

Child Protection and Safeguarding Policy and Procedures

Brooke House College

2020/21 Version

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College Contacts

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Deputy Designated Safeguarding Leads	Name: Jessica Barrs Email: j.barrs@brookehouse.com Tel: 01858 434245 Mobile: 07702515445 Name: Wylie Wright Email: w.wright@brookehouse.com Tel: 01858 462452 ext 246 Mobile: 07710 509515 Name: Constantin Leonte Email; l.constantin@brookehouse.com Mobile: 07702515441 Name: George Foster (FA) Email: g.foster@brookehouse.com Mobile: 07702515434
Principal	Name: Mike Oliver Email: principal@brookehouse.com Tel: 01858 462452 (Ext: 211) Mobile: 07760 203207
Nominated Safeguarding Director	Name: Joan Williams Email: j.williams@brookehouse.com

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Contacts

Head of Service - Safeguarding and Performance Service

Kelda Claire Tel: 0116 3059084 / 07507686100

LADO / Allegations:

Kim Taylor / Lovona Brown Tel: 0116 305 7597

Designated Officer(s) of the Local Authority:

Names:	Mark Goddard and Karen Browne
Address:	Safeguarding and Improvement Unit Room 500 County Hall Glenfield LE3 8RA

Email and tel:	mark.goddard@leics.gov.uk - 0116 3057 597
Email and tel:	karen.browne@leics.gov.uk - 0116 3054 532

First Response Team and out of hours:

Referral Desk	Tel: 0116 305 0005
Advice phone number for professionals	Tel: 0116 305 5500

Early Help queries and Consultation Line Tel: 0116 3058727

Leicestershire and Rutland Children's Social Care department:

Leicestershire Tel: 0116 3050 005

Email: childrensduty@leics.gov.uk

www: www.lrsb.org.uk

Rutland Tel: 01572 758 407

Email: childrensduty@rutland.gcsx.gov.uk

The local police non-emergency contact number for FGM reporting is 101.

The Local Authority Prevent Partner / Lead is:

Will Baldet
St Philip's Centre Limited
2A Stoughton Drive North
Leicester
LE5 5UB

Tel: 0116 273 3459
Mobile: 07403 727727
Email: prevent@stphilipscentre.co.uk

Channel Referral Prevent Engagement Team] 0116 248 6726
Non-emergency DfE advice 020 7340 7264
counter-extremism@education.gsi.gov.uk

The NSPCC whistleblowing helpline can be contacted on:

National Society for the Prevention of Cruelty to Children (NSPCC)
Weston House
42 Curtain Road
London
EC2A 3NH
Tel: 0808 800 5000
Email: help@nspcc.org.uk

Safeguarding Development Officers, Children and Family Services:

Simon Genders; email: simon.genders@leics.gov.uk;
tel: 0116 3057750

Ann Prideaux; email: ann.prideaux@leics.gov.uk;
tel: 0116 3057317

1 Policy statement

- 1.1 Every pupil should feel safe and protected from any form of abuse and neglect. Pupils will learn how to keep themselves safe and how to recognise when they are risk and how to get help when they need it. The College is committed to safeguarding, creating a culture of vigilance, and promoting the welfare of children and young people and requires everyone who comes into contact with children and their families to share this commitment.
- 1.2 KCSIE defines safeguarding and promoting the welfare of children as protecting children from maltreatment; preventing impairment of children’s mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.
- 1.3 The College's Child Protection and Safeguarding Policy and Procedures (**Policy**) has regard to the following guidance and advice:
 - 1.3.1 Keeping children safe in education (2020) (**KCSIE**);
 - 1.3.2 Working Together to Safeguard Children (2019 February amendment included);
 - 1.3.3 Prevent Duty Guidance for England and Wales (2015);
 - 1.3.4 Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015);
 - 1.3.5 Multi-agency statutory guidance on FGM (2016) Updated Oct 2018, Forced Marriage Updated May 2019, and Breast Ironing non-statutory guidance;
 - 1.3.6 What to do if you're worried a child is being abused: advice for practitioners (2015);
 - 1.3.7 Information sharing: advice for practitioners providing safeguarding services (2018).
 - 1.3.8 Data Protection: Toolkit for schools (DFE, 2018)
 - 1.3.9 Sexual violence and sexual harassment between children (May 2018)
 - 1.3.10 Criminal exploitation of children and vulnerable adults: County lines
 - 1.3.11 UKCCIS: Sexting in schools and colleges (2017)
 - 1.3.12 ‘Upskirting’ Voyeurism Offences Act 2019
 - 1.3.13 Teaching online safety in school guidance DfE June 2019
 - 1.3.14 CPS guidance on Prejudice Bullying of LGBT+ pupils and Hate Crimes for teachers of key stages 3 & 4 Jan 2020
 - 1.3.15 When to call the police: NPCC (National Police Chiefs Council)
- 1.4 The College will:

- 1.4.1 follow the local inter-agency procedures of the [LRSCP] Leicestershire and Rutland safeguarding Children partners (Sept 2019) once the Safeguarding Children Board is disbanded.
 - 1.4.2 ensure the practice of safer recruitment in checking the suitability of staff, directors and volunteers (including staff employed by another organisation) to work with children and young people, and ongoing suitability of staff, directors and volunteers. See the College's separate Safer Recruitment Policy;
 - 1.4.3 be alert to signs of abuse both in the College and from outside (taking into account wider environmental factors in a pupil's life that may be a threat to their safety and/or welfare. Eg contextual safeguarding), and to protect each pupil from any form of abuse, whether from an adult or another pupil;
 - 1.4.4 deal appropriately with every suspicion or complaint of abuse and to support children who have been abused in accordance with his / her agreed child protection plan;
 - 1.4.5 design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;
 - 1.4.6 be alert to the needs of children with physical and mental health conditions;
 - 1.4.7 operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;
 - 1.4.8 assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
 - 1.4.9 identify children who may be vulnerable to radicalisation, and know what to do when they are identified; and
 - 1.4.10 consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in the College or in the local area.
- 1.5 **Application and accessibility**
- 1.5.1 This Policy is a whole-college policy, and applies wherever staff, Directors and volunteers are working with pupils even where this is away from the College, for example an educational visit.
 - 1.5.2 This Policy is published on the College website and is available in hard copy on request. It can be made available in large print or other accessible format if required. Related policies and the Staff Code of Conduct are available on the College website or available on request to the College.
- 1.6 **Related policies**
- 1.6.1 The following policies, procedures and resource materials are also relevant to the College's safeguarding practices:
 - (a) Staff Code of Conduct

