

# Newton Abbot College

## Safeguarding and Child Protection Policy and Procedures

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**Reviewed January 2018 Reviewed by: Lesley Ring**

Designated Safeguarding Lead: Lesley Ring Deputy Principal

Deputy Designated Safeguarding Lead: Kate Keys Head of Student Support

Principal: Paul Cornish

Nominated Governor: Deborrah Back

## Safeguarding Policy – Statement and Principles

This, the Safeguarding and Child Protection Policy, is one of a series in the college's integrated Safeguarding portfolio. This includes our policies for Anti-Bullying; Staff Code of Conduct and Disciplinary procedures; Recruitment; Allegations against staff; Complaints Procedure; Student Behaviour and On-line Safety

This policy is available on the college website and is available to staff, volunteers, parents and all visitors to the college.

Our core safeguarding principles are as follows:

- the college's responsibility to safeguard and promote the welfare of children is of paramount importance
- safer children make more successful learners
- representatives of the whole-college community of students, parents, staff and governors will be involved in policy development and review
- policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.

## Child Protection Policy

### Statement

**We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. Child Protection forms part of the College's safeguarding responsibilities.**

### Principles

- The welfare of the child is paramount
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm
- All staff believe that our college should provide caring, positive, safe and stimulating environment that promotes the social, physical and moral development of each individual child
- Students and staff involved in child protection issues will receive appropriate support and supervision

### Aims

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities
- To provide an environment in which children and young people feel safe, secure, valued and respected and feel confident to and know how to approach adults if they are in difficulties believing they will be effectively listened to.
- To ensure consistent good practice
- To demonstrate the college's commitment with regard to child protection to students, parents and other partners

## Terminology

**Safeguarding** and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of 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.

**Child Protection** is part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering or are likely to suffer significant harm.

**Staff** refers to all those working for or on behalf of the college, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

**Child** includes everyone under the age of 18.

**DSL** refers to the designated safeguarding lead at the college

**Parent** refers to birth parents and other adults in a parenting role eg step/foster/adoptive parents/carers.

## Safeguarding Legislation and Guidance

- **Section 175 of the Education Act 2002**
- **Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2003**
- **The Safeguarding Vulnerable Groups Act 2006**
- **The Teacher Standards 2012**
- **What to do if you're worried a child is being abused 2015** - all staff have been sent copies of this and hard copies are available from Student Support.
- **Working Together to Safeguard Children 2016**
- **Keeping Children Safe in Education 2016**
- **HM Government Information Sharing 2015**

**All staff must read Part One of this guidance and sign to confirm they have done this. Staff can find a copy in RM Staff on NAC Moodle and a hard copy is available in every department/office/staffroom in the college as well as in Reception and in the Study Centre.**

In the UK, more than 50,000 children are annually subject to a Child Protection plan. Research suggests that one child a week dies from abuse and one child in six is exposed to violence in the home. The prevalence of neglect continues to be a major concern and online abuse is increasing. The sexual exploitation of children is a growing problem and disabled children are three times more likely to be abused and neglected.

Due to their day-to-day contact with students staff in college are uniquely placed to observe changes in children's behaviour and the outward signs of abuse. Children may also turn to a trusted adult in college when they are in distress or at risk. It is vital that all staff are alert to the signs of abuse and understand the procedures for reporting their concerns. The college will always act on identified concerns.

## Roles and Responsibilities

### Key personnel:

**Designated Safeguarding Lead (DSL) for Child Protection is Lesley Ring Deputy Principal**

**Contact details: Email: [lring@nacollege.devon.sch.uk](mailto:lring@nacollege.devon.sch.uk) Tel: 01626 367335 Ext 174**

**Deputy Safeguarding Lead for Child Protection is Kate Keys Head of Student Support**

**Contact details: Email: [kkeys@nacollege.devon.sch.uk](mailto:kkeys@nacollege.devon.sch.uk) Tel: 01626 367335 Ext 178**

