



## **ST MICHAEL'S COLLEGE SAFEGUARDING & CHILD PROTECTION POLICY 2024-2025**

St Michael's College is committed to providing a safe and secure environment for students, staff and visitors and safeguarding students' welfare by protecting them from maltreatment and impairment to their mental and physical health. We aim to promote a culture of openness, trust and transparency where students and staff will feel confident about sharing any concerns that they may have about their own safety or the safety or well-being of others.

The College's Safeguarding Policy draws upon the duties conferred by the Children Acts 1989 and 2004, S175/157 of the 2002 Education Act (as amended), the Education & Inspections Act 2006, the Serious Crimes Act (2015), The Children and Social Work Act 2017, The Education and Training (Welfare of Children ) Act 2021, The Mental Capacity Act 2005, The Care Act 2014, the Apprenticeships, Skills, Children and Learning Act 2009 (as amended) and the guidance contained in 'Working Together to Safeguard Children' (2023), 'Keeping Children Safe in Education' (DfE September 2024), 'What to do if you're worried a child is being abused' (DfE 2015), 'Sexual Violence and Sexual Harassment in Schools & Colleges' (DfE), 'Meeting digital and technology standards in schools and colleges' (DfE 3/23) and the multi-agency procedures produced by the London Safeguarding Children Partnership, as adopted by the Southwark Local Safeguarding Partnership. As a Relevant Agency, the College will adhere to the policies and procedures and Criteria for Action as published by the London Safeguarding Children Partnership. The policy is applicable to all on-site, off-site and online activities undertaken by students whilst they are the responsibility of the College: including students who might be placed in Alternative Provision.

We will ensure that all school staff have read and understood Part One or Annex A of the 2024-25 'Keeping Children Safe in Education' guidance, as appropriate to their role with children and young people. In respect of students aged 18 and over, we will adhere to the principles and procedures detailed in 'Protecting adults at risk: London multi-agency policy and procedures for protecting adults at risk from abuse', as adopted by the Southwark Safeguarding Adults Partnership.

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## **POLICY AIMS**

The purpose of this policy is to:

- Identify the names of responsible persons in the College and explain the purpose of their role;
- Describe what should be done if anyone in the College has a concern about the safety and welfare of a registered student;
- Outline the additional measures that will be taken to safeguard those students deemed vulnerable by virtue of their special educational or additional needs;
- Set out expectations in respect of training;
- Ensure that the College complies with ‘Safer Recruitment’ principles and duties;
- Set out expectations to ensure that our students are also safeguarded in off-site learning situations: work experience or alternative provision, for example;
- Outline how allegations against / concerns raised in relation to staff will be handled;
- Set out expectations regarding record keeping;
- Clarify how students will be kept safe through the everyday life of the College;
- Describe how the SMSC, PSHEC, RSE and other curriculum areas will be used to protect vulnerable students and build all students’ awareness of risk, safe behaviours, crime and consequences: e.g. raising their awareness of criminal offences such as ‘Upskirting’ and
- Outline how the implementation of this policy will be monitored.

This policy is consistent with all other policies adopted by the Governors and should be read in conjunction with the following documents relevant to the safety, welfare and inclusion of young people:

*Online Safety and mobile devices*  
*Anti-Bullying and Cyber-bullying*  
*Staff Code of Conduct*  
*Attendance*  
*SEN and Inclusion*  
*Central Record of Recruitment and Vetting Checks*  
*Health and Safety*  
*Safer Recruitment*  
*Equalities*  
*Educational Visits*  
*Off-site learners*  
*Guidance on remote learning*

## **THE ROLE OF THE GOVERNING BODY**

The Governing Body will ensure that the College complies with its duties under legislation to safeguard all students and promote their welfare and well-being. They will confirm that policies, procedures and training in the College are effective and comply with current legislation, DfE guidance / advice and the London Safeguarding Children Partnership’s (and Southwark LSP) procedures at all times. They will also ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our college are

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effective and support the delivery of a robust whole school approach to safeguarding. Their training will be regularly updated.

Our governors will take all practicable steps to limit student's exposure to the risks from the College's IT system. As part of this process, our governing body will ensure that the College has appropriate filters and monitoring systems in place and regularly review their effectiveness. In accordance with DfE guidance, 'Meeting digital and technology standards in schools and colleges' (29.3.23), the Governing Body has named **Jo Nottage** to ensure that these standards are being met.

The Governing Body are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements. Further information can be found at Human Rights - 'Equality and Human Rights Commission and Equality Act 2010: advice for schools'.

The Governing Body will ensure that the College contributes to inter-agency working and the local Early Help offer in line with statutory guidance, '*Working Together to Safeguard Children*' DfE December 2023 and that the College's safeguarding arrangements take into account the procedures and protocols adopted by the Local Safeguarding Partners.

In formally adopting this policy, the Governing Body will review its contents annually or sooner if any legislative or regulatory changes are notified to it by the LSP, local authority or the Principal. The DSL has a significant level of responsibility and our governing body will always aim to provide them with the additional time, training, resources, and support needed to carry out the role effectively.

The Governing Body has nominated **Marjorie Bannister (Chair)** to liaise with the local authority and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Principal and she (or the Vice-chair) will attend any strategy meetings called in respect of such an allegation.

The Principal will provide termly and annual reports to the Governing Body, outlining details of any safeguarding issues that have arisen during the term/year, the outcome of any cases identified, the numbers and types of referrals made to the investigating agencies and the outcomes of these referrals. These reports will respect all issues of confidentiality and will not therefore identify any person(s) by name. Governors will also note any training undertaken by College staff or Governors and any changes in national or local guidance and priorities. This is in addition to, and does not replace, the responsibility that rests with the Principal to monitor the work and performance of the Designated Safeguarding Lead.

The Governing Body has nominated **Janice Babb** as its champion for safeguarding issues in the College. The champion will regularly scrutinise the Central Register of Checks (Single Central Record) and meet on a termly basis with the Designated Safeguarding Lead to ensure that the College is meeting its duties and extend Governors' understanding of current issues and challenges faced by staff and students. Acknowledging that all Governors play a role in safeguarding, the Health, Safety & Premises Committee will have oversight of the implementation of this policy.

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## **RESPONSIBILITIES AND IMMEDIATE ACTION**

All adults working in this College (including visiting staff, supply staff, volunteers and professional students/trainees on placement) are required to report instances of actual or suspected child abuse, neglect or exploitation to the Safeguarding Officer.

**The Designated Safeguarding Lead is: Jo Nottage**

**The Safeguarding Officer and Deputy Designated Safeguarding Lead is : Debbie Freegard**

**The Safeguarding Officers are: Tania Rughooputh and Allan Daly**

The Safeguarding Officer is the first point of contact for external agencies that are pursuing child protection investigations and co-ordinates the College's representation at child protection conferences and Core Group meetings (including the submission of written reports for conferences). When an individual concern/incident is brought to the notice of the Safeguarding Officer, they will (in consultation with the Designated Safeguarding Lead) decide whether this should be reported as a child protection issue to the Multi Agency Safeguarding Hub (MASH team) for the student's home address. Where there is any doubt as to the seriousness of this concern, or disagreement between the Safeguarding Officer and the member of staff reporting the concern, advice will be sought from the Designated Safeguarding Lead and the LA's Strategic Lead Officer for safeguarding in education services or the Family Early Help Service (EHS) Duty Manager, as necessary.

The Designated Safeguarding Lead (DSL), who is a member of the school's senior leadership team takes lead responsibility for safeguarding and child protection (including online safety) and works with the mental health leads where safeguarding concerns are linked to mental health issues , provides advice and support to other staff on child welfare and child protection matters, takes part in strategy discussions and inter-agency meetings, and/or supports other staff to do so, and contributes to the assessment of children in need, those at risk of significant harm and those who might benefit from 'Early Help' assessments. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the DSL, this lead responsibility should not be delegated. The DSL is also aware of the requirement for children being interviewed on site by the Police to have an Appropriate Adult in attendance, in accordance with the Statutory guidance - *Police and Criminal Evidence Act (PACE) Code C 2019*.

The Designated Safeguarding Lead is responsible for ensuring that filtering and monitoring systems and processes for the College's IT systems are in place and updated in accordance with the latest DfE guidance. During term time the DSL (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns, which may include availability via phone and/or other media in exceptional circumstances. A member of the safeguarding team will be available throughout the College day during the school term and will be contactable during those periods outside of term time when students are engaged in school journeys or other College-led activities.