- (b) Staff Acceptable Use and Social Media Policy (contained in the Staff Handbook)
- (c) Whistleblowing Policy
- (d) Safer Recruitment Policy
- (e) Anti-bullying Policy and behaviour & discipline policy
- (f) Data protection policy and the related Policy on the Safe and Acceptable Use of ICT.
- (g) Visitor and Access to Grounds Policy
- (h) Risk Assessment Policy for Pupil Welfare
- (i) Missing Pupil Policy
- (j) Policy on Special Educational Needs and Learning Difficulties
- (k) Disability Policy
- (l) Policy on the administration of medicines and supporting pupils with medical conditions
- (m) resource materials for the governance of school safeguarding
- (n) Equal Opportunities Policy including Transgender Policy
- (o) Relationships Education, RSE & Health Education Policy

1.6.2 These policies procedures and resource materials are available to staff on the College's intranet and hard copies are available on request.

2 The Designated Safeguarding Lead

2.1 The College's Board of Directors has appointed a Designated Safeguarding Lead (**DSL**). The DSL is a senior member of staff of the College's leadership team with the necessary status and authority to take lead responsibility for safeguarding and child protection (Including online safety).

2.1.1 The role of the DSL will be to:

2.1.2 ensure the college's child protection policies are known, understood and used appropriately;

2.1.3 ensure the college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;

2.1.4 ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the college in this;

- 2.1.5 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
 - 2.1.6 help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and the college leadership team. The role includes ensuring that the college, and the staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- 2.2 The DSL shall be given the time, funding, training, resources and support to enable him/her to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings - and/or to support other staff to do so - and to contribute to the assessment of children.
- 2.3 The name and contact details of the DSL are set out in the College Contacts list at the front of this Policy. The main responsibilities of the DSL are set out in Appendix 1.
- 2.4 If the DSL is unavailable the activities of the DSL will be carried out by one of the Deputy DSLs. The Deputy DSLs details are also set out in the College Contacts list at the front of this Policy. In this Policy, reference to the DSL includes the Deputy DSL where the DSL is unavailable.
- 2.5 The DSL and Deputy DSL may be contacted on their mobile telephones in relation to any safeguarding concerns out of College hours.

3 Duty of staff, Directors and volunteers

- 3.1 All staff, Directors and volunteers of the College are under a general legal duty:
- 3.1.1 to protect children from abuse;
 - 3.1.2 to be aware of the terms and procedures in this Policy and to follow them;
 - 3.1.3 to know how to access and implement the procedures in this Policy, independently if necessary;
 - 3.1.4 to keep a sufficient record of any concerns, discussions and decisions in accordance with this Policy; and
 - 3.1.5 to report any matters of concern in accordance with this Policy.
- 3.2 The Board of Directors ensures that:
- 3.2.1 there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare;

- 3.2.2 the College's safeguarding arrangements take into account the procedures and practice of the LRSCP, including understanding and reflecting local protocols for assessment and the referral threshold document; and
- 3.2.3 the College contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of children are identified and support to children subject to child protection plans.
- 3.3 The Principal will ensure that the policies and procedures adopted by the Board of Directors, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff, and will evidence this with a staff questionnaire and declaration form. (See 4.3.6 below)
- 3.4 The Board of Directors, as the proprietorial body, has nominated one of its members to take leadership responsibility for the College's safeguarding arrangements. The Nominated Safeguarding Director is Mrs Joan Williams whose contact details are set out in the College Contacts list at the front of this Policy.

4 Training

- 4.1 All training will be carried out in accordance with Leicestershire and Rutland safeguarding partnerships procedures.

4.2 Induction

- 4.2.1 All staff, including temporary staff and volunteers, will be provided with induction training that includes:
 - (a) this Policy;
 - (b) the staff Code of Conduct and Staff Handbook, including the whistleblowing policy, staff Social Media Policy and Acceptable Use of IT Policy;
 - (c) the role of the Designated Safeguarding Lead, his / her identity and contact details together with that of and his / her Deputy;
 - (d) child protection training in accordance with LRSCP procedures;
 - (e) a copy of Part 1 and, where appropriate, Annex A of KCSIE; and
 - (f) appropriate Prevent training.
 - (g) All pupil behaviour policies
 - (h) The safeguarding response to Children Missing Education (CME) in accordance with the College's Missing Pupils Policy & Attendance Policy

4.3 Child protection training

- 4.3.1 All staff including the Principal will receive a copy of this Policy and Part 1 and, where appropriate, Annex A of KCSIE, and will be required to confirm that they have read and understand these. See 3.3 above

- 4.3.2 The Principal and all staff members will undertake appropriate child protection training which will be updated annually and following consultation with the LRSCP. In addition, all staff members will receive safeguarding and child protection updates via e-mail, e-bulletins and staff meetings on a regular basis and at least annually.
- 4.3.3 Staff development training will also include training on how to manage a report of a child-on-child sexual violence or harassment act, online safety and Prevent training assessed as appropriate for them by the College.
- 4.3.4 Additionally, the College will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child sexual exploitation, female genital mutilation, cyberbullying and mental health, and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.
- 4.3.5 The Nominated Safeguarding Director and all other Directors will receive appropriate training to enable them to fulfil their safeguarding responsibilities.
- 4.3.6 The College has mechanisms in place to assist staff to understand and discharge their role and responsibilities with particular regard to KCSIE Part 1 and Annex A, and to ensure that they have the relevant skills and knowledge to safeguard children effectively, including questionnaires / test your understanding forms, staff meetings, professional development reviews. See 3.3 above

4.4 **Designated Safeguarding Lead**

- 4.4.1 The DSL and Deputy DSL will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent awareness training and will be updated at least every two years. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL, see Appendix 1.
- 4.4.2 Prevent duty training will be consistent with Home Office WRAP (Workshop to Raise Awareness of Prevent) training if available.

