about Domestic Violence	<p><b>Operation Encompass</b> For FREE advice from an Educational Psychologist about how best to support individuals, call the OE Teachers' National Helpline on 0204 513 9990</p> <p><b>National Domestic Abuse Helpline</b> 24 hours a day on 0808 2000 247</p>