**The nominated Child Protection governor is Deborrah Back**

**Contact via the Clerk to the Governors: [rbellas@nacollege.devon.sch.uk](mailto:rbellas@nacollege.devon.sch.uk)**

**The Principal is Paul Cornish: [pcornish@nacollege.devon.sch.uk](mailto:pcornish@nacollege.devon.sch.uk)**

### The Designated Safeguarding Lead:

- has the status and authority within the college to carry out the duties of the post, including committing resources and supporting and directing other staff
- is appropriately trained, with updates every two years
- acts as a source of support and expertise to the college community
- encourages a culture of listening to children and taking account of their wishes and feelings
- is alert to the specific needs of children in need, those with special educational needs and young carers
- has a working knowledge of DSCB procedures
- makes staff aware of training courses and the latest policies on Safeguarding
- has an understanding of locally agreed processes for providing early help and intervention
- keeps and monitors detailed written records of all concerns, ensuring that such records are stored securely and flagged on, but kept separate from, the student's general file
- refers cases of suspected abuse to MASH (Multi Agency Safeguarding Hub)
- notifies children's social care if a child with a Child Protection plan is absent for more than two days without explanation
- ensures that when a student leaves the college their Child Protection file is passed to the new school (separately from the main file and ensuring secure transit) and confirmation of receipt is obtained. The student's social worker is also informed
- attends and/or contributes to Child Protection conferences
- coordinates the college's contribution to Child Protection plans
- develops effective links with relevant statutory and voluntary agencies including the DSCB
- ensures that all staff sign to indicate that they have read and understood the Child Protection policy
- ensures that the Child Protection policy and procedures are regularly reviewed and updated annually, working with governors and senior staff regarding this
- liaises with the nominated governor and the Principal as appropriate
- keeps a record of staff attendance at Child Protection training

- makes the Child Protection policy available publicly, on the college website or by other means
- ensures parents are aware of the college's role in safeguarding and that referrals about suspected abuse and neglect may be made

## **The Deputy Safeguarding Lead:**

Is trained to the same level as the DSL and, in the absence of the designated person, carries out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the designated person, the deputy will assume all of the functions above. Other appropriately trained staff include the Heads of House and Head of Sixth Form.

## **Good Practice Guidelines and Staff Code of Conduct**

To meet and maintain our responsibilities towards students we have agreed standards of good practice which form a code of conduct for all staff (see Staff Code of Conduct and Disciplinary Procedures).

Good practice includes:

- treating all students with respect
- setting a good example by conducting ourselves appropriately
- involving students in decisions that affect them
- encouraging positive, respectful and safe behaviour among students
- being a good listener
- being alert to changes in students' behaviour and to signs of abuse, neglect and exploitation
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the college's Child Protection policy, staff behaviour policy and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact, sexual exploitation, extremism, online safety and information-sharing
- asking the student's permission before initiating physical contact, such as assisting with dressing, physical support during PE or administering first aid
- maintaining appropriate standards of conversation and interaction with and between students and avoiding the use of sexualised or derogatory language
- being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse
- applying the use of reasonable force only as a last resort and in compliance with college and DSCB procedures
- referring all concerns about a student's safety and welfare to the DSL or another of the fully trained staff or, if necessary, directly to police or MASH
- following the college's rules with regard to relationships with students and communication with students, including on social media
- deputising for Principal in determining whether any visitor should be escorted or supervised while on site

## **Abuse of position of trust**

All college staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the college staff and a student under 18 may be a criminal offence, even if that student is over the age of consent.

The college's staff behaviour documentation sets out our expectations of staff and is signed by all staff members.

## Children who may be particularly vulnerable

Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that all of our students receive equal protection, we will give special consideration to children who are:

- disabled or have special educational needs
- young carers
- affected by parental substance misuse, domestic violence or parental mental-health needs
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- live transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- at risk of sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- at risk of being drawn into extremism
- have mental health issues

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs

## Children Missing Education

Attendance, absence and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. The DSL will monitor unauthorised absence and take appropriate action, particularly where children go missing on repeated occasions and/or are missing for periods during the college day including referrals to and attendance at **The Missing and Child Sexual Exploitation forum (MACSE)** when appropriate. Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

## Helping children to keep themselves safe

Children are taught to understand and manage risk through our personal, social, health and economic (PSHE) education and sex and relationships lessons and through all aspects of college life. Our approach is designed to help children to think about risks they may encounter and with the support of staff work out how those risks might be reduced or managed. Discussions about risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves and how to behave in a responsible manner. Children are also reminded regularly about online safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures. The college continually promotes an ethos of respect for children, and students are encouraged to speak to a member of staff of their choosing about any worries they may have.

## Support for those involved in a child protection issue

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved.