4.5 **Teaching pupils about safeguarding**

- 4.5.1 The College teaches pupils about safeguarding through the curriculum and PSHE, including guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, and providing information about who they should turn to for help.

The use of social media for online radicalisation

The UK Safer Internet Centre <http://www.saferinternet.org.uk>

CEOP's Thinkuknow website <http://www.thinkuknow.co.uk>

- 4.5.2 The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities. The College has appropriate filters and monitoring systems in place (see the College's

Policy on the Safe and Acceptable Use of ICT) and is mindful that this should not lead to unnecessary restrictions on learning. The aims of our online provision will be such that the College will evaluate what pupils see online and will teach the pupils to recognise techniques for persuasion, types of online behaviour, the ability to recognise online risks and inform the pupils how and when to seek support.

- 4.5.3 The College also sends a very clear message within its educational programme regarding 'sexting' and 'upskirting'. This topic is dealt with in assemblies, the PSHE curriculum and with outside agency presentations.
- (a) "upskirting" became a specific criminal offence under the Voyeurism (Offences) Act 2019 [April 2019]. It typically involves taking a photograph under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification or causing humiliation, distress or alarm.
- (b) "Sexting" [Youth produced sexual imagery]. The College will always respond if informed that pupils have been involved in 'Sexting'. The College will use the UK Council for Child Internet Safety (UKCCIS) guidance, "Sexting in schools and colleges: responding to incidents & safeguarding young people" as its guide. The key points being:-
- Inform the Principal/DSL as soon as possible
 - Support the victim as appropriate and in accordance with their best interests
 - Inform all parents of involved children unless by doing so you put a child at risk
 - Images will not be viewed by school staff
 - If school is to deal with the matter, involve parents in ensuring the images are deleted
 - If there is evidence of exploitation or the targeting of a vulnerable student, inform the police
- 4.5.4 Peer-on-peer abuse is also tackled within the PSHE curriculum and by other means. Within this structure, the College explains how:
- i) Peer-on-peer abuse will be dealt with
- ii) How the risk of peer-on-peer abuse will be minimised by:
- Provide appropriate and regularly updated staff training.
 - Challenge inappropriate behaviours.
 - Provide a preventative curriculum programme.
 - Resources.
- iii) How peer-on-peer abuse will be recorded, investigated, and if necessary, reported
- iv) How the victims, and perpetrators, will be supported

v) Recognises the gendered nature of peer-on-peer abuse; specifically the dominance of male-on-female abuse, and to put in place, through PSHE and other means such as assemblies, measures to educate and mitigate against it.

5 Procedures

- 5.1 The child protection training provided to staff considers the types and signs of abuse and neglect staff must be aware of. The types of abuse and neglect and examples of specific safeguarding issues are set out in Appendix 2.
- 5.2 Staff should refer to the guidance in Appendix 3 in the event of receiving a disclosure from a child and for guidance about recording concerns.
- 5.3 Staff members working with children should maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the **best** interests of the child.
- 5.4 **If staff are ever unsure of what they should do, they must always speak to the DSL.**
- 5.5 **Early help**
- 5.5.1 The College understands that providing early help is more effective in promoting the welfare of children than reacting later. 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.
- 5.5.2 The College's safeguarding training includes guidance about the early help process and prepares all staff to identify children who may benefit from early help. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges.
- 5.5.3 A member of staff or volunteer who considers that a pupil may benefit from early help should in the first instance discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with LRSCP referral threshold document and will support staff in liaising with other agencies and setting up an inter-agency assessment as appropriate.
- 5.5.4 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.
- 5.6 **Concerns about a pupil's welfare**
- 5.6.1 If a member of staff is concerned about a pupil's welfare, the matter should be reported to the DSL as soon as possible. See paragraph 5.10 and Appendix 4 for the procedures for dealing with allegations against staff and volunteers.
- 5.6.2 On being notified of a concern the DSL will consider the appropriate course of action in accordance with the LRSCP referral threshold document. Such action may include early help or a referral to children's social care.

- 5.6.3 If it is decided that a referral is not required, the DSL will keep the matter under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.
- 5.6.4 Staff are reminded that normal referral processes must be used when there are concerns about children who may be at risk of being drawn into terrorism.
- 5.6.5 In accordance with these procedures, if a member of staff has a concern about a child, there should be a conversation with the DSL to agree a course of action where possible. However, any member of staff can make a referral to children's social care. If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

5.7 **If a child is in immediate danger or at risk of harm**

- 5.7.1 If a pupil is in **immediate** danger or is at risk of harm, a referral should be made to children's social care and / or the police immediately.
- 5.7.2 Anybody can make a referral in these circumstances, although normal procedure would be via the DSL. See section 5.9 below for details on making a referral.
- 5.7.3 If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

5.8 **Female genital mutilation and Forced Marriage**

- 5.8.1 Teachers must report to the police known cases of female genital mutilation (FGM) in under 18s & discuss with the DSL unless there is a good reason not to. See Appendix 2 for further information about FGM and this reporting duty.
- 5.8.2 If teachers have suspicions or are concerned that a pupil may be about to be forced into a marriage or may be a victim of forced marriage, their key responsibility is to inform the DSL (the person with designated responsibility for child protection in their school) as soon as possible.

5.9 **Making a referral**

- 5.9.1 The relevant contact information is set out at the front of this Policy. If the referral is made by telephone, this should be followed up in writing. It is considered best practice to record who information is passed on to and for what reason. The College will therefore adopt this procedure.
- 5.9.2 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.
- 5.9.3 If after a referral the pupil's situation does not appear to be improving, the DSL (or the person that made the referral) should press for reconsideration to ensure their concerns are addressed and that the pupil's situation improves.
- 5.9.4 Where relevant, the College will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its

functions to determine whether an individual is vulnerable to being drawn into terrorism. The College will respond to requests for information from the police promptly and in any event within five to ten working days.