**The College acknowledges that safeguarding is the responsibility of the whole school community and that individual staff have the right to initiate a child protection referral to the Multi-agency Safeguarding Hub (MASH) where they believe a student to be at**

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**immediate risk of harm. However, it is our expectation that the member of staff concerned will do so only in the case of a genuine emergency and having pursued the escalation procedures contained in this policy as far as possible. Where a member of staff makes an independent referral, they will have the support of the Designated Safeguarding Lead in doing so.**

Parents/carers will ordinarily be consulted before a referral is made to the MASH team. However, if the concern involves alleged or suspected sexual abuse, female genital mutilation/cutting, so called 'honour' based violence, fabricated/induced illness, child-on-child sexual violence or harassment, exploitation (criminal, sexual, radicalisation, financial or modern slavery for example) or the Safeguarding Officer has reason to believe that informing the parent at this stage might compromise the safety of the student or any other individual, nothing will be said ahead of the referral and arrangements for informing the parents / carers will be agreed with the MASH team.

Referrals will be made to the MASH in the student's home local authority and will be confirmed in writing, using the relevant pro forma. This will be copied to Southwark's Schools Safeguarding Coordinator as an additional safeguard for the student and the College.

The DSL and Safeguarding Officer will exercise their duty to challenge the actions or decisions of Children's Social Care or any other partner agency, in accordance with the relevant LSCP's escalation procedures, where it is believed that an individual professional or agency might not be acting in the best interest of the student concerned.

Where concerns arise about the safety, welfare or well-being of a student who is over the age of 18, contact with parents/carers will be considered in accordance with the College's home-school and learner agreements. Where it is thought that an adult learner might be 'at risk' of abuse, neglect, exploitation or self-harm, the Safeguarding Officer will raise an 'alert' with Adult Social Care's, Safeguarding Adults Manager (SAM) to initiate consideration of a mental capacity assessment or other interventions.

All parents applying for places at the College will be informed of our safeguarding responsibilities and the existence of this policy, on induction and through the College's website. Parents and carers are expected to inform the College of any illness, injury, upset or family event that might otherwise cause us to be concerned about the safety, welfare or wellbeing of the student, in situations where students sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of the college, parents/carers will be notified of this as soon as possible.

## **REFERRALS**

Where there is a safeguarding concern, we take into account the student's wishes and feelings when determining what action to take and what services to provide. We have systems in place for students to express their views and give feedback. We acknowledge that children and young people who are affected by abuse or neglect may demonstrate their trauma and distress through their words, actions, behaviour, demeanour, school work or other students. Ultimately, all our systems and processes operate with the best interests of the student at heart.

Referrals to services regarding concerns about a child or family typically fall into three categories:

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- Early Help Services;
- Child in need - Section 17 (Children Act 1989) referrals;
- Child protection - Section 47 (Children Act 1989) referrals.

We note that Southwark's Multi Agency Safeguarding Hub ([MASH](#)) adopted the London Safeguarding Children Partnership (LSCP) [Threshold Document](#), which provides a framework for professionals who are working with children, young people and families and aims to help identify when a child may need additional support to achieve their full potential. It introduces a continuum of help and support, provides information on the levels of need and gives examples of some of the factors that may indicate a child or young person needs additional support. We also note the LSCP's [The Continuum of Need Matrix](#), which is not an exhaustive list but provides examples that can be used as a tool to assist assessment, planning and decision making for professionals working to safeguard and promote the welfare of children. Safeguarding indicators will always be considered alongside a child's other needs. We will refer to LSCP's Threshold Document and Continuum of Need Matrix when assessing the students' needs and making referrals to MASH.

Safeguarding referrals should be made to the relevant Multi Agency Safeguarding Hub ([MASH](#)) via by telephone and confirmed by submitting [the Referral Form](#) and copied to the LA's Schools Safeguarding Coordinator. Prior to any written form being sent as a referral to Social Care, there should be a verbal consultation with the MASH social worker or manager, by calling the duty desk on **020 7525 1921**, to ensure that making a referral is an appropriate action. The parent/carer will normally be contacted to obtain their consent before a referral is made. However, if the concern involves, for example alleged or suspected child sexual abuse, 'honour-based' abuse, female genital mutilation/cutting, fabricated or induced illness or the Designated Safeguarding Lead has reason to believe that informing the parent at this stage might compromise the safety of the student or a staff member, nothing should be said to the parent/carer ahead of the referral, but a rationale for the decision to progress without consent should be provided with the referral.

Within one working day of a referral being received, local authority children's social care should acknowledge receipt to the DSL and a social work qualified practice supervisor or manager should decide next steps and the type of response required. We will follow up if this information is not forthcoming.

If, after a referral, the student's situation does not appear to be improving, we will consider following local escalation procedures to ensure that the concerns have been addressed and, most importantly, that the student's situation improves.

The [Early Help Referral Form](#) will be used to request additional early help for a family when the needs of a child are beyond the level of support that can be provided by universal services. Southwark's [Family Early Help Service](#) Duty number is **020 7525 1922**, which will give four options:

- General enquiries and signposting
- Family Early Help Duty Manager for general advice including consultations around potential and new referrals and current casework
- Education, Inclusion and Attendance support and advice including all enforcement activity
- Parenting support and advice and information on parenting course and group work programmes

'Working Together' 2023, has expanded the list of students who might benefit from Early Help assessments to include:

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- Children who are missing from education (unexplained / persistent absence, home or Care
- Traumatized children
- Students placed in Alternative Provision and those at risk of permanent exclusion
- Children who have a parent/carer who is in custody or involved in criminal offending
- Care leavers
- Privately fostered children
- Children who are misusing drugs or alcohol

In circumstances where a student has an unexplained or suspicious injury that requires urgent medical attention, the Child Protection referral process should not delay the administration of first aid or emergency medical assistance. **If a student is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness or threats to remove the student during the school day, for example, urgent Police intervention will be requested.**

Where a student sustains a physical injury or is distressed as a result of reported or threatened chastisement, or alleges that they have been chastised by the use of an implement or substance, this will immediately be reported for investigation.

All parents applying for places at the College will be informed of our safeguarding responsibilities and the existence of this policy. In situations where students sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of the College, parents will be notified of this as soon as possible.

St Michael's College recognises the need to be alert to the risks posed by strangers or others (including the parents or carers of other students) who may wish to harm students in school or travelling to and from school and will take all reasonable steps to lessen such risks through liaison with relevant community safety partnerships and our allocated 'School Beat' police officer under the Safer Schools Partnership.

## **VULNERABLE STUDENTS**

The College's pastoral support systems reflect the Governing Body's legal obligations and commitment to safeguarding all students. We recognise the value of early help assessments, early intervention and coordinated support, through a 'Team Around the Child / Family' approach, early help assessments and formal plans for children in need and children at risk of significant harm. We also recognise the need to support students who may be susceptible in areas of their real or online lives over which their parents may have little or no direct influence or control, which may result in bullying, child-on-child abuse or grooming for the purposes of sexual or criminal exploitation, serious youth violence, gang activity, 'County Lines' exploitation, modern slavery, radicalisation, relationship abuse, 'honour-based' crime and other extra-familial (contextual) safeguarding risks and will follow relevant Home Office and DfE guidance and advice.

Particular vigilance will be exercised in respect of students who are the subject of Child Protection or Child in Need Plans and any incidents or concerns involving these young people will be reported immediately to the allocated Social Worker (and confirmed in writing; copied to the LA's Schools Safeguarding Coordinator). If the student in question is a Looked-After child, this will also be brought to the notice of the **Designated Teacher with responsibility for**

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**children looked after and formerly looked after in public care: Debbie Freegard.** The attendance of these students is monitored daily and reported to Welfare Check.

Where a student has an allocated social worker, we will liaise with the relevant virtual school head who, in addition to their statutory duties, now has a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker. We also note the DfE's non-statutory guidance on promoting the education of children with a social worker that contains further information on the roles and responsibilities of virtual school heads.