We will support students, their families, and staff by:

- taking all suspicions and disclosures seriously
- nominating a link person who will keep all parties informed and be the central point of contact
- Where a member of staff is the subject of an allegation made by a student, separate link people will be nominated to avoid any conflict of interest
- responding sympathetically to any request from students or staff for time out to deal with distress or anxiety
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- storing records securely
- offering details of helplines, counselling or other avenues of external support
- following the procedures laid down in our child protection, whistleblowing, complaints, and disciplinary procedures
- co-operating fully with relevant statutory agencies.

## **Complaints procedure**

Our complaints procedure will be followed where a student or parent raises a concern about poor practice towards a student that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a student or attempting to humiliate them, bullying or belittling a student or discriminating against them in some way. Complaints are managed by senior staff, the Principal and governors. An explanation of who to contact and how to contact them is given in the Newton Abbot College 'Safeguarding Information' leaflet.

Complaints from staff are dealt with under the college's complaints and disciplinary and grievance procedures.

Complaints which escalate into a child protection concern will automatically be managed under the college's child protection procedures

## **Whistle blowing if you have concerns about a colleague**

Staff who are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The college's Whistleblowing policy is available electronically or from the Personnel office. It enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Principal. Complaints about the Principal should be reported to the Chair of governors.

Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

## **Allegations against staff**

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to students and we must act on every allegation.

The full procedures for dealing with allegations against staff can be found in *Keeping Children Safe in Education (DfE, 2016)* and in the college's Disciplinary Policy and Procedures document.



Allegations concerning staff who no longer work at the college, or historical allegations will be reported to the police.

## **Staff training**

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff and governors will receive a briefing during their induction, which includes the college's safeguarding/child protection policy and staff behaviour policy, reporting and recording arrangements, and details for the DSL and other fully trained staff. All staff, including the Principal and governors will receive training that is regularly updated and the DSL will receive training updated at least every two years, including training in inter-agency procedures. All staff will also receive safeguarding and child protection updates via email, website access and staff briefings throughout the year.

Supply staff and other visiting staff will be given the college's 'Safeguarding Information' leaflet which is available from the Personnel office and from Reception. All staff will be made aware of the increased risk to abuse of certain groups, including disabled and SEN children, looked after children and young carers

## **Safer recruitment**

Our college endeavours to ensure that we do our utmost to employ safe staff by following the guidance in Keeping Children Safe in Education (2016) (available electronically to all staff; hard copies in all main offices around college) together with the DSCB guidance and the college's Staff Recruitment policy and procedures which are available in the Personnel office.

At least one member of each recruitment panel will have attended safer recruitment training.

All new members of staff will undergo an induction that includes familiarisation with the college's child protection policy and staff behaviour policy and identification of their child protection training needs.

All staff sign to confirm they have received a copy of the child protection policy and staff behaviour policy.

The college obtains written confirmation from supply agencies or third party organisations that agency staff or other individuals who may work in the college have been appropriately checked.

Trainee teachers will be checked either by the college or by the training provider, from whom written confirmation will be obtained.

The college maintains a single central record of recruitment checks undertaken.

## **Volunteers**

Volunteers, including governors will undergo checks commensurate with their work in the college and contact with students. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised or be allowed to engage in regulated activity.

## **Supervised volunteers**

Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safe recruitment checks appropriate to their role, in accordance with the college's risk assessment process and statutory guidance.

## **Contractors**

The college checks the identity of all contractors working on site and requests DBS checks and barred list checks where appropriate. Contractors who have not undergone checks will not be allowed to work unsupervised during the college day.

## **Site security**

Visitors to the college, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site along with a Safeguarding leaflet which explains the College Safeguarding procedures. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the college's safeguarding and health and safety regulations to ensure children in college are kept safe. The Principal will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

## **Extended school and off-site arrangements**

All extended and off site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the college, our own child protection policy and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our students attend off-site activities, including day and residential visits and work related activities, we will check that effective child protection arrangements are in place.

## **Photography and images**

The vast majority of people who take or view photographs or videos of children do so for entirely innocent and legitimate reasons. Sadly, some people abuse children through taking or distributing images, so we must ensure that we have some safeguards in place.

To protect students we will:

- seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- seek parental consent
- use only the student's first name with an image
- ensure students are appropriately dressed
- encourage students to tell us if they are worried about any photographs that are taken of them.

## **Online Safety**

Our students increasingly use electronic equipment on a daily basis to access the internet and share content and images via social networking sites such as Facebook, twitter, MSN, Tumblr, snapchat and Instagram.