5.10 **Dealing with allegations against teachers, including supply teachers, the Principal, Directors, volunteers and other staff**

5.10.1 The College has procedures for dealing with allegations against teachers, including supply teachers, the Principal, Directors, volunteers and other staff who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures are set out in Appendix 4 and follow Part 4 of KCSIE.

5.10.1.1 **Where there is an allegation about a supply teacher:** Whilst The College is not the employer of supply teachers, we will ensure allegations are dealt with properly. In no circumstances will The College decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome.

5.10.2 The local authority has designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children (**Designated Officer(s)**). The Designated Officer(s) will be informed immediately and in any event within one working day of all such allegations that come to the College's attention and appear to meet the criteria set out in paragraph 1 of Appendix 4.

5.10.3 Detailed guidance is given to staff, Directors and volunteers to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in Staff Code of Conduct which is available in Reception, in all staff rooms and on the Engage Staff Portal, and which includes detail of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.

5.10.4 Staff and volunteers should also feel able to follow the College's separate Whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices at the College or potential failures by the College or its staff to properly safeguard the welfare of pupils, and that such concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see the front of this policy for the relevant contact details).

5.11 **Allegations against pupils**

5.11.1 The conduct of pupils towards each other will, in most instances, be covered by the College's behaviour and discipline policies. However, some behaviour by a pupil towards another may be of such a nature that safeguarding concerns are raised. Examples of behaviour by a pupil which may raise safeguarding concerns may include:

- (a) violence, including gender based violence;
- (b) threatening or intimidating behaviour;

- (c) blackmail;
- (d) misconduct of a sexual nature, including indecent exposure or touching or serious sexual assaults;
- (e) sexting and upskirting (see the College's Policy on the Safe and Acceptable Use of ICT for the College's approach to sexting);
- (f) encouraging others to engage in inappropriate sexual behaviour;
- (g) any form of inappropriate behaviour by an older pupil towards a younger or more vulnerable pupil;
- (h) bullying, including cyberbullying.

5.11.2 The College takes steps to minimise the risk of peer on peer abuse, including sexting and upskirting. The College has robust anti-bullying procedures in place (see the College's Anti-bullying Policy) and pupils are taught at all stages of the College about acceptable behaviour and how to keep themselves safe. Risk assessments are carried out and appropriate action taken to protect pupils identified as being at risk including risks arising from behaviour in boarding houses (see the College's Risk Assessment Policy for Pupil Welfare).

5.11.3 Abusive behaviour by pupils must be taken seriously. Behaviour should not be dismissed as being normal between young people, as "banter" or simply "part of growing up". Behaviour such as initiation violence or any form of sexual harassment is not acceptable.

5.11.4 Allegations against pupils should be reported in accordance with the procedures set out in this Policy (see sections 5.5, 5.6 and 5.7).

5.11.5 A pupil against whom an allegation of abuse has been made may be suspended from the College during the investigation and the College's policy on behaviour, discipline and sanctions will apply. The College will take advice from children's social care on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.

5.11.6 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 children's social care, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult.

5.11.7 Where an allegation is made against a pupil, both the victim and the accused will be treated as being at risk and safeguarding procedures in accordance with this Policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services as necessary.

5.12 Informing parents

5.12.1 Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Designated Safeguarding Lead will need to consult the Principal, the Designated

Officer(s), children's social care and / or the police before discussing details with parents. In all cases, the DSL will be guided by LRSCP referral threshold document. For reference, referrals do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents' wishes.

5.12.2 In relation to Channel referrals, the DSL will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

5.12.3 See also section 3 of Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff, volunteer or the Principal of the College.

6 Use of mobile phones and cameras

6.1 The College's policy on the use of mobile phones and cameras in the College, is as follows:

6.1.1 The College's Policy on the Safe and Acceptable Use of ICT sets out the expectations on pupils. This includes expectations with regard to online safety and use of the internet and how the college acts to minimise threats to the safety and/or welfare of pupils

6.1.2 Staff and volunteers should use mobile phones and cameras in accordance with the guidance set out in the staff Code of Conduct.

7 Record keeping, confidentiality and information sharing

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

7.2 Staff must record all concerns about a child on the College's pro forma Recording Form for Safeguarding Concerns which is available at Appendix 5 of this policy and also on the Engage Staff Portal, at Reception, in all staff rooms and from the DSL on request. Guidance on record keeping is set out in Appendix 3.

7.3 The DSL will open a child protection file following a report to him / her of a child protection concern about a pupil. The DSL will record all discussions with both colleagues and external agencies, decisions made and the reasons for them and detail of the action taken.

7.4 The College will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children.

7.5 The College will co-operate with police and children's social care to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989.

7.6 Where allegations have been made against staff, the College will consult with the Designated Officer(s) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

8 Private Fostering

- 8.1 A private fostering arrangement is when a child under 16 (or under 18 if the child has a disability) is being cared and is living with someone else. That person is someone who is not a close relative for example a grandparent, step parent, brother or sister, aunt or uncle. The relative can be half blood, full blood or by marriage. It is an arrangement where care is intended to last more than 28 days. Any private fostering arrangement details must be provided at the point of enrolment and prior to arrival at the College. Brooke House College will make a referral to social care prior to the child's arrival and the LA will a) check that the person who is caring is able to fulfil that role b) check that the accommodation is suitable for the young person. Brooke House will advise the LA of the child's intended date of arrival at the College.