Local authorities should share with the College the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This will be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children. Where children are allocated to a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised / unexplainable absence or missing education, where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

The College retains safeguarding obligations in respect of any student who is educated off-site and we will regularly monitor the attendance, attainment, welfare and well-being of all such students. We will only place students off-site with appropriately registered providers. We will adhere to appropriate DfE guidance in respect of students undertaking work-experience or other work-based learning

If a student discloses that they have witnessed domestic abuse or it is suspected that they may be living in a household which is affected by family violence or coercive acts, this will be referred to the Safeguarding Officer as a safeguarding issue. The College acknowledges the additional need for support and protection of young people who may be more susceptible by virtue of medical needs (physical or mental health), Special Educational Needs, learning or physical disability, risk of offending, homelessness, refugee/asylum seeker status, the effects of substance abuse within the family, those who are young carers, Travellers, mid-year admissions, excluded students or otherwise placed in alternative provision and speakers of English as an additional language. We will also be vigilant to the attendance and individual needs of students who might be at risk of female genital mutilation/cutting (FGM) or forced marriage: both of which are categorised as so-called 'honour'-based (hate) crimes, and bullying linked to race, gender or sexual orientation. Teachers and other staff in regulated professions are reminded of their legal obligation to report the actual or suspected female genital mutilation/cutting of an under-18 as a safeguarding concern and criminal offence urgently. We also acknowledge that it is unlawful for under 18's to marry: formally or through an informal arrangement.

### **Child-on-child abuse**

The College takes a zero-tolerance approach to child-on-child sexual abuse or harassment: including 'sexting' and the sharing of inappropriate images and reports or disclosures of such activities will be pursued through our Child Protection/Safeguarding and Behaviour Policies. We recognise that, even when there are no reports of such behaviour, this does not mean that it



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is not happening within or beyond the College or the student group and we will follow all relevant advice and guidance, for example

[‘Sharing nudes and semi-nudes: how to respond to an incident’](#)

[An overview for all staff working in education settings in England – March 2024 \(UK Council for Internet Safety\)](#)

We use both the formal and informal curriculum to minimise the risk of child-on-child abuse (including the possession or sharing of nude or semi-nude images) and encourage respectful and healthy relationships between students. We encourage Staff and students to challenge and report unacceptable behaviours, ‘banter’ and inappropriate comments. We will have particular regard to the need to support female students who are subject to sexual touching or assaults, as identified by the Ofsted /ISI thematic review of Sexual Violence and Sexual Harassment (June 2021), and also boys who might be subjected to initiation or ‘hazing’ acts of violence. All such incidents will be reported immediately to the Safeguarding Officer and DSL for appropriate action.

We know that young people who are affected by abuse or neglect, may demonstrate their needs and distress through their words, actions, behaviour, demeanour, academic work or other young people. The College has a strong commitment to an anti-bullying policy and will consider all coercive acts and inappropriate child-on-child behaviour and unlawful sexual activity or harassment within a Child Protection context and in accordance with Part 5 of ‘Keeping Children Safe in Education’.

Where it comes to our notice that a child under the age of 13 is, or may be, sexually active: whether they are a student of this College or not, this will result in an immediate referral to the relevant MASH team. In the case of a young person between the ages of 13 and 15, an individual risk assessment will be conducted, in accordance with the London Child Protection Procedures. This will determine how and when information will be shared with parents and the investigating agencies.

The College acknowledges our legal obligation to support students with medical needs and will work with students, parents and the health authorities to implement Health Care Plans that support the attendance, inclusion and attainment of students with acute or chronic physical or mental health conditions.

We will notify Children’s Social Care of any private fostering arrangements that come to our notice. We will also prioritise the safeguarding needs of any student who is reported by their parents/carers as missing from home.

We acknowledge the importance of full and regular school attendance and the vulnerability of absent students who face higher risk of abuse, neglect, exploitation or going missing from school, home or care. Our absence monitoring systems will ensure early follow-up for such students.

## **TRAINING**

All College staff will be issued with the current version of Part 1 from ‘Keeping Children Safe in Education’ (DfE) (with the exception of the premises team who will be issued with Annex A) and regularly updated on safeguarding procedures and issues through induction programmes, staff meetings and briefings, to ensure that they fully understand this policy and their critical role in safeguarding.

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Whole-school in-service training on safeguarding issues will be organised in accordance with the recommendations of the Southwark Local Safeguarding Children Partnership's Education Sub-group, which currently advises that this should be undertaken on a 3-yearly cycle. The next CP INSET session for all staff will take place by **January 2027**. In addition, staff will be regularly briefed on safeguarding issues and developments through staff meetings, updates and bulletins. All newly recruited staff (teaching and non-teaching) and Governors will be appraised of this policy and will be required to attend relevant internal or external induction training. All new and temporary staff will be required to attend an induction session with a member of the safeguarding team on their first day in the college.

The Designated Safeguarding Lead (and their Deputies) will attend a dedicated induction course and undertake recommended refresher training at least every two years. They will be encouraged to attend appropriate LA network meetings and forums and will update themselves on an annual basis; through online learning, attending conferences or participating in the multi-agency training programme and dissemination/network events organised by the Southwark Safeguarding Children Partnership, for example.

Arrangements are in place for all non-classroom-based support staff: including meals, cleaning and other contracted staff to receive relevant induction and ongoing safeguarding training.

All staff have been made aware of the College's duty to prevent students from being drawn into violent extremism, through dedicated 'Prevent' training and their obligation to refer students or families of concern to the Designated Safeguarding Lead as the College's 'Single Point of Contact' for referral to the Prevent, Channel risk assessment/management panel.

At the beginning of the academic year, all staff will take part in Safeguarding training delivered by the DSL & DDSL. They will read Part 1 of KCSIE and complete an online assessment to check understanding. The DSL or DDSL will then follow up where any gaps in knowledge become apparent, please see Appendix 3 for further information. This will result in all staff having a working knowledge of the main types of abuse and specific issues raised in KCSIE, as well as how to recognise signs and consequently how to act upon any suspicions. Issues including but not limited to:

- Types of child abuse and neglect (Abuse, Physical, Emotional, Sexual & Neglect)
- Mental Health and wellbeing
- Child Criminal Exploitation (CCE)
- Child Sexual Exploitation (CSE)
- 'Sexting'
- Serious violence
- Child criminal exploitation: e.g. county lines
- Peer on peer abuse
- Sexual violence and sexual harassment between children
- Domestic abuse
- Violence Against Women and Girls (VAWG)
- So-called 'honour-based' abuse (HBA) (including Female Genital Mutilation/cutting and Forced Marriage)
- Preventing Radicalisation
- Channel / Prevent
- Private Fostering

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**Please see Appendix 1 for further information.**

## **FILTERING & MONITORING**

Government guidance require that the College should:

‘Identify and assign roles and responsibilities to manager filtering and monitoring of College IT systems Review our filtering and monitoring provision at least annually.

Ensure that our system will block harmful and inappropriate content, without unreasonably impacting the curriculum.

Have effective monitoring strategies that will meet the College’s safeguarding needs’

To meet these expectations, we have assigned a senior leader and Governor to ensure that these standards are met:

‘The SLT will: procure and monitor systems which document what is blocked and why + review the effectiveness of the provision + oversee reports + ensure that ALL STAFF understand *their role* and are appropriately trained +follow policy & protocols +Act upon reports and concerns

The Designated Safeguarding Lead will take lead responsibility for safeguarding and child protection (including online safety and understand the filtering and monitoring systems and processes that are in place)

IT staff or third-party provider will: ensure that monitoring systems are working as expected + provide reporting on student device activity + receive safeguarding training (including online safety) + record and report safeguarding concerns to the Designated Safeguarding Lead’

## **RECRUITMENT**

St Michael’s College is committed to the principles of safer recruitment and maintaining recruitment processes that will help to deter, reject or identify unsafe adults who might seek to gain access to our students and their families. All staff recruited to the College will be subject to appropriate vetting, identity, qualification and health checks. In accordance with DfE Guidance and as appropriate, we will undertake online searches as part of our due diligence checks on shortlisted candidates to identify any candidate’s previous unlawful behaviour, their unsuitability to work with children or that they won’t be bringing the College into disrepute. Accordingly, all shortlisted candidates will be notified in advance that online searches may be undertaken by the College. References will be verified and appropriate Disclosure and Barring Service (DBS) and barred/prohibited persons list checks will be undertaken in accordance with Part 3 of ‘Keeping Children Safe in Education’.

The College maintains a Single Central Record of employment and vetting checks which is regularly checked for compliance by the Principal, a member of the governing body and an external consultant.

Relevant members of the leadership team and governors who are involved in recruitment, will undertake online or face-to-face safer recruitment training, which has been accredited by the

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‘Safer Recruitment Consortium’. This training will be updated every 3 years. In accordance with legal requirements, all recruitment panels will have at least one member who has successfully completed this training within the past 3 years.