Unfortunately some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to grooming and enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. Students may also be distressed or harmed by accessing inappropriate websites that promote unhealthy lifestyles, extremist behaviour and criminal activity.

The college's online safety policy explains how we try to keep students safe in college and protect and educate students in the safe use of technology. Cyberbullying and sexting by students will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures. Serious incidents may be managed in line with our sexual exploitation policy or child protection procedures

Many students own or have access to hand held devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.

## **Staff/student relationships**

The college provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with students (see Staff Guidelines for the use of Social Networking Sites). Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

## **Child protection procedures**

### **Recognising abuse**

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

Abuse may be committed by adult men or women and by other children and young people.

Keeping Children Safe in Education (DfE 2016) refers to four categories of abuse and neglect as follows:

### **Four categories of abuse**

#### **Physical abuse**

Physical abuse is 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. (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

#### **Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent 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 cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

#### **Sexual abuse**

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

clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

## **Neglect**

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

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

## **Bullying**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our tackling-bullying procedures. A copy of the Anti-Bullying policy is readily available on the website and the subject of bullying is addressed at regular intervals in assemblies and in 'PSHE' education.

We acknowledge that repeated racist incidents or a single serious racist incident may lead to consideration under child protection procedures. We keep a record of racist incidents and report them to the Local Authority.

## **Indicators of abuse**

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the DSL.

**It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

A child who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits

- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss college, arrive late or leave the college for part of the day
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested/over interested in their college work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new 'friends'

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. Staff are encouraged to use Devon's Threshold Tool.

**It is very important that staff report their concerns – they do not need 'absolute proof' that the child is at risk.**

## **Taking action**

**Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "it could happen here".**

Key points for staff to remember for taking action are:

- in an emergency take the action necessary to help the child, if necessary call 999
- report your concern as soon as possible to the DSL, definitely by the end of the day
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of concern
- seek support for yourself if you are distressed.

## **If you are concerned about a student's welfare**

There will be occasions when staff may suspect that a student may be at risk, but have no 'real' evidence. The student's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the student the opportunity to talk and ask if they are okay or if they can help in any way.

Staff should record these early concerns. If the student does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the student, if the member of staff remains concerned, they should discuss their concerns with the DSL or other fully trained staff.

## **If a student discloses to you**

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a student talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the student know that they must pass the information on** – staff are not allowed to keep secrets. The point at which they tell the student this is a matter for professional judgement.

During their conversations with the student staff will:

- allow them to speak freely
- remain calm and not overreact
- give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’
- not be afraid of silences
- **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what the student’s mother thinks about all this. **Do remember your TED questions: Tell me.... Explain..... Describe.....**
- at an appropriate time tell the student that in order to help them, the member of staff must pass the information on and explain to whom and why
- not automatically offer any physical touch as comfort
- avoid admonishing the child for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ may be interpreted by the child to mean that they have done something wrong
- tell the student what will happen next. The student may agree to go to see the DSL. Otherwise let them know that someone will come to see them before the end of the day.
- report verbally to the DSL even if the child has promised to do it by themselves
- write up their conversation as soon as possible and hand it to the DSL as soon as possible
- seek support if they feel distressed

## Notifying parents

The college will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the student. Therefore, if the College believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from MASH and /or the police before parents are contacted.

## Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the student and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL, Deputy DSL, Heads of House (Level 3 trained), Principal or Chair of Governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a ‘need-to-know’ basis.

However, following a number of cases where senior leaders in schools had failed to act upon concerns raised by staff, *Keeping Children Safe in Education (2016)* emphasises that **any** member of staff can contact children’s social care if they are concerned about a child.

Child protection information will be stored and handled in line with the Data Protection Act 1998. Information sharing is guided by the following principles. The information is:

- necessary and proportionate

- relevant
- adequate
- accurate
- timely
- secure

Information sharing decisions will be recorded, whether or not the decision is taken to share.

All written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Child protection information will be stored separately from the student's college file and the college file will be 'tagged' to indicate that separate information is held.

The DSL will normally obtain consent from the student and/or parents to share sensitive information within the college or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the Principal or DSL.

The Data Protection Act does not prevent college staff from sharing information with relevant agencies, where that information may help to protect a child.

The College Confidentiality and Information-sharing policy is available to parents and students on request.