9 Monitoring and review

- 9.1 The Designated Safeguarding Lead will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with the Board of Directors as necessary and seeking contributions from staff. The DSL will update the Senior Management Team regularly on the operation of the College's safeguarding arrangements.
- 9.2 Any child protection incidents at the College will be followed by a review of these procedures by the DSL and a report made to the Board of Directors. Where an incident involves a member of staff, the Designated Officer(s) will be asked to assist in this review to determine whether any improvements can be made to the College's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.
- 9.3 The full Board of Directors will undertake an annual review of this Policy and the College's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. The DSL will work with the Nominated Safeguarding Director, preparing a written report commissioned by the full Board of Directors. The written report should address how the College ensures that this Policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the College and how these have been handled; and the contribution the College is making to multi-agency working in individual cases or local discussions on safeguarding matters.

The full Board of Directors, when undertaking the annual review, policies and safeguarding procedures may also consider independent corroboration, such as inspection of records or feedback from external agencies including the Designated Officer(s). The full Board of Directors will review the report, this Policy and the implementation of its procedures and consider the proposed amendments to the Policy before giving the revised Policy its final approval. Detailed minutes recording the review by the Board of Directors will be made.

Authorised by	resolution of the Board of Directors
Signed	
On behalf of the Board of Directors	
Date	August 2020

Schedule of Updates

Date document updated	Document updated by	Summary update/comments	Location of saved file
October 2016	SD / MCO / RP	Update as part of the Spring/Summer 2016 review of policies and compliance. Updated in line with KCSIE 2016.	Dropbox – SMT – Policies Final
October 2016	RP	Minor amends on VWV advice and in accordance with LG email to RP dated 21 Oct.	Dropbox-SMT-Policies Final
February 2017	MCO	Additions to FGM to take into account tattoos of genitalia etc. and teachers working as volunteers	Dropbox-SMT-Policies Final
February 2017	SD	Update definition of CSE in line with Home Office revision	Dropbox-SMT-Policies Final
May 2017	SD	Additions as recommended further to visit of J.Wood/ ISA Compliance Check	Dropbox-SMT-Policies Final
July 2017	SD	Point 8 Private Fostering added as per Leicestershire County Council Termly Safeguarding Briefing for Schools	Dropbox - SMT Policies Final
September 2018	MCO	Updates in response to changes in KCSIE 2018, Working together to safeguard children 2018, Data Protection Act 2018, and DfE guidance on peer-on-peer sexual abuse and sexual harassment	Dropbox - SMT Policies Final
October 2018	MCO	Updates in response to changes in Multi-Agency Statutory Guidance on FGM	Dropbox - SMT Policies Final

February 2019	MCO	Updates in response to WT amendment Feb 2019	Dropbox - SMT Policies Final
July 2019	MCO	Updates in response to KCSIE 2019 amendments, teaching online safety guidance	Dropbox - SMT Policies Final
September 2019	MCO	Updated in response to further guidance on 'county lines' matters & Final KCSIE version	Dropbox - SMT Policies Final
July 2020	MCO	Updated in response to KCSIE 2020 & ISA compliance check	Dropbox - SMT Policies Final

Schedule of Review

Date of document review	Reviewed by	Scheduled date of next review
July 2017	SD	July 2018
September 2018	MCO/SD	July 2019
July 2019	MCO/SD	July 2020
July 2020	MCO/SD	July 2021

Appendix 1 The Designated Safeguarding Lead

- 1 The DSL for the College site is Sarah Doye, who is the Director of Admissions and Student Services and who may be contacted on 01858 411 695 and 07525 837433.
- 2 The Deputy DSL is Jessica Barrs, who is the College Matron and Constantin Leonte, the Head of Boarding & Pastoral Care who may be contacted on 01858 434245 or 07702 515445 and 07702515441 respectively. Furthermore there is a dedicated DSL for the college's football academy. George Foster, who may be contacted on 07702515434. Please note the Deputy DSL is qualified to the same level as the DSL & holds a Designated Safeguarding Lead training certificate issued by Leicestershire County Council. In the event the DSL or the two deputies are unavailable, referrals should be made to the Principal and then if the Principal is unavailable the designated director for safeguarding.
- 3 In accordance with Annex B of KCSIE, the main responsibilities of the DSL are:

3.1 Managing referrals

- (a) The DSL is expected to:
 - (i) refer cases of suspected abuse to the local authority children's social care as required;
 - (ii) support staff who make referrals to the local authority children's social care;
 - (iii) refer cases to the Channel programme where there is a radicalisation concern as required;
 - (iv) support staff who make referrals to the Channel programme;
 - (v) refer cases where a person is dismissed or has left due to risk / harm to a child to the Disclosure and Barring Service as required;
 - (vi) For referrals to the Teacher Regulation Agency (TRA), these may be made by:
 - A teacher's employer, including an employment or supply agency;
 - members of the public who think that a case of misconduct by a teacher is serious enough to warrant a prohibition order
 - The Police;
 - the Disclosure and Barring Service (DBS) and other regulators who are aware of relevant information
 - (vii) refer cases where a crime may have been committed to the Police as required.

3.2 Work with others

- (a) Liaising with the Principal to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- (b) As required, liaise with the Case Manager (see Appendix 4 of this policy) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member);
- (c) Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

3.3 **Raise awareness**

- (a) The DSL should ensure this Policy is known, understood and used appropriately;
- (b) Ensure this Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Board of Directors regarding this.
- (c) Ensure this Policy is available publicly.
- (d) Ensure that parents are aware that referrals about suspected abuse or neglect may be made to children's social care and the College's role in this.
- (e) Maintain links with the Leicestershire and Rutland safeguarding partnerships to ensure staff are aware of training opportunities and the local policies on safeguarding.

3.4 **Child protection file**

- (a) Where children leave the College ensure their child protection file is sent to any new school or college as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt will be obtained. It is no longer a legal requirement for the school to keep a copy of this file other than for reasons of compliance of the Data Protection Act 2018 and the college's data retention policy

3.5 **Prevent**

- (a) In accordance with the Prevent Duty Guidance for England and Wales and Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) the DSL has, in addition, the following responsibilities:
 - (i) Acting as the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty;
 - (ii) Co-ordinating Prevent duty procedures in the College;
 - (iii) Liaising with local Prevent co-ordinators, the police and local authorities and through existing multi-agency forums, including

referrals to the Channel Police Practitioner and/or the police where indicated;

- (iv) Undergoing WRAP or other appropriate training;
- (v) Maintaining ongoing training programme for all school employees including induction training for all new employees and keeping records of staff training; and
- (vi) Monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty.