The College will only use employment agencies which can demonstrate that they positively vet their supply staff and provide photographic ID in advance of placement. Any alleged misconduct of a temporary member of staff will be reported to the employer concerned and to the Local Authority’s Designated Officer (LADO). Staff joining the College on a permanent or temporary basis will be given access to this policy and provided with a summary of key points and contacts. Additionally, the Staff Handbook issued to all staff confirms the College’s safeguarding procedures, the Staff Code of Conduct and the allegations against staff procedures.

Any member of staff who is found to be culpable of gross misconduct relating to the assault, ill-treatment or exploitation of a student will be notified to the Disclosure and Barring Service for consideration of discretionary barring. Any individual who resigns during or ahead of a management investigation or disciplinary action will similarly be notified to the DBS.

## **VOLUNTEERS**

Any individual or organisation engaged by the College to work in a voluntary capacity with students will be subject to all reasonable vetting procedures and Disclosure and Barring Service checks. Where individual risk assessments deem that it is not appropriate to instigate an enhanced DBS check for occasional volunteers, they may be required to provide references and asked to sign a declaration that they have not been convicted of any criminal or disciplinary offence which would preclude their employment as a worker with young people or adults at risk. Volunteers will work under the direct supervision of an established staff member and will be subject to the same code of conduct expectations as paid employees of the College. Volunteers will at no time be given responsibility for the personal care of students. Voluntary and third sector groups that operate within the College, provide off-site services for our students or use College facilities, will be expected to adhere to this policy or operate a policy which is compliant with the procedures adopted by the Southwark Local Safeguarding Children Partnership. Premises lettings and loans are subject to acceptance of this requirement.

If it comes to our attention that an allegation or complaint of mistreatment has been made against an employee or volunteer of such an organisation, this will be reported by the College to the Local Authority’s Designated Officer (LADO).

## **STAFF CODE OF CONDUCT**

We will endeavour to create and embed a culture of openness, trust and transparency in which the College’s values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

All staff, volunteers and visiting professionals are expected to adhere to a code of conduct in respect of their contact with students and their families, on site, off site and online; which reflects the ‘Teachers Standards’ and the ‘Guidance for safer working practice for those working with children and young people in education settings’ (*Safer Recruitment Consortium February 2022*).

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Students will be treated with respect and dignity and no punishment, detention, restraint, sanctions or rewards are allowed outside of those detailed in the College's Behaviour Management Policy. Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and young people, staff are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation. Where incidents occur that might otherwise be misconstrued, or in the exceptional circumstances where it becomes necessary to physically restrain a student for their own protection or others' safety, this will be appropriately recorded and reported to the Principal and parents. Any physical restraint or intervention used will comply with DfE and LA guidance and the College's Behaviour Management Policy.

Staff are expected to present a professional image to students and parents at all times and to dress appropriately for the task at hand. They must be careful not to engage in formal or informal discussions with students or parents that could undermine their professional credibility or the reputation of the College.

Except in cases of emergency, first aid will only be administered by qualified First Aiders. If it is necessary for the student to remove clothing for first aid treatment, there will, wherever possible, be another adult of the same gender present. If a young person needs help with intimate care, another adult should be present or within earshot. All first aid treatment and non-routine or personal care will be recorded and shared with parents/carers at the earliest opportunity.

For their own safety and protection, staff should exercise caution in situations where they are alone with students. Other than in formal teaching situations; musical instrument tuition, for example, the door to the room in which the one-to-one teaching, counselling or meeting is taking place, should be left open. Where this is not practicable because of the need for confidentiality, for instance, another member of staff will be asked to maintain a presence nearby and a record will be kept of the circumstances of the meeting. All rooms that are used for teaching or counselling students will have clear and unobstructed glass panels in the doors or walls.

College staff have been alerted to risks that can arise from social contact with students outside of the college. Home visits to students or individual tuition of students should only take place with the prior knowledge and approval of the Principal. Any unplanned contact of this nature or suspected infatuations or "crushes" will be reported to the Principal. Staff supervising off-site activities or College journeys will be provided with a College mobile telephone as a point of contact for students, parents and carers.

Staff who are also parents of a student at the College are expected to exercise caution where school friends of their own child might be visitors to their home.

Staff will not communicate with students, past students or parents through social networking sites unless these have been established by the College or this has been agreed in advance by the Principal.

Private tuition of College students by staff is not allowed.

Staff will only use the College's digital technology resources and systems for professional purposes or for uses deemed 'reasonable' by the Principal and Governing Body. Staff will only use the approved college email, College Learning Platform or other College-approved communication systems with students or parents/carers, and only communicate with them on

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appropriate College business and will not disclose their personal telephone numbers, email addresses or social networking details to students or parents/carers. Staff will not use personal cameras (digital or otherwise) or other mobile devices for taking and transferring images of students or staff without permission and will not store images at home. Staff should exercise caution in the use of their personal mobile devices in areas of the College where students may be present and should not leave them unattended.

Staff should be aware of the College's whistle-blowing procedures and share immediately with the Principal any disclosure or concern that relates to a member of staff and nothing should be said to the colleague involved. If the concern relates to the Principal, this should be reported to the Chair of Governors or Vice-chair in their absence.

## **CONTRACTORS**

Contractors who are engaged by or on behalf of the College to undertake works or maintenance on site will be made aware of this policy and the reasons for this. Long-term contractors who work regularly in the College during term time will be asked to provide their consent for DBS checks to be undertaken. These checks will be undertaken when individual risk assessments by the Leadership Team deem this to be appropriate. During major works, when large numbers of workers and sub-contractors may be on site during term time, Health and Safety risk assessments will include the potential for contractors or their employees to have direct access to students in non-teaching sessions. All contractors and sub-contractors will be issued with copies of the College's staff code of conduct and be required to present photographic identification upon their first visit to the site.

Individuals and organisations that are contracted by the school to work with or provide services to students will be expected to adhere to this policy and their compliance will be monitored. Any such contractors will be subject to the appropriate level of DBS check, if any such check is required (for example, because the contractor is carrying out teaching or providing some type of care for or supervision of children regularly). Contractors for whom an appropriate DBS check has not been undertaken will be supervised if they will have contact with children. Under no circumstances we will allow a contractor in respect of whom no checks have been obtained to work unsupervised, or engage in regulated activity. We will determine the appropriate level of supervision depending on the circumstances.

We will always check the identity of contractors and their staff on arrival at the College. Individuals and organisations that are contracted by the College to work with, or provide services to, students will be expected to adhere to this policy and their compliance will be monitored.

## **COMPLAINTS / ALLEGATIONS MADE AGAINST STAFF**

St Michael's College takes seriously all complaints made against adults in positions of trust. Procedures are in place for students, parents and staff to share any concern that they may have about the actions of any member of staff or volunteer.

Any concern about the actions or conduct of any member of staff or volunteer should be brought to the attention of the Principal (or the Designated Safeguarding Lead if the Principal is not available) and nothing should be said to the individual involved. In cases where the Principal is the subject of the allegation or concern, this will be reported to the Chair of

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Governors, who will activate the appropriate procedures. We will follow the procedures described in Part 4 of 'Keeping Children Safe in Education' (2024) where it appears, or it is alleged, that the adult concerned has:

- behaved in a way that has harmed a student or might have harmed them;
- possibly committed a criminal offence against or related to a student;
- behaved towards a child or young person in a way that indicates he or she would pose a risk of harm if they continued to work regularly or closely with young people; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The Local Authority's Designated Officer (LADO) will be informed of all allegations that come to the College's attention that appear to meet the above criteria. Contact may also be made with the LA's Schools Safeguarding Coordinator, who will liaise with the LADO. In cases which do not meet the criteria set out above: described in KCSiE 2024 as 'low-level concerns', local arrangements will be followed to investigate and resolve complaints without delay and in accordance with our published Complaints Procedures. Where there is any doubt as to the correct course to follow, the College will consult the LADO.

Some allegations will be so serious that they will require immediate referral to the LADO, who will convene a Strategy Meeting or Discussion in accordance with the DfE guidance and the appropriate Local Safeguarding Children Partnership's (LSP) procedures. This process will agree upon the appropriate course of action, the continued presence on site of the individual concerned, the timescale for investigations and, as appropriate a communications or media strategy. The Principal will attend, or nominate a member of the SLT to attend, any strategy meeting as the 'case manager'.

The College has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left ahead of, or during, a management investigation or disciplinary action. This referral will be instigated by the Designated Safeguarding Lead. Referrals will be made as soon as possible after the resignation or removal of the individual.

Whilst it will be appropriate to accurately record complaints and allegations, students will under no circumstances be asked by the College to sign 'statements' relating to incidents.

Where concerns about the behaviour of a member of staff or volunteer do not meet the criteria described above for referral to the LADO, The Principal will record and monitor 'low-level' concerns, which might include: over-friendly behaviour towards a student/s, favouritism, or patterns of inappropriate language or behaviour. Unless the allegations concern the Principal, in which case, this will be notified to the Chair of Governor's.

**The Chair of Governors is: Marjorie Bannister**

**The LA's DO is: Eva Simcock 020 7525 0689 There is also a duty system and one of the CP Coordinators in Quality Assurance Unit is on duty each day to deal with DO issues when DO is unavailable. Duty telephone number for enquiries/referrals is 020 7525 3297**

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**The LA's Strategic Lead Officer for safeguarding in education services is: The Director of Children's Services Alasdair Smith 020 7525 5000**  
**The LA's Schools Safeguarding Coordinator is: Apo ÇAĞIRICI 020 7525 2715**

## **RECORDS**

Brief and accurate notes will be kept of all incidents or concerns relating to individual students, contacts with parents/carers and external agencies and entered as appropriate in the College's CPOMS database. Parental agreement will ordinarily be sought before making a referral to the MASH team. If consent is withheld, or it is considered that seeking such consent is likely to further endanger the student or an informant, the College will contact the MASH directly in order that an agreement can be reached as to how and when the parent or carer is to be contacted. The College will take into account the views and wishes of the young person who is the subject of the concern, but staff will always be alert to the dangers of colluding with 'secrets'.

Child protection records are not automatically open to students or parents. They are kept securely by the safeguarding team and separately from educational records. They may only be accessed by the Deputy DSL, the DSL and the Principal or any Safeguarding Officer directed by the Principal. Referrals made to Children's Services under the London SCP's / LSP procedures will be confirmed in writing, with copies sent securely to the MASH and the LA's Schools Safeguarding Coordinator.

St Michael's College acknowledges the particular risks faced by students whose irregular or unexplainable absence might indicate that they are at risk of sexual exploitation, criminal exploitation, serious violence, radicalisation, forced marriage or female genital mutilation/cutting. If a student is withdrawn from the College having not reached the normal date of leaving or transferred to another educational provision; due to a family move or any other reason, all reasonable efforts will be made to identify any new address and the school / college to which they are being admitted and to ensure that their educational records are sent without delay to the student's new setting. If the parent/carer fails to provide this information, an urgent referral will be made to the student's home local authority in order that they might make further enquiries. If the College receives educational records concerning a young person who is not registered with us, the records will be returned promptly to the sending school with a note, advising them to refer to their LA's Children's Services Department. **A student's name will only be removed from the College's Admissions Register in accordance with the Student Registration Regulations and with the authorisation of the relevant local authority.** The College will make all reasonable enquiries to confirm transfers before deleting a student's name from the Admissions Register.

All additions to, or deletions from, the school roll will trigger the completion of a Common Transfer File (CTF), which will be downloaded to the appropriate database via the S2S website. Where an onward destination cannot be determined and the student is of compulsory school age, the CTF will be downloaded to the Lost Students' Database.

The content of Child Protection Conference or Review reports prepared by the College will follow the headings recommended by Children's Services and will, wherever possible, be shared with the parents/carer and student in advance of the meeting.

The College will require documentary proof as to the identity of students presented for admission. If there is any doubt as to the identity of a student, advice will be sought from the



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local authority and other statutory agencies, as appropriate. We will maintain accurate records of those with Parental Responsibility and, where possible, require at least 2 emergency contacts to be recorded. Students will only be released to the care of those with Parental Responsibility or a responsible adult acting with prior parental consent in writing.

Child Protection records will be sent to receiving schools or colleges separately and under a confidential cover, addressed to the Designated Safeguarding Lead. An inventory will be kept of the records sent and a receipt will be obtained from the receiving school or college. Where no onward destination is known, the child protection file will be retained by the College in accordance with LSP and DfE advice and until the student's 25<sup>th</sup> birthday as a minimum. Safeguarding records for students above the age of 18 will be similarly archived.

## **SAFETY IN THE COLLEGE**

No internal doors to classrooms will be locked whilst students are present in these areas. Entry to College premises will be controlled by doors that are secured physically or by constant staff supervision or video surveillance. Authorised visitors to the college will be logged into and out of the premises and will be asked to wear their identity badges or be issued with College visitor badges. Unidentified visitors will be challenged by staff or reported to the Principal or College office. Carelessness in closing any controlled entrance doors or gates will be challenged.

The presence of intruders and suspicious strangers seen loitering near the college or approaching students, will be reported to the Police and the LA with a view to alerting other local schools through Southwark's Schools' Safeguarding Coordinator or the Safer Schools Partnership.

Parents, carers or relatives may only take still, video or digital images of students in College or on College-organised activities with the prior consent of the College and then only in designated areas. Images taken must be for private use only. Recording and/or photographing student images would require the consent of the parents whose children may be captured on film or digitally. Without consent, the data protection legislation is likely to have been breached. Similarly, uploading images of students to the world wide web without consent might constitute a criminal offence. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected.

## **CURRICULUM**

St Michael's College acknowledges the key role that the curriculum can play in the prevention of abuse and exploitation and in the preparation of our students for the responsibilities of adult life and citizenship. It is expected that all curriculum co-ordinators will consider the opportunities that exist in their area of responsibility for promoting the welfare and safety of students and to promote fundamental British values. As appropriate, the curriculum will be used to build resilience, help students to keep safe and to know how to ask for help if their safety is threatened. As part of developing a healthy, safer lifestyle, students will be taught, for example:

- to recognise and manage risks in different situations and then decide how to behave responsibly;
- to judge what kinds of physical contact are acceptable and unacceptable;

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- to recognise when pressure from others (including people they know) threatens their personal safety and well-being; including knowing when and where to get help;
- to use assertiveness techniques to resist coercive pressure;
- mindfulness and emotional literacy.

All computer equipment and internet access within the College will be subject to appropriate 'parental controls' and internet safety rules, in line with the Online Safety Policy. This Policy also describes how the College will use the resources and guidance of the 'Child Exploitation and Online Protection Centre' (CEOP) to help students (and parents) to understand the risks associated with online grooming and the inappropriate use of social media for sexting, hazing and other abusive acts.

St Michael's College will work with partners (including the Agencies Supporting Southwark Programme (ASSP) and Safer Schools Partnership) to promote "Healthy School" status through the curriculum with the aim of:

- Developing a college ethos and environment which encourages a healthy lifestyle for students;
- Using the full capacity and flexibility of the curriculum to help students to achieve safe and healthy lifestyles and mental health;
- Ensuring that food and drink available across the College day, reinforce the healthy lifestyle message;
- Providing high quality Physical Education and sport to promote physical and emotional wellbeing;
- Promoting an understanding of the full range of issues and behaviours which impact upon lifelong health and wellbeing;
- Delivering the new mandatory Relationships & Sex Education (RSE) and Health Education (HE) and/or where delivered, through Personal, Social, Health and Economic (PSHE) & Wellbeing Education;
- Promoting an understanding of the full range of issues and behaviours which impact upon lifelong health and wellbeing, including emotional wellbeing and mental health;
- Working in partnerships with parents/carers, local communities, external agencies and volunteers to support health and wellbeing of all students including the most vulnerable and disadvantaged.

We will fulfil our obligations under the 'Counter Terrorism and Security Act' (2015), to prevent students, their families and staff from being radicalised by violent extremists from religious, political, animal rights and other extremist groups through the Spiritual, Moral, Social and Cultural Curriculum (SMSC) by;

- Enabling students to develop their self-knowledge, self-esteem and self-confidence
- Enabling students to distinguish right from wrong and to respect civil and criminal law
- Encouraging students to accept responsibility for their behaviour and make a positive contribution to the lives of others
- Enabling students to acquire a broad general knowledge of and respect for, public institutions and services
- Furthering tolerance and harmony between different cultural traditions and acquire an appreciation of and respect for their own and other cultures
- Encouraging respect for other people

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- Encouraging respect for democracy and support for participation in the democratic processes

### **The Single Point of Contact for Channel ‘Prevent’ referrals is: The DSL**

In addition, we will:

- Establish a register of students deemed to be at risk of being drawn into terrorism or violent extremism
- Develop an action plan to reduce the risk
- Train staff to recognise radicalisation and extremism
- Refer vulnerable people to ‘Channel’ diversionary interventions with their agreement
- Prohibit extremist speakers and events
- Manage access to online extremist material
- Have regard to published DfE advice and work in collaboration with the statutory agencies

### **WORKING IN PARTNERSHIP WITH PARENTS**

It is our policy to work in partnership with parents or carers to secure the best outcomes for our students. We will therefore communicate as clearly as possible about the aims of this policy.

- We will use clear statements about safeguarding in our brochures and correspondence.
- We will involve parents and students in reviews of this policy and the development of Codes of Conduct and Equalities and Behaviour Management policies.
- We will liaise with agencies in the statutory, voluntary and community sectors and locality teams that are active in supporting families through our ‘Early Help’ offer.
- We will be alert to the needs of parents/carers who do not have English as their first language and use translation services as necessary.
- We will distribute the LA’s leaflet/pdf for parents, ‘*Protecting Children in Education Settings*’.
- We will publish this policy on the College’s web site.
- We will keep parents informed of safeguarding issues as and when appropriate.
- We will encourage parents and carers to use the Principal’s regular consultation open meetings to express their views
- Encourage parents to be aware of online safety risks to their children through unsupervised access to the internet, social media and interactive computer gaming.

### **MONITORING AND EVALUATION**

The governing body will monitor the safeguarding arrangements in the College to ensure that these arrangements are having a positive impact on the safety and welfare of children. This will be evaluated on the basis of evidence of:

- the extent to which a positive culture and ethos is created where safeguarding is an important part of everyday life in the school, backed up by training at every level;
- the content, application and effectiveness of safeguarding policies and procedures, and safer recruitment and vetting processes;



not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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:** 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.

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSLs will be considering whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. This is known as, ‘Risk Outside of the Home’, which simply means assessments of children should consider whether wider environmental factors are present in a child’s life that are a threat to their safety and/or welfare.

**In addition to these types of abuse and neglect, members of staff will also be alert to following specific safeguarding issues:**

### **Mental Health**

We are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Our staff however, are well placed to observe students from day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that our staff members are aware of how these children’s experiences can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, this will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. We also note the DfE’s advice and guidance on [Mental Health and Behaviour in Schools](#).

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

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator and/or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears

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consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Some of the indicators of CCE are: children who appear with unexplained gifts or new possessions; children who associate with other young people involved in exploitation; children who suffer from changes in emotional well-being; children who misuse drugs and alcohol; children who go missing for periods of time or regularly come home late; and children who regularly miss school or education or do not take part in education. Any possible CCE case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

### **Child Sexual Exploitation (CSE)**

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some indicators of children being sexually exploited are: going missing for periods of time or regularly coming home late; regularly missing school or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour. A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16 or 17-year-old if that person holds a position of trust or authority in relation to the young person. Non-consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18. Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#).

Where it comes to our notice that a child under the age of 13 is, or may be, sexually active, whether or not they are a student of this school, this will result in an immediate referral to Children's Services. In the case of a young person between the ages of 13 and 15, an individual risk assessment will be conducted in accordance with the [London Child Protection Procedures](#). This will determine how and when information will be shared with parents and the investigating agencies.

### **Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)**

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal. Sharing nudes and semi-nudes covers the incidents where

- a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18
- a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18
- a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18.

When such an incident involving nudes and semi-nudes comes to a member of staff's attention, this will be shared with the designated safeguarding lead with a view to referring to appropriate agencies following the referral procedures. Further information and advice on nudes and semi-nudes is available in the non-statutory guidance produced by the UK Council for Internet Safety (UKCIS) '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)'. We also note the DfE's [Searching Screening and Confiscation Advice](#) for schools.

## **Serious violence**

All staff will be made aware of indicators, which may signal that children are at risk from, or are involved with serious crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. We are aware that there is a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. We are also aware that fear and a need for self-protection is a key motivation for children to carry a weapon – it affords a child a feeling of power. Neighbourhoods with high levels of deprivation and social exclusion generally have the highest rates of gun and knife crime. Children are more likely to carry knives and other weapons than guns. All staff will be aware of the associated risks and will share any concerns about or knowledge of such children immediately with the DSL. Further advice on these is available in the Home Office documents [Advice to schools and colleges on gangs and youth violence](#) and [Criminal exploitation of children and vulnerable adults: county lines](#).

## **County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, student referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. Some specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who: go missing and are subsequently found in areas away from their home; have been the victim or perpetrator of serious violence (e.g. knife crime); are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs; are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection; are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity; owe a ‘debt bond’ to their exploiters; have their bank accounts used to facilitate drug dealing.

## **Child-on-child abuse**

Children are capable of abusing other children. This can happen both inside and outside of school and online and take different forms, such as bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between peers; physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, which may include an online element that facilitates, threatens and/or encourages physical abuse; violence, particularly pre-planned, forcing other children to use drugs or alcohol, initiation/hazing type violence and rituals), emotional abuse (blackmail or extortion, threats and intimidation), sexual violence, such as rape, assault by penetration and sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (also known as sexting or youth produced sexual imagery), sexual abuse (indecent exposure, indecent touching or serious sexual assaults, forcing other children to watch pornography or take part in sexting) and sexual exploitation (causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; having

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an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight, photographing or videoing other children performing indecent acts) and upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. Upskirting is now a criminal offence. Although it is more likely that girls will be victims and boys' perpetrators, all peer on peer abuse is unacceptable and will be taken seriously. We do not tolerate these or pass them off as "banter", "just having a laugh" or "part of growing up".

The College has a strong commitment to an anti-bullying policy and will consider all coercive acts and child-on-child abuse within a Child Protection context. We recognise that the behaviour of some students may sometimes negatively affect the learning and wellbeing of other students and their behaviour will be dealt with under the school's behaviour policy. As a school, we will minimise the risk of allegations against other students by providing a developmentally appropriate CPSHE syllabus which develops students' understanding of acceptable behaviour and keeping themselves safe, having systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued, delivering targeted work on assertiveness and keeping safe to those students identified as being at risk, developing robust risk assessments and providing targeted work for students identified as being a potential risk to other students. It is important that all our staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports. Any possible child-on-child abuse case will be shared with the DSL with a view to referring to appropriate agencies in accordance with the child protection procedures.-We also note the DfE's advice and guidance on [Preventing and Tackling Bullying](#).

### **Sexual harassment, online sexual abuse and sexual violence**

Sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable in our school and we have appropriate sanctions in place. We understand that sexual harassment, online sexual abuse and sexual violence are happening in and around the College even when there are no specific reports. We work actively to prevent sexual harassment, online sexual abuse and sexual violence through a whole-school approach that includes an effective behaviour policy, pastoral support and a carefully planned relationships, sex and health education curriculum, which specifically addresses sexual harassment, online abuse, sexual violence and issues of consent. We will ensure that children are taught about safeguarding risks, including online risks and will support students to understand what constitutes a healthy relationship, both online and offline. Our staff members have been made aware and have appropriate knowledge of 'Part 5: Child on child sexual violence and sexual harassment' of DfE guidance "[Keeping children safe in education](#)". All students are supported to report concerns about harmful sexual behaviour freely. We will take concerns seriously and deal with them swiftly and appropriately and will ensure students are confident that this is case. We will be alert to factors that increase vulnerability or potential vulnerability such as mental ill health, domestic abuse, children with additional needs, and children from groups at greater risk of exploitation and/or of feeling unable to report abuse (for example, girls and LGBT children). We will identify and address any barriers that can prevent a student from making a disclosure, for example communication needs. Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims. Where necessary, we will work with relevant external agencies to address the issue, which may include a referral to MASH and reporting to the Police. We will keep comprehensive records of all allegations.

### **Sexual violence and sexual harassment between children**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur online and offline (both physically and verbally). It is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will affect their educational attainment. We will handle reports of sexual violence and harassment between children, both on and outside school premises, in line with 'Part 5: Child on



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*child sexual violence and sexual harassment*' of DfE guidance "[Keeping children safe in education](#)" and train our staff members accordingly (including teachers delivering relationships, sex and health education). Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims (and alleged perpetrators). We take these incidents seriously and ensure that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. Where necessary, we will work with relevant external agencies to address the issue, which may include a referral to MASH and reporting to the Police.

On one hand, we need to safeguard the victim (and the wider student/student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. We will take advice, as appropriate, from children's social care, specialist sexual violence services and the police. If the alleged perpetrator moves to another educational institution (for any reason), we will make the new educational institution aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead will take responsibility to ensure this happens as well as transferring the child protection file.

### **Harmful sexual behaviour (HSB)**

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. We consider HSB in a child protection context. When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. We aim to have a good understanding of HSB, which will aid in planning preventative education, implementing preventative measures and incorporating the approach to sexual violence and sexual harassment into the whole school approach to safeguarding. HSB can, in some cases, progress on a continuum.

Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. We will work with appropriate agencies to address HSB and to support children displaying HSB.

### **Children who are lesbian, gay, bi, or trans (LGBTQI+)**

We note that a child or a young person may be LGBT, this is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Our staff will endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum. We will work with appropriate agencies to counter homophobic, biphobic and transphobic bullying and abuse and to provide support to LGBT children.

We will have regard to appropriate DfE guidance concerning gender questioning children.

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## **Domestic abuse**

Domestic violence and abuse or any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. If members of staff have a concern about or knowledge of any domestic abuse incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies. Information is available about [\*Domestic abuse and how to get help in Southwark\*](#). Southwark Council's support and service provider Solace (020 7593 1290, [southwark@solacewomensaid.org](mailto:southwark@solacewomensaid.org)) offer free and confidential support for women and men aged 16 or over who are survivors of domestic abuse.

## **Violence Against Women and Girls (VAWG)**

VAWG is defined as any act of gender-based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. VAWG is the umbrella term which brings together multiple forms of serious violence such as crimes committed in the name of “honour”; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation and rape; stalking; harassment; trafficking for sexual exploitation; prostitution. If members of staff have a concern about or knowledge of any VAWG incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies. We also note [\*Southwark's VAWG Strategy\*](#).

## **So-called ‘honour-based’ abuse (HBA) (including Female Genital Mutilation / Cutting and Forced Marriage)**

HBA includes incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse (regardless of the motivation) and will be handled and escalated as such. If members of staff have a concern about or knowledge of a child that might be at risk of HBA or who has suffered from HBA, they will share it immediately with the DSL with a view to referring to appropriate agencies.

## **Female Genital Mutilation / Cutting (FGM/C)**

FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

FGM is a deeply embedded social norm, practised by families for a variety of complex reasons. It is often thought to be essential for a girl to become a proper woman, and to be marriageable. The practice is not required by any religion.

FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of violence against women and girls.

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FGM is prevalent in 30 countries and is a deeply rooted practice, widely carried out mainly among specific ethnic populations in Africa and parts of the Middle East and Asia. While FGM is concentrated in countries around the Atlantic coast to the Horn of Africa, in areas of the Middle East like Iraq and Yemen, it has also been documented in communities in Colombia, Iran, Israel, Oman, The United Arab Emirates, The Occupied Palestinian Territories, India, Indonesia, Malaysia, Pakistan and Saudi Arabia. It has also been identified in parts of Europe, North America and Australia.

FGM is illegal in the UK. It is estimated that approximately 60,000 girls aged 0-14 were born in England and Wales to mothers who had undergone FGM and approximately 103,000 women aged 15-49 and approximately 24,000 women aged 50 and over who have migrated to England and Wales are living with the consequences of FGM. In addition, approximately 10,000 girls aged under 15 who have migrated to England and Wales are likely to have undergone FGM.

We note a new duty that was introduced on 31 October 2015 that requires teachers, which includes qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions to report 'known' cases of FGM in girls aged under 18 to the police. The duty applies to any teacher who is employed or engaged to carry out 'teaching work', whether or not they have qualified teacher status, in maintained schools, academies, free schools, independent schools, non-maintained special schools, sixth form colleges, 16-19 academies, relevant youth accommodation or children's homes in England. The duty does not apply in relation to suspected cases – it is limited to 'known' cases' (i.e. those which are visually identified or disclosed to a professional by the victim). It will be rare for teachers to see visual evidence, and they should not be examining students or students. The duty does not apply in cases where the woman is over 18 at the time of the disclosure/discovery of FGM (even if she was under 18 when the FGM was carried out). Further information on this duty can be found in the document "[Mandatory Reporting of Female Genital Mutilation – procedural information](#)". A useful summary of the FGM mandatory reporting duty is available in [FGM Fact Sheet](#).

Teachers in our school will personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they will still discuss any such case with the designated safeguarding lead (or deputy) with a view to involving children's social care as appropriate.

### **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales and the law forbids formal or informal marriages involving anyone under the age of 18. 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 perpetrators use perceived cultural practices as a way to coerce a person into marriage. statutory guidance statutory guidance The right to choose: government guidance on forced marriage. We note The Forced Marriage Unit's [statutory guidance](#) and especially Chapter 7 on page 32 of the [Multi-agency guidelines](#), which is specifically aimed at teachers, lecturers and other members of staff within schools, colleges and universities. Any possible forced marriage case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

### **Preventing Radicalisation**

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). Young people can be exposed to extremist influences or prejudiced views, in particular those via the internet and other social media. Schools can help to protect children from extremist and violent views in the same ways that they help to safeguard children from drugs, gang violence or alcohol.

Examples of the ways in which people can be vulnerable to radicalisation and the indicators that might suggest that an individual might be vulnerable:

- 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; their 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.
- Example indicators that an individual has an intention to 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.
- Example indicators that an individual is capable of contributing directly or indirectly to an act of terrorism include: having a history of violence; being criminally versatile and using criminal networks to support extremist goals; having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction); or having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).

The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability. We see the Prevent duty as part of our school's wider safeguarding obligations and note the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76.

**Channel** is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism that uses existing collaboration between local authorities, the police, statutory partners (such as the education sector, social services, children's and youth services and offender management services) and the local community.

We will refer children at risk of harm as a result of involvement or potential involvement in extremist activity to Southwark Multi Agency Safeguarding Hub ([MASH](#)). The MASH will share the referral details of new referrals with the Prevent lead police officer and LA Prevent coordinator at the point the referral is received. The referral will then be processed through the MASH multi agency information sharing system and parallel to this the Prevent police officer will be carrying out initial screening checks. The Prevent police officer will make a referral to the Channel Practitioner if there are sufficient concerns. The individual referred will be discussed at the Channel panel to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from our school will attend the Channel panel if and when we are asked to help with this assessment.

### **Private Fostering**

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage). Great grandparents, great aunts, great uncles and cousins are not regarded as close relatives.

The law requires that the local authority should be notified if anyone is looking after someone else's child for 28 days or more. The purpose of the council's involvement is to support the child and private foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration or emotional issues such as keeping contact with biological family, maintaining cultural identity.

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If we become aware of a child in a private fostering arrangement within Southwark, we will notify the council's Multi Agency Safeguarding Hub ([MASH](#)) by emailing [MASH@southwark.gov.uk](mailto:MASH@southwark.gov.uk) or calling **020 7525 1921**. Advice about whether there is a need to notify the council, can be obtained by calling **07539 346808** or sending an email to [privatefosteringadvice@southwark.gov.uk](mailto:privatefosteringadvice@southwark.gov.uk). In the case of a non-Southwark child, we will notify the relevant LA.

## **Appendix 2. Further information on Child-on-Child abuse, including investigation procedure**

We recognise that children are capable of abusing or exploiting other children. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

We also recognise the gendered nature of child on child abuse. However, all child on child abuse is unacceptable and will be taken seriously.

### **Creating a supportive environment in college and minimising the risk of child-on-child abuse**

We know the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate students about appropriate behaviour and consent
- Ensure students are able to easily and confidently report abuse using our reporting systems (as described below)
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child's behaviour might indicate that something is wrong
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
  - That a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

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- The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it
- That they should speak to JNO/DFR if they have any concerns

Most cases of students hurting other students will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in the school at risk
- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation, sexual violence or sexual harassment (further explanation below)

**Sexual violence** – Rape, assault by penetration, sexual assault (covers a wide range of behaviours, e.g., kissing someone without their consent or touching someone's bottom/breasts/genitalia without consent, can constitute sexual assault), causing someone to engage in sexual activity without consent. **Sexual harassment** – Unwanted conduct of a sexual nature that can occur online and offline and both inside and out of the college. E.g., sexual comments such as making sexual remarks about someone's appearance, physical behaviour such as deliberately brushing against someone or displaying drawings of a sexual nature, online sexual harassment such as sharing sexually inappropriate photos or videos (including the sharing of nudes and semi-nudes).

**Please remember, the above are examples, not an exhaustive list.**

#### **Staff procedures for dealing with allegations of child-on-child abuse**

If a student makes an allegation of abuse against another student of the above nature:

- You must record the allegation on CPOMS and tell JNO/DFR, but do not investigate it
- JNO/DFR will discuss with onsite Social worker and/or contact MASH and follow their advice, as well as the police if the allegation involves a potential criminal offence
- JNO/DFR will put a risk assessment and support plan (template included below) into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed

If you are made aware of an incident involving the consensual or non-consensual **sharing of nude or semi-nude images/videos** (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to JNO/DFR immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to JNO/DFR)
- Delete the imagery or ask the student to delete it
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the student(s) that they will receive support and help from JNO/DFR.

#### **Reporting systems for our students**

Where there is a safeguarding concern, we will take the student's wishes and feelings into account when determining what action to take and what services to provide.

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We recognise the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for students to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for students
- Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Students can report a concern whether it is about themselves or someone else to any member of staff that they feel comfortable with but are encouraged to go straight to JNO/DFR.
- If a disclosure is made to a member of staff, they will inform the student(s) that they will have to pass the information onto JNO/DFR, who will then speak to the student(s) to go through the disclosure.
- When JNO/DFR speak to a student/s about a disclosure that is serious and/or of a sexual nature they will both be present or another member of staff will be present if only one of the safeguarding team are available.
- JNO/DFR will make the next steps clear, they will explain that they cannot promise confidentiality as they may have to share the concern further, for example with children's social care and/or the police. They will also explain how the report will be progressed.
- JNO/DFR will inform parents/carers (unless this would put the victim at greater risk).
- Following a report of sexual violence or other serious safeguarding concerns being made, JNO/DFR will complete a risk assessment considering the victim, the alleged perpetrator and other students (and, if appropriate, staff).
- All student(s) involved in the report will be supported after the initial report has been made.

**Students will be made aware of how they can make a report through CPSHE, assembly at the start of term, reminders from tutors/LOL and the safeguarding team.**

### **Serious Safeguarding concern report procedure**

1. Incident occurs/Disclosure is made
2. As soon as it is evident that the incident is of a safeguarding concern it is referred to JNO/DFR.
3. JNO/DFR will speak to student(s) involved in the incident separately, they will reassure the student(s) and ask them to explain what has happened. They will then ask the student(s) to write an incident report.
4. JNO/DFR will ask if there are any witnesses who were not directly involved in the incident. They then speak to them about the incident and ask them to write an incident report.
5. Depending on where an incident has occurred, JNO (other appropriate senior staff) may check CCTV and student electronic devices.
6. JNO/DFR speak through the written incident reports with the student(s) that wrote them and may bring up information from other incident reports when questioning a student about theirs.
7. If through any of the conversations there are found to be inaccuracies and/or information left out, students will be asked to add all information to their incident report and amend any information that has been shown to be untrue. Students should sign their incident report.

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8. JNO/DFR will then clarify that everything is included on the written report and sign the report.
9. JNO/DFR will inform the Principal and may make a referral to the onsite social worker and/or the MASH team and/or the Police.
10. Based on conversations, written reports and any other information/evidence, JNO/DFR may re-question a student(s).
11. JNO/DFR will contact parents to inform them of the incident/disclosure (unless this would put the victim at greater risk), they may request that parents come into college to meet.

### **Additional notes.**

- During investigations all communication devices will be removed from students whilst the investigation is on-going.
- Electronic devices will be stored and returned at the end of the college day, they will not be checked without the student's knowledge and will only be checked if the incident is in breach of the College E-Safety policy or if there is reason to believe that there is a safeguarding or legal concern. If this is the case, an electronic device may not be returned at the end of the day (see Mobile phone policy for further information).
- During an investigation, students may be taken out of circulation, they may be placed in the APB, a LOL/SLT office or elsewhere. If there is a report of rape and/or assault by penetration whilst we establish the facts and start the process of liaising with children's social care and the police, the alleged perpetrator will be removed from any classes that they share with the victim. Measures will also be taken to minimise any potential contact throughout the college day.
- For all other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) will be considered in terms of shared classes, college premises and journeys to/from the college.
- **These actions are in the best interests of all students involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s).**
- Investigations may take place over several days, JNO/DFR will do their best to have gathered all evidence as quickly as possible whilst also dedicating the appropriate amount of time to a fair investigation and minimising time out of lesson.



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### **Appendix 3. St. Michael's Safeguarding Training Plan 2024-25**

\*Please note, this is a plan and therefore subject to change.

#### **St. Michael's Safeguarding Training Plan 2024-25**

<b>Date</b>	<b>Type</b>	<b>Staff involved</b>	<b>Notes</b>
2/9/25  Assessment to be completed by <b>9/9/24</b>	- KCSIE Part 1 provided to all staff - New academic year training on SG at St. Michael's (delivered by DSL & DDSL). - All staff complete assessment on KCSIE (electronically)	All teaching & support staff	
2/9/25	Safeguarding reminders specific to staff on reception, e.g. visitor procedures and phone referrals	Admin Team	
<b>By 9/9/24</b>	- KCSIE Annex A - New academic year training on SG at St. Michael's	Premises	
<b>By 13/9/24</b>  Assessment to be completed by <b>13/9/24</b>	- KCSIE Part 1 provided to all staff - New academic year training on SG at St. Michael's (delivered by DSL). - All staff completed assessment on KCSIE (electronically)	Peripatetic staff	
<b>TBC</b> Check ITT schedule with RKE	SG team and/or RKE to deliver training on SG practice and protocols at St. Michael's.  New staff throughout the year as part of their induction.	New staff and ECTs	
24/10/24	<a href="#">SG briefing</a> <a href="#">Theme: Staff online safety</a>	All Teachers, TAs & technicians	
25/10/24	<b>Pastoral Inset</b> Session/e-learning Theme: Preventing Radicalisation		
7/11/25	<a href="#">SG agenda point, JNO to go through:</a> <a href="#">SG 2023-24 report - Referrals/Assessments/CIN/CP/FEH</a> <a href="#">Update to KCSIE and explanation of staff training</a>	<b>Govs Welfare committee</b>	
<b>Wk beg. 18/11/24</b>	<b>SLT Review</b> SG Focus: TBC	Students, staff, parents & governors	
21/11/24	<a href="#">SG briefing</a> <a href="#">Theme: Bullying (Anti-Bullying wk: 11-15th Nov)</a>	All Teachers, TAs & technicians	
12/12/24	<a href="#">SG briefing</a> <a href="#">Theme: FGM/cutting</a>	All Teachers, TAs & technicians	
<b>TBC</b>	Virtual meeting to go through SG update	<b>Jo Nottage &amp; Janice Babb</b>	
<b>TBC</b>	SG consultation (John Guest) and update	<b>Jo Nottage &amp; Debbie Freegard</b>	
9/1/25	<a href="#">SG briefing</a> <a href="#">Theme: Start of term SG reminders</a>	All Teachers, TAs & technicians	
30/1/25	<a href="#">SG briefing</a> <a href="#">Theme: Online Safety</a> <a href="#">Safer Internet day - 11/2/25</a>	All Teachers, TAs & technicians	
27/2/25	<a href="#">SG briefing</a> <a href="#">Theme: Children missing education - scenario*</a>	All Teachers, TAs & technicians	
27/2/25	<a href="#">SG agenda points - TBC</a> <a href="#">SG 2023-24 T1 report - Referrals/Assessments/CIN/CP/FEH</a>	<b>Govs Welfare committee</b>	

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<b>27/3/25</b>	SG briefing Theme: Types of Abuse, specific topic TBC	All Teachers, TAs & technicians	
<b>TBC</b>	SG consultation (John Guest) and update	<b>Jo Nottage &amp; Debbie Freegard</b>	
<b>TBC</b> T2: between Jan-Mar	Meeting to go through SG update	<b>Jo Nottage &amp; Janice Babb</b>	
<b>25/4/25</b>	SG briefing Theme: Start of term SG reminders	All Teachers, TAs & technicians	
<b>15/5/25</b>	SG briefing Theme: Mental Health MH awareness wk 12-18 May	All Teachers, TAs & technicians	
<b>5/6/25</b>	SG briefing Theme: Types of Abuse, specific topic TBC	All Teachers, TAs & technicians	
<b>12/6/25</b>	SG agenda points - TBC SG 2024-25 T2 report - Referrals/Assessments/CIN/CP/FEH	<b>Govs Welfare committee</b>	
<b>3/7/25</b>	SG briefing Theme: Sexual Abuse - scenario*	All Teachers, TAs & technicians	
<b>TBC</b> T3: between Apr-Jul	SG consultation (John Guest) and update	<b>Jo Nottage &amp; Debbie Freegard</b>	
<b>TBC</b> T3: between Apr-Jul	Meeting to go through SG update	<b>Jo Nottage &amp; Janice Babb</b>	

\*Please note, this is a plan and therefore subject to change.