## Enquiry to MASH

The DSL will make an enquiry to MASH if it is believed that a student is suffering or is at risk of suffering significant harm. The student (subject to their age and understanding) and the parents will be told that an enquiry is being made, unless to do so would increase the risk to the child.

**Any member of staff may make a direct enquiry to children's social care if they genuinely believe independent action is necessary to protect a child.**

## Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency and the DSL, their deputy, other fully trained staff, the Principal and the Chair of Governors are all unavailable
- they are convinced that a direct report is the only way to ensure the student's safety
- for any other reason they make a judgement that direct referral is in the best interests of the child.

## Children who are particularly vulnerable

The College recognises that some children are more vulnerable to abuse and neglect and that additional barriers exist when recognising abuse of some children.

We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.

In some cases possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it.

Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

To ensure that all of our pupils receive equal protection we will give special consideration to children who are;

- Disabled or have special educational needs
- Young carers
- Affected by parental substance misuse, domestic abuse or parental mental health needs
- Asylum seekers
- Living away from home
- Vulnerable to being bullied or engaged in bullying
- Already viewed as a 'problem'
- Living in temporary accommodation
- Living transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality
- At risk of sexual exploitation
- Do not have English as a first language
- At risk of female genital mutilation
- At risk of forced marriage
- At risk of being drawn into extremism.

## **Children with sexually harmful behaviour**

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the college's **anti-bullying procedures** where necessary. However, there will be occasions when a student's behaviour warrants a response under child protection rather than anti-bullying procedures.

Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff who become concerned about a student's sexual behaviour, including any known online sexual behaviour, should speak to the DSL as soon as possible.

## **Sexual exploitation of children**

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

The college includes the risks of sexual exploitation in the PSHE and SRE curriculum. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they



perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSL. The DSL will use the Devon Safeguarding Children's Board CSE Screening Tool and contact the local MACSE.

## **Honour-Based Violence (including Female Genital Mutilation and Forced Marriage)**

'Honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so college staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female students about going on a long holiday during the summer vacation period.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

In England and Wales the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age and well below the age of consent in England. College staff receive training and should be particularly alert to suspicions or concerns raised by a student about being taken abroad and not be allowed to return to England.

## **Radicalisation and Extremism**

The government defines extremism as 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.

Some children are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Islamic extremism is the most widely publicised form and schools and colleges should also remain alert to the risk of radicalisation into white supremacy extremism.

College staff receive training to help to identify signs of extremism. Students are given information in assemblies and opportunities are provided in the curriculum to enable students to discuss issues of religion, ethnicity and culture. The college follows the DfE advice Promoting fundamental British Values as part of SMCS (spiritual, moral, social and cultural education) in Schools (2014)

**Further information on Preventing Radicalisation** has been included in *Keeping Children Safe in Education* in line with:

[Prevent Duty Guidance: for England and Wales](#), published in March 2015 as part as the UK's Counter Terrorism strategy. (p.10-15 for schools, registered childcare providers and further education).

[The Prevent Duty, Departmental advice for schools and childcare providers](#), published in June 2015. This non-statutory departmental advice is for governing bodies, Principals, DSLs and school staff. The document clarifies what the *prevent* duty means for schools and what actions are necessary to demonstrate compliance with the duty. It also provides sources of information, advice and support.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/380595/SMSC\\_Guidance\\_Maintained\\_Schools.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf)

## Private fostering arrangements

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

Where a member of staff becomes aware that a student may be in a private fostering arrangement they will raise this with the DSL and the college should notify the local authority of the circumstances.

## Looked after children

The most common reason for children becoming looked after is as a result of abuse or neglect. The college ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The Designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the local authority's Virtual Headteacher for children in care.

## Work Experience

The college has detailed procedures to safeguard students undertaking work experience, including arrangements for checking people who provide placements and supervise students on work experience which are in accordance with the guidance in *Keeping Children Safe in Education (2016)*

## Children staying with host families

The college may make arrangements for students to stay with a host family during a foreign exchange trip or sports tour. Some overseas students may reside with host families during college terms and we will work with the local authority to check that such arrangements are safe and suitable

In such circumstances the College follows the guidance in *Keeping Children Safe in Education (2016)*, Annex C to ensure that hosting arrangements are as safe as possible.

## Children Missing Education

Attendance, absence and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation.

The DSL will monitor unauthorised absences and take appropriate action including notifying the local authority particularly where children go missing on repeat occasions and/or are missing for periods

during the school day in conjunction with 'Children Missing Education: Statutory Guidance for Local Authorities.

## Peer on Peer Abuse

In most instances, the conduct of students towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. Newton Abbot College recognises that children are capable of abusing their peers. It will not be passed off as 'banter' or 'part of growing up'. The forms of peer on peer abuse are outlined below.

- Domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- Child Sexual Exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
- Harmful Sexual Behaviour – Children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others.
- Serious Youth Violence – Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19 i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences.

The term peer-on-peer abuse can refer to all of these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences.

There are also different gender issues that can be prevalent when dealing with peer on peer abuse (i.e. girls being sexually touched/assaulted or boys being subjected to initiation/hazing type violence).

This College aims to reduce the likelihood of peer on peer abuse through;

- the established ethos of respect, friendship, courtesy and kindness;
- high expectations of behaviour;
- clear consequences for unacceptable behaviour;
- providing a developmentally appropriate PSHE curriculum which develops pupils' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe;
- systems for any pupil to raise concerns with staff, knowing that they will be listened to, valued and believed;
- robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils and those identified as being at risk.

Research indicates that young people rarely disclose peer on peer abuse and that if they do, it is likely to be to their friends. Therefore, this College will also educate pupils in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the school and what services they can contact for further advice.

Any concerns, disclosures or allegations of peer on peer abuse in any form should be referred to the DSL using Newton Abbot College's child protection procedures as set out in this policy. Where a concern regarding peer on peer abuse has been disclosed to the DSL(s), advice and guidance will be

sought from MASH and where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted.

Working with external agencies the school will respond to the unacceptable behaviour. If a pupil's behaviour negatively impacts on the safety and welfare of other pupils then safeguards will be put in place to promote the well-being of the pupils affected and the victim and perpetrator will be provided with support.

## **Youth produced sexual imagery (sexting)**

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Youth produced sexual imagery refers to both images and videos where;

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people' .

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.

If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery.

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to MASH or the Police as appropriate.

Immediate referral at the initial review stage should be made to MASH/Police if;

- The incident involves an adult;
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs);
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent;
- The imagery involves sexual acts;
- The imagery involves anyone aged 12 or under;
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide to respond to the incident without escalation to MASH or the police.

In applying judgement the DSL will consider if;

- there is a significant age difference between the sender/receiver;
- there is any coercion or encouragement beyond the sender/receiver;
- the imagery was shared and received with the knowledge of the child in the imagery;
- the child is more vulnerable than usual i.e. at risk;
- there is a significant impact on the children involved;
- the image is of a severe or extreme nature;
- the child involved understands consent;
- the situation is isolated or if the image been more widely distributed;
- there other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances;
- the children have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be escalated according to our child protection procedures, including reporting to the police or MASH. Otherwise, the situation will be managed within the college.

The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures.

## **Domestic Abuse**

We recognise that children can be traumatised by seeing and hearing violence and abuse.

The College is part of the Devon and Cornwall Police authorities Operation Encompass. The college is contacted by the police between 8.00 – 9.00 am on the day following an incident at an address where a child on the College's roll lives. The college is therefore able to provide support for the child. Details are on the College website.

**Policy agreed and adopted by the Governing Body: 30<sup>th</sup> January 2018**



**For Early Help, Consultation and Enquiries please contact:**

Telephone: **0345 155 1071**

E-mail: [mashsecure@devon.gcsx.gov.uk](mailto:mashsecure@devon.gcsx.gov.uk)

Fax: 01392 448951

Enquiry Form available at:

[www.devon.gov.uk/mash-enquiryform.doc](http://www.devon.gov.uk/mash-enquiryform.doc)

Post: **Multi-Agency Safeguarding Hub, P.O. Box 723, Exeter EX1 9QS**

**Emergency Duty Team** – out of hours

**0845 6000 388**

**Police** – non emergency – 101

For all **LADO** enquiries Exeter (01392) 384964

Or

<http://www.devon.gov.uk/lado>

## **Early Help Team -**

Manager Exeter and South: **Vacant**

Manager Mid & East and North: **Stephen Matthewman**

Early Help Advisers:

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Early Help Assistants:

**Rachel Wright, Karol Stannard, Laura Syree**

0345 155 1071, ask for Early Help [earlyhelpsecure@devon.gov.uk](mailto:earlyhelpsecure@devon.gov.uk)