4 **Availability**

4.1 During term time the designated safeguarding lead (or a deputy) will always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, the College has established the definition that working with the designated safeguarding lead and what “available” means allows in exceptional circumstances availability via phone and/or Skype or other such medium as being acceptable. Adequate cover will always be made available during term time working hours.

5 The DSL and the Deputy DSL have undertaken training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent awareness training and will be updated at least every two years. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- 5.1 understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- 5.2 have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- 5.3 can contribute to inter-agency working in line with *Working Together to Safeguard Children 2019 and* through effective communication and good co-operation with local agencies.
- 5.4 ensure each member of staff has access to and understands the College’s child protection policy and procedures, especially new and part time staff;
- 5.5 are alert to the specific needs of children in need, those with special educational needs and young carers;
- 5.6 are able to keep detailed, accurate, secure written records of concerns and referrals;
- 5.7 understand and support the College with regard to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;

- 5.8 obtain access to resources and attend any relevant or refresher training courses;
- 5.9 encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them.

Appendix 2 Types and signs of abuse and specific safeguarding issues

1 Types of abuse

- 1.1 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.
- 1.2 Part one of KCSIE defines the following types of abuse, however, staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another.
- 1.3 **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- 1.4 **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.
- 1.5 **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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.
- 1.5.1 Where consenting, underage pupils have engaged in a sexual act, and it is clear no laws have been broken, there is no legal obligation to report the underage sex unless exploitation or abuse is suspected. Assessment of such actions of the pupils would be subject to Gillick Competency and Fraser Guidelines. However, a breach of College regulations would have taken place and as such the pupils concerned would be subject to 'school rules'.
- 1.6 **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.

- 1.7 **Domestic Abuse:** Domestic abuse is a vastly under reported crime affecting one in three women and one in six men. Two women are still killed on average every week by their partner or ex-partner. It is rarely a one off event and in most cases the abuse escalates over time. Around three quarters of the children or young people who have had a child protection plan have experienced domestic abuse. Domestic violence is experienced in all communities, in all socio economic groups, by LGBT people as well as in heterosexual relationships and by people of all ages. The definition of emotional harm recognises that children and young people are affected not only by experiencing violence themselves but also by witnessing harm to others. Threatening, controlling, belittling behaviours are domestic abuse as well as physical harm. Children living in households where domestic violence is happening are now identified as "at risk" under the Adoption and Children Act 2002. From 31 January 2005, Section 120 of this act extended the legal definition of harming children to include harm suffered by seeing or hearing ill treatment of others. This would include witnessing domestic abuse. The College aims to provide a safe retreat from problems at home. However, some day pupils may avoid coming to school to stay home to protect their parent or siblings, whilst some boarders may display changes of character knowing what might be going on at home.

Disclosure Where domestic abuse is disclosed, staff must follow Safeguarding Procedures. Namely:

- Don't question or interrogate the young person. This is the role of the police or social services.
- Offer reassurance and explain what will happen next.
- Write down what has been said, what you have seen and what you may already know and share this promptly with your school Designated Safeguarding Lead (DSL). Date and sign all records.
- DSL to consider immediate risk of harm and, as appropriate, contact or refer to First Response/LADO, contact non abusing parent or carer if safe to do so, or police or Domestic Violence contact numbers.

2 **Signs of abuse**

2.1 Possible signs of abuse include, but are not limited to:

- 2.1.1 the pupil says he / she has been abused or asks a question or makes a comment which gives rise to that inference
- 2.1.2 there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries
- 2.1.3 the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour

- 2.1.4 the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
- 2.1.5 the pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing
- 2.1.6 the pupil appears neglected, e.g. dirty, hungry, inadequately clothed
- 2.1.7 the pupil is reluctant to go home, or has been openly rejected by his / her parents or carers and
- 2.1.8 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one to one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.
- 2.1.9 KCSIE 2020 requires all staff to be alert to indicators that may signal that children are at risk from, or involved with, serious violent crime related to 'County Lines' activity. Such indicators 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
 - unexplained gifts or new possessions

"Criminal Exploitation of children and vulnerable adults": County Lines guidance offers further advice.

- 2.2 The Leicestershire and Rutland safeguarding partnerships can provide advice on the signs of abuse and the DfE advice What to do if you're worried a child is being abused (2015) provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice.

3 **Specific safeguarding issues**

- 3.1 KCSIE acknowledges the following as specific safeguarding issues:
 - 3.1.1 bullying including cyberbullying
 - 3.1.2 children missing education (see section 3.2 below)
 - 3.1.3 children missing from home or care
 - 3.1.4 child sexual exploitation (see section 3.3 below)
 - 3.1.5 domestic violence
 - 3.1.6 drugs
 - 3.1.7 fabricated or induced illness

- 3.1.8 faith abuse
- 3.1.9 female genital mutilation (FGM) (see section 3.4.2 below)
- 3.1.10 forced marriage (see section 3.4.3 below)
- 3.1.11 gangs and youth violence including 'Knife Crime'
- 3.1.12 gender-based violence / violence against women and girls (VAWG)
- 3.1.13 hate
- 3.1.14 mental health
- 3.1.15 missing children and adults strategy
- 3.1.16 private fostering
- 3.1.17 preventing radicalisation (see section 3.5 below)
- 3.1.18 relationship abuse
- 3.1.19 sexting
- 3.1.20 trafficking
- 3.1.21 any issues involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons, which relate to abuse across 'county lines'

3.2 **Children missing education**

- 3.2.1 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 2017).
- 3.2.2 This will assist the local authority to:
 - (a) fulfil its duty to identify children of compulsory school age who are missing from education; and
 - (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.
- 3.2.3 The College shall inform the local authority of any pupil who:
 - (a) fails to attend College regularly; or
 - (b) 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 (or in default of such agreement, at intervals determined by the Secretary of State).

- 3.2.4 College attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this Policy if any absence of a pupil from the College gives rise to a concern about his / her welfare. See also Missing pupils policy

3.3 **Child sexual exploitation**

- 3.3.1 Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (Government definition of CSE, Working Together to Safeguard Children March 2015, revised February 2017)

3.4 **Honour- based violence**

- 3.4.1 All forms of so called honour-based violence are abuse (regardless of motivation) and should be handled and escalated as such. Staff should speak to the Designated Safeguarding Lead if they have any doubts.

3.4.2 **Female genital mutilation (FGM)**

- (a) 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.
- (b) There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi-agency statutory guidance on FGM [updated Oct. 2018] (pages 59-61 focus on the role of schools).
- (c) All staff must be aware of the requirement for teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM/genital piercing/genital tattoo/non-medical indicated genital surgery appears to have been carried out on a girl under 18. The report should be made orally by calling 101, the single non-emergency number. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils. 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.
- (d) If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance Mandatory Reporting of Female Genital Mutilation - procedural information for further details about the duty. Note: the mandatory reporting duty does not apply to any voluntary work carried out by teachers and other relevant professionals

- (e) Guidance published by the Department for Health also provides useful information and support for health professionals which will be taken into account by the College's medical staff.

3.4.3 Forced marriage

- (a) Forcing a person into 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.
- (b) Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage.
- (c) Staff should speak to the Designated Safeguarding Lead if they have any concerns. Pages 32-36 of the Multi-agency guidelines: Handling case of forced marriage focus on the role of schools in detecting and reporting forced marriage and the Forced marriage Unit can be contacted on 020 7008 0151 or fmufco.gov.uk for advice and information.

3.5 Radicalisation and the Prevent duty

- 3.5.1 The College has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.
- 3.5.2 The College aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The College is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.
- 3.5.3 The College has adopted the Government's definitions for the purposes of compliance with the Prevent duty:

Extremism: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas"

Radicalisation: "the process by which a person comes to support terrorism and forms of extremism leading to terrorism"

3.5.4 There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing 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. Children at risk of radicalisation may display different signs or seek to hide their views. College staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

3.5.5 Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) notes the following:

There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti social behaviour, family tensions, race/hate crime, lack of self esteem or identity and personal or political grievances.

51. Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists;
- changing their style of dress or personal appearance to accord with the group;
- day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups);
- attempts to recruit others to the group/cause/ideology; or
- communications with others that suggest identification with a group/cause/ideology.

52. Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- using insulting or derogatory names or labels for another group;
- speaking about the imminence of harm from the other group and the importance of action now;

- expressing attitudes that justify offending on behalf of the group, cause or ideology;
- condoning or supporting violence or harm towards others; or
- plotting or conspiring with others."

3.5.6 Protecting children from the risk of radicalisation is part of the College's wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

3.5.7 The DfE's briefing note The use of social media for on-line radicalisation (2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

4 Special educational needs and disabilities

4.1 The College welcomes pupils with special educational needs and disabilities and will do all that is reasonable to ensure that the College's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the College's Policy on Special Educational Needs and Learning Difficulties and Disability Policy.

4.2 Additional barriers can exist when detecting the abuse or neglect of pupils with a special educational need or disability creating additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The College is mindful in particular that:

4.2.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's special educational need or disability without further exploration;

4.2.2 pupils with a special education need or disability can be disproportionately impacted by bullying without outwardly showing any signs; and

4.2.3 there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

Appendix 3 Guidance for staff and volunteers on suspecting or hearing a complaint of abuse or neglect

1 Receiving a disclosure

1.1 A member of staff or volunteer suspecting or hearing a complaint of abuse or neglect:

1.1.1 must listen carefully to the child and keep an open mind. The member of staff should not take a decision as to whether or not the abuse has taken place;

1.1.2 must not ask leading questions, i.e. a question which suggests its own answer;

1.1.3 must reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass on the information in accordance with this Policy so that the correct action can be taken; and

1.1.4 must keep a sufficient written record of the conversation. The record should include:

(a) the date and time;

(b) the place of the conversation; and

(c) the essence of what was said and done by whom and in whose presence;

and must be signed by the person making it, using names and not initials. A record must also be kept of who the written record is distributed to and for what reason.

1.2 All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record (see below) and passed on when reporting the matter in accordance with this Policy.

2 Recording the concern

2.1 Staff must record all concerns about a child in writing.

2.2 Records should be factual and signed and dated, with the name of the signatory clearly printed in writing. Records should include:

2.2.1 the child's details: name, date of birth, address and family details;

2.2.2 date and time of the event / concern;

2.2.3 the action taken and by whom;

2.2.4 the name and position of the person making the record.;

2.2.5 The name and position of the person receiving the record and for what reason.

2.3 The College has a pro forma Recording Form for Safeguarding Concerns which should be completed and passed on when reporting the matter in accordance with this Policy. This pro

forma is available Appendix 5 of this policy. The record can be completed after an initial discussion with the DSL and completed with the DSL where appropriate.

Appendix 4 Dealing with allegations against teachers, the Principal, Directors, volunteers and other staff

1 The College's procedures

- 1.1 The College's procedures for dealing with allegations made against staff will be used where the teacher, the Principal, Director, volunteer or other member of staff has:
- 1.1.1 behaved in a way that has harmed a child, or may have harmed a child;
 - 1.1.2 possibly committed a criminal offence against or related to a child;
 - 1.1.3 behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she work regularly or closely with children; or
 - 1.1.4 Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 1.2 Any allegations not meeting these criteria will be dealt with in accordance with the LRSCP procedures. Advice from the Designated Officer will be sought in borderline cases. Such cases would then be dealt with following the College's internal disciplinary procedures with reference to the Staff Handbook, Staff Contract & Staff Code of Conduct, where appropriate.
- 1.3 All such allegations must be dealt with as a priority without delay. The Designated Officer(s) will be informed immediately and in any event within one working day of all allegations that come to the College's attention and appear to meet the criteria in paragraph 1.1 above.
- 1.4 Allegations against a teacher who is no longer teaching and historical allegations will be referred to the police.

2 Reporting an allegation

- 2.1 The reporting requirements for allegations against a teacher, the Principal, Director, College Advisor, volunteer or other member of staff are set out below. In all cases, the member of staff making the allegation may consider discussing his / her concerns with the DSL and making a referral via him / her. The only circumstances in which this would not be appropriate are if the allegation is against the DSL.
- 2.2 Where an allegation or complaint is made against any member of staff (other than the Principal), the Designated Safeguarding Lead or a volunteer, the matter should be reported immediately to the Principal. The allegation will be discussed immediately with the Designated Officer(s) before further action is taken. The Principal will not undertake any investigation without prior consultation with the Designated Officer. Where appropriate, the Principal will consult with the Designated Safeguarding Lead. Where an allegation or complaint is made against the Principal, the matter should be reported immediately to the Nominated Safeguarding Director, without first notifying the Principal. The allegation will be discussed immediately with the Designated Officer(s) before further action is taken. The Directors of Brooke House College are all members of the Williams family and the Nominated Safeguarding Director is Mrs Joan Williams, a member of that family. The Directors recognise the potential for conflicts of interest to arise where

allegations are made against fellow family members. Therefore, any allegation made against any Director should be reported directly to the local authority Designated Officer(s) [LADO]. In these circumstances, it would normally be appropriate for the reporting member of staff to liaise with the DSL.

- 2.3 The Directors have appointed College Advisors to sit on the Board of Directors in an advisory capacity. Where an allegation is made against a College Advisor, the matter should be reported to the Nominated Safeguarding Director. The allegation will be discussed immediately with the Designated Officer(s) before further action is taken. If it is not possible to report to the Principal or Nominated Safeguarding Director in the circumstances set out above, a report should be made immediately to the Designated Safeguarding Lead. The Designated Safeguarding Lead will take action in accordance with these procedures and will as soon as possible inform the Principal or, where appropriate, the Nominated Safeguarding Director and/or the other Designated Officers.
- 2.4 The person taking action in accordance with the procedures in this Appendix is known as the "Case Manager". The person making the report of the concern or allegation is the "reporting member of staff" or the "reporting party".
- 2.5 It should be noted that the Data Protection Act 2018 and associated regulations falling under the umbrella of 'GDPR' do not prevent or limit the sharing of information for the purposes of keeping children safe. This extends to third party practitioners being allowed to share information without consent.

3 Disclosure of information

- 3.1 The Case Manager will inform the accused person of the allegation as soon as possible after the Designated Officer(s) has been consulted.
- 3.2 The Parents or carers of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. They may also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.
- 3.3 Where the Designated Officer(s) advises that a strategy discussion is needed, or the police or children's social care need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.
- 3.4 The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed. The College will make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the accused person is charged with an offence, or the DfE/ Teaching Regulation Agency [TRA] publish information about an investigation or disciplinary case.

4 Further action to be taken by the College

- 4.1 A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The College will take

action in accordance with Part four of KCSIE and the College's employment procedures. Suspension of a staff member will be carried out in conjunction with the Designated Officer and in accordance with HR regulations.

- 4.2 Where a member of boarding staff is suspended pending an investigation of a child protection nature, arrangements for alternative accommodation away from children will be made for the member of staff.

5 **Ceasing to use staff**

- 5.1 If the College ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement agreement (formerly known as a compromise agreement) will not be used and a referral to the Disclosure and Barring Service will be made promptly if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within the College, with a report being presented to the Board of Directors without delay.
- 5.2 If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the College in accordance with this policy and a referral to the Disclosure and Barring Service will be made promptly if the criteria for referral are met.
- 5.3 Separate consideration will be given as to whether a referral to the TRA be made where a teacher has been dismissed, or would have been dismissed had he / she not resigned, because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence.

6 **Malicious allegations**

- 6.1 Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Principal will consider whether to take disciplinary action in accordance with the College's behaviour and discipline policy.
- 6.2 Where a parent has made a deliberately invented or malicious allegation the Principal will consider whether to require that parent to withdraw their child or children from the College on the basis that they have treated the College or a member of staff unreasonably.
- 6.3 Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the College reserves the right to contact the police to determine whether any action might be appropriate.

7 **Record keeping**

- 7.1 Details of allegations found to be malicious will be removed from personnel records.
- 7.2 For all other allegations, full details will be recorded on the confidential personnel file of the person accused.
- 7.3 An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references. In accordance with KCSIE, a history of repeated concerns or

allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

- 7.4 The College will retain all safeguarding records and relevant personnel records for so long as reasonably required and in accordance with the data retention policy¹

¹ In accordance with the terms of reference of the Goddard Inquiry all Schools are required to retain information which relates to allegations (substantiated or not) of organisations and individuals who may have been involved in, or have knowledge of child sexual abuse or child sexual exploitation; allegations (substantiated or not) of individuals having engaged in sexual activity with, or having a sexual interest in, children; institutional failures to protect children from sexual abuse or other exploitation.

Appendix 5

Recording Form for Safeguarding Concerns

Staff are required to complete this form and pass it to SARAH DOYE (DSL), JESSICA BARRS (DDSL), LEO CONSTANTIN (DDSL) or GEORGE FOSTER (DDSL) if they have a safeguarding concern about a pupil in the college.

Full name of child	Nationality	Date of Birth	Your name and position in school

Nature of concern/disclosure

Details of concern, please describe the issue fully including dates, names, reported allegations, observations of behaviour, injuries etc (please continue on a separate sheet if necessary)

Who are you passing this information to and for what reason?

Name:

Position:

Reason:

Your signature:

Time:

Date:

Action taken by DSL

(Consider the context: past incidents, SEN, significant life changes etc.)

Referred to...?

Attendance

Officer

Police

School Matron

Children's
Services

Parents informed? Yes / No (If No, state reason)

Full name:

DSL Signature:

Date: