

CONCORD COLLEGE

SAFEGUARDING AND CHILD PROTECTION POLICY & PROCEDURE CONCORD SUMMER SCHOOL

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Introduction

At Concord Summer School we believe that it is always unacceptable for a child or young person to experience abuse of any kind and recognise that safeguarding the welfare of **all** children and young people is everyone's responsibility. We follow Shropshire Safeguarding Children Board (SSCB) procedures and acknowledge that the welfare of the child is paramount. This policy and procedure document is based on the latest model provided by the SSCP (-formerly the SSCB) and is updated and reviewed as necessary to include changes in guidance such as KCSIE Sept 2022 ("Keeping Children Safe in Education"). Concord Summer School adopts a whole College approach to safeguarding and child protection so that the best interests of children are at the forefront and underpin all that we do.

Concord Summer School believes that it has a central role and responsibility in caring for the welfare of its students and in both preventing and protecting our students from abuse. All staff share the duty of care to promote the welfare of the child so that actions are taken in the child's best interests and concerns are acted upon immediately.

Given that the majority of students at Concord Summer School are boarders from overseas, most Concord students can be deemed "vulnerable" to possible abuse due to living and working away from their previous support networks of families and friends. For this reason, **all** adults (i.e. staff, trustees & volunteers) working at Concord Summer School should be particularly conscious of the importance of maintaining caring, but professional relationships with students. All members of the College community should seek to: listen to others' views; respect their views and differences; be open about their feelings; share their concerns promptly; behave appropriately at all times. (For more information, see the "Staff Conduct Policy" in the Appendices to Contract.) Concord Summer School staff should be prepared to "think the unthinkable" and be vigilant to the risk that abuse "could happen here".

In addition, given the age range of Concord Summer School's students and its co-educational and diverse student body, there is also the potential for students to experience peer-on-peer abuse (or bullying, cyberbullying, gender based violence, sexual assaults, sexting) at the hands of their peers. Farrar & Co published (Dec 2017) a useful "Peer-on-peer abuse toolkit" document which has been saved in the Staff Handbook. (Page 9 usefully distinguishes between types of Harmful Sexual Behaviours or HSB: normal, inappropriate, problematic, abusive & Violent. Page 11 contains a useful list of potential signs of peer-on-peer abuse.) A definition of peer-on-peer abuse is offered as follows on p7: "...any sign of physical, sexual, emotional & financial abuse, and coercive control between children and within children's relationships". For these reasons, particular vigilance is needed by **all** adults who work at Concord Summer School and they should be prepared to deter, detect, share information about and act upon any concerns about possible abuse in a timely manner. Emotional reactions should not be ignored and a child's wishes should be taken into account, in so far as this is possible, when determining what action to take and which services to provide. Incidents and concerns should not be dismissed as "banter" or "a normal part of growing up". Worries about students should be acted upon and raised as "initial concerns" which require early help from internal and/or external agencies. (-See below for procedures and Appendix I for possible signs of Peer-on-peer abuse.) The safeguarding of students and all members of the College community should be a priority for and the responsibility of **every member of staff** whenever and wherever they are covered by the College's duty of care (-including when they are on a school trip or visit). In addition, every member of staff should be aware of the possible safeguarding issues presented by drug taking, alcohol abuse, truanting, sexting.

The procedures below relate to the care of all students who are under 18 years of age. Many welfare needs of students can be met by the pastoral structures within the College in terms of its listeners & medical staff, but some students' problems are more complex & serious and can originate beyond the limits of the College. The College also recognises that it has a "duty of care" to all of its students.

At Concord Summer School it is our duty to respond promptly and appropriately to all concerns, incidents or allegations of abuse or neglect of a child. All concerns and allegations will be taken seriously by the College and we will work in partnership with children, young people, their parents, carers and other agencies.

Under this policy the College will: operate safe recruitment, selection & vetting procedures for all staff, trustees and volunteers; require the DSL ("Designated Safeguarding Lead") & safeguarding team to receive training in child protection and inter-agency working, which shall be updated every two years; require the Principal and all staff to receive training in child protection, which shall be updated regularly (& at least annually), as well as receiving regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings; require that any deficiencies or weaknesses in safeguarding & child protection arrangements be remedied without delay.

At Concord Summer School we recognise that all children, regardless of who they are or where they are from have the right to protection from all types of abuse. No child or group of children in our Summer School will be treated any less favourably by us than others in being able to access their right to education or other services and support that we are reasonably able to provide or to access for them for the purposes of safeguarding and promoting their welfare. This may mean that additional positive actions and/or safeguards may be taken by us to ensure the individual and/or groups of children are not disadvantaged from receiving education or services or disproportionately subjected to abuse.

Our statutory duties and supporting guidance are set out in "Working Together to Safeguard Children" (Feb 2019) and "Keeping Children Safe in Education" (Sept 2022). This policy is also compliant with current relevant legislation & guidance as follows:

- **The Children Act 1989 and 2004** - Safeguarding and promoting the welfare of children is defined as; protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care and undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

Section 3 (5) of the Children Act 1989 states that the law empowers anyone who has care of a child to do all that is reasonable in the circumstances to safeguard his/her welfare.

- **Counter-terrorism and Security Act 2015** – preventing people being drawn into terrorism and promotion of British values to ensure children are kept safe from radicalisation
- **Female Genital Mutilation Act 2003 – Serious Crime Act 2015** - mandatory reporting of FGM from 31st October 2015
- **The Statutory Framework for the Early Years Foundation Stage (EYFS) 2021**
- **The Ofsted Compulsory Childcare Register**
- **Shropshire Safeguarding Community Partnership Threshold Guidance**
- **West Midlands Child Protection Procedures**
- **Human Rights Act 1998** – it is unlawful for schools or colleges to act in a way that is incompatible with the European Convention on Human Rights (the Convention) that apply in the UK
- **Equality Act 2010** – Compliance with the Public Sector Equality Duty (PSED) is a legal requirement for schools and colleges that are public bodies. Schools that are public bodies have a general duty to have regard to the need to eliminate unlawful discrimination, harassment, and victimisation, to advance equality of opportunity between different groups and to foster good relations between different groups. The duty applies to all protected characteristics and means that whenever significant decisions are being made or

policies developed, thought must be given to the equality implications such as, for example, the elimination of sexual violence and sexual harassment.

The Public Sector Equality Duty (as required by s149 of the Equality Act) applies to Concord Summer School and we refer to the Equality Act 2010: Government advice for schools.

Adult Roles

All staff (including students and volunteers) at Concord Summer School are familiar with the definitions and indicators of abuse or neglect and Safeguarding Issues as outlined in Keeping Children Safe in Education 2022 and West Midlands Child Protection Procedures. Staff understand and are alert to the fact that children can be at risk of harm inside and outside of the summer school, inside and outside of home and online.

All staff are aware of their individual roles in safeguarding and promoting the welfare of children including their responsibility to be alert to any issues for concern in the child's life at home or elsewhere. We ensure that all staff (including students and volunteers) undergo an induction process where they are given copies of the procedures they must follow if they suspect abuse or neglect. Safeguarding training is delivered face-to-face by the DSL as part of induction and INSET at the beginning of each Summer School Course and goes beyond level 1 awareness training of the SSCP.

Induction training will provide all Summer School staff with knowledge of:

- The Summer School's Safeguarding and Safeguarding Protection Policy (incl. the role and identity of the DSL and safeguarding team – as shown in the table below, whistleblowing, on-line safety, responses to CME or children who go missing from education)
- KCSIE Sept 2022. Part 1 of KCSIE must be read by all staff working directly with children
- The Staff Code of Conduct Policy (inc. Staff-student relationships & appropriate methods of communication)
- Behaviour & Discipline Policy (Student)
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Online training (provided by TES Educare) is also required of staff with access to the College network. On-going support is provided through regular supervision and appraisals to ensure these policies and procedures are put into practice to protect children.

The Designated Safeguarding Lead (DSL) who will take the lead for safeguarding and child protection issues is:

Kathryn Weaver Assistant Director (Pastoral) & Designated Safeguarding Lead	Internal 'phone numbers: Office = 135 Home = 193 SummerDSL@concordcollege.org.uk
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The Boarding Manager is:

Rebecca McBain	Internal 'phone numbers: Office = 135 Home = 275 SummerDSL@concordcollege.org.uk
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The Trustee who oversees this work is the Chairperson of the Welfare Committee:

Mr Brian Yates Chair of the Trustees' Welfare Committee	Via e-mail: B.Yates@concordcollege.org.uk
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Our Designated Safeguarding Lead will update their child protection/safeguarding training every two years (for school settings) and has specific responsibilities as listed in **Appendices A and B**

Information Sharing and Record Keeping

When a concern about a child's welfare or safety is raised it will be discussed with the designated lead and recorded in SchoolBase. If a serious concern or allegation is raised, the DSL will call a meeting of the Safeguarding Incident Team (or SIT - consisting of the DSL, the Boarding Manager and the Director of Studies. All SIT members will receive level 3 safeguarding training every two years. If a serious concern is raised, Barnardo's and/or the NSPCC are likely to be consulted for advice. They will discuss the concern and make a decision about whether the concern should be shared with another agency (see **decision making** below) or kept on record in case future concerns arise. The reason for the decision will be noted alongside the record. The Summer Course Director will be informed of decisions taken by the SIT.

If a serious incident is under consideration, contact will be made with the College's legal advisers (Farrer & Co) & key areas for discussion will be: steps needed to safeguard the individual (or individuals) involved; actions needed to safeguard other members of the community; any issues involving requests for confidentiality & whether these should be overridden; any risk assessments and action plans needed.

All records will be stored in a separate confidential file in a locked, secure place with restricted access.

Information is shared as necessary to protect children from harm. We follow the guidance in the HMG 2018 guide '*Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers*' and the and the Department for Education 2015 guide '*What to do if you are worried a child is being abused*'.

Staff should be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care. Governing bodies and proprietors are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulations (UK GDPR) places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

The Data Protection Act 2018 and UK General Data Protection Regulations **do not** prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the DSL or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

When information is being accumulated prior to possible referral, SchoolBase will be used to record concerns and events and a separate chronology of events might also be started – see **Appendix D**. The designated lead will regularly review SchoolBase records and/or chronologies to decide if the accumulation of events is having a detrimental impact on a child and must be referred to Compass. If the designated lead decides not to refer, the reason will be noted on the child's SchoolBase records.

Decision making – 'Accessing the right service at the right time'

We take a holistic approach to safeguarding all children in our care and recognise that different families need a different level of support at different times. To enable us to recognise at which level a family might require support; we use the Shropshire Safeguarding Children Board's *Multi-agency Guidance on Threshold Criteria to help support Children, Young People and their Families in Shropshire*. [Shropshire Threshold Document](#).

The DSL and relevant staff must familiarize themselves with the Threshold document and should access relevant Shropshire Council Early Help training and support to enable them to understand the Thresholds Document and support the local multi-agency approach to early help assessment.

This guidance identifies four levels to ensure all children receive the support and intervention they need to achieve a positive life experience. Of central importance in understanding where a child's needs might lie on this continuum, is the cooperation and engagement of parents and carers and we aim to develop good, professional relationships to ensure that we have a shared understanding of each child's needs.

It should be noted that if parents demonstrate a lack of co-operation or appreciation about the concerns we identify this may, in itself, raise the level of the need and required level of action.

Just because a child is assessed at a point in time as meeting certain threshold criteria does not mean that they always will. An assessment is an on-going process, not an event; children's needs often change over time.

The Designated Lead for Safeguarding will maintain an overview of all children with a plan to ensure children's needs are being met at the right level of intervention.

Level 1 – Universal

Children with no additional needs and where there are no concerns. Typically, these children are likely to live in a resilient and protective environment where their needs are met. These children will require no additional support beyond that which is universally available.

Consent must be sought to access services and share information with others. Any information sharing between agencies without consent must be clear as to its legal basis.

Ensure privacy information is shared with the family and a consent form completed.

Support is provided by services identified as universal in local communities and are available to all. These include: Schools, colleges, early years and childcare provision, primary healthcare provision (i.e. GP, hospitals), and the voluntary and community sector.

Universal support will most likely be provided by a single agency and/or existing support from family, friends and the community.

It is these Universal Services who are best placed to ensure children and families have access to the Early Help Offer. The needs of the child/young person are appropriately met within this framework.

Level 2 – Children in need of Early Help

These children can be defined as needing some additional support without which they would be at risk of not meeting their full potential. Their identified needs may relate to their health, educational, or social development, and are likely to be short term needs. If ignored these issues may develop into more worrying concerns for the child or young person. In addition to the Whole Family Assessment, specific local tools and pathways should be used where there are concerns about possible harm to the child. Early Help aims to provide a multi-agency response when a single agency is not able to progress and help the child and their family. The existing single agency or multi-agency team should work with the family and each other to complete a Whole Family Assessment and Action Plan.

At this stage, a lead professional/practitioner should be identified who can build a relationship with the whole family and ensure the whole family's needs are met and actions progressed. Consent must be sought to access services and share information with others. Any information sharing between agencies without consent must be clear as to its legal basis. Ensure privacy information is shared with the family and a consent form is completed.

Level 3 – Targeted Early Help

This level applies to those children identified as requiring targeted support and who meet at least 2 of the 6 Strengthening Families Criteria in the Whole Family Assessment. . It is likely that for these children their needs and care are compromised. These children will be those who are vulnerable to harm or experiencing adversity. In addition to the Whole Family Assessment, specific local tools and pathways should be used where there are concerns about possible harm to the child. These children are potentially at risk of developing acute/complex needs if they do not receive targeted early help.

If a child continues to have unmet needs which can not be met by Universal or Early Help support, then the existing single agency or multiagency team should work with the family and each other to review the Whole Family Assessment and Action Plan and follow the Request for Intervention Pathway to request more intensive family support from a Targeted Early Help Family Support Worker.

Consent must be sought to access services and share information with others. Any information sharing between agencies without consent must be clear as to its legal basis. Ensure privacy information is shared with the family and a consent form completed.

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Level 4 – Complex Significant Needs

These are children whose needs and care at the present time are likely to be significantly compromised and or they are suffering or likely to suffer significant harm and so who require intervention from Shropshire Council Children's Social Care.

An immediate referral to Compass should be made for assessment under Section 17 or Section 47 of the Children Act 1989. Specific local tools and pathways and the Shropshire Threshold Matrix should be used to support their referral and help practitioners to assess significant harm to the child.

Child in Need

Section 17 of the Children Act 1989 states that a child shall be considered in need if:

- They are unlikely to achieve, maintain or have the opportunity of achieving or maintaining a reasonable standard of health or development without the provision of services by a local authority
 - Their health and development is likely to be significantly impaired, or further impaired, without the provision of such services.
- And/or
- They are disabled.

Consent must be sought to access services and share information with others. Any information sharing between agencies without consent must be clear as to its legal basis. Ensure privacy information is shared with the family and a consent form completed.

Child Protection

Section 47 of the Children Act 1989 states that the local authority shall make necessary enquiries to enable them to decide whether they should take action to safeguard or promote the child's welfare where there is reasonable cause to suspect a child is suffering or likely to suffer significant harm. Where it is suspected that a child is suffering or likely to suffer significant harm; referring practitioners must inform patients or carers that they are making a referral to Compass, and seek consent unless to do so may:

- Place the child at increased risk of significant harm; or
- Place any other person at risk of injury; or
- Obstruct or interfere with any potential Police investigation; or
- Lead to unjustified delay in making enquiries about allegations of significant harm.

Guidance for assessment practice can be found on page 13 of the Shropshire Threshold Document

(Taken from: Shropshire Safeguarding Community Partnership Multi-agency Guidance on Threshold Criteria to help support Children, Young People and their Families in Shropshire 2021) [Shropshire Threshold Document](#).

Partnership with families

A copy of this policy is made available to all parents via the College website as well as details of the complaints procedure. In general any concerns will be discussed with parents and we will offer support.

All conversations, whatever the outcome, should be recorded appropriately in order to show that they took place, identify what was agreed and evaluate how effectively they enabled needs to be met. In this way quality conversations can demonstrate their impact on successful practice, including improvements in decision making and joint working. Conversations should continue in order to inform the on-going planning and reviewing.

Practitioners working with families at a Universal, Early Help or Targeted or Child in Need level will need to obtain the consent of the family before any information is held or shared with other agencies. Any information sharing between agencies without consent must be clear as to its legal basis.

If the practitioner does not gain the family's consent and in future has ongoing concerns, they should refer to local tools and pathways available via [West Midlands Child Protection Procedures](#) and consider contacting Compass for advice and guidance. Except for child protection matters, referrals to Compass cannot be accepted without parents having been consulted first.

With the exception of child protection matters, referrals to Compass cannot be accepted without parents having been consulted first.

Consent is not required for child protection referrals where it is suspected that a child may be suffering or be at risk of suffering significant harm; however, the referring practitioner, would need to inform parents or carers that you are making a referral, unless to do so may:

- Place the child at increased risk of Significant Harm; or
- Place any other person at risk of injury; or
- Obstruct or interfere with any potential Police investigation; or
- Lead to unjustified delay in making enquiries about allegations of significant harm.

The child's interest must be the overriding consideration in making such decisions. Decisions should be recorded. If consent is withheld by the parent:

- If it is felt that the child's needs can be met through Early Help, then discussion with the family should take place about the completion of an Early Help Assessment and provision of services through an Early Help Plan. Early help consultations are available from the Early Help Advisors for support in managing these situations.
- For another agency familiar with the child and family to make the approach about information sharing to the family.
- No assessment should take place. The rationale for this decision will be recorded on the concerns form.
- The combination of the concerns and the refusal to consent to enquiries being made may result in the concerns being defined as child protection concerns. In this case, information sharing may proceed without parental consent. The consultation and the decision to proceed without consent must be recorded on the case papers.

If a child has actually been injured or is in imminent danger of being injured then we will contact the emergency services, medical or police, immediately on 999.

When making a level 4 referral to Compass we will ensure we have a record of all details required detailed on a [Shropshire Multi-Agency Referral Form](#).

Specific legal duties to report

New legislation has recognised and criminalised the following types of abuse and placed duties on education settings to report offences to the authorities:

- **Radicalisation and the Prevent Duty**

The government set out its definition of British values in the 2011 Prevent Strategy – this promotes the values of:

- Democracy
- the rule of law
- individual liberty
- mutual respect
- tolerance of those of different faiths and beliefs

Our College promotes these values to ensure that children build resilience in respect of the Prevent Duty and promotes tolerance and harmony between different cultural traditions. Concord Summer School provides a broad and balanced curriculum which promotes the spiritual, moral and cultural development of students and prepares them for the opportunities, responsibilities and experiences of life.

Concord recognises its duty to promote fundamental British values and protect all members of its community from extremism and being drawn into both violent and non-violent forms of terrorism. The College aims to provide a safe place in which young people can understand and discuss sensitive topics, including terrorism and extremist ideas that are a part of terrorist ideology. The College has filters in place to ensure that students are safe from terrorist and extremist material on the internet as well as educating its students about internet safety.

If a member of staff has a concern about a particular pupil/s they should follow the school's normal safeguarding procedures, including discussing with the school's designated safeguarding lead as set out in the Child Protection/safeguarding policy.

The designated lead should refer to the [Shropshire Safeguarding Community Partnership Child Exploitation Practice Guidance and Protocol](#) (Preventing Terrorism)

Prevent referrals should be sent to ctu_gateway@westmidlands.police.uk

If uncertain about whether threshold is met for a Prevent referral, contact West Mercia Police on 01386 591821 for a consultation

For assistance with completion of a Prevent referral form, contact the West Midlands Prevent hub 0121 251 0241

Prevent Engagement Officer, West Mercia Police is DC Holly Aungiers – 01386 591815

- **Domestic abuse and honour-based abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. It can take place between individuals ages 16 years and over who have a "personal connection" (as defined by the Domestic Abuse Act 2021)

So called "honour"- based abuse (including female genital mutilation (below) and forced marriage) may also be considered as domestic abuse.

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

We will seek support for victims and their children by following:

- [Shropshire Safeguarding Community Partnership Domestic Abuse Pathway](#)
- [The right to choose: government guidance on forced marriage – GOV.UK \(www.gov.uk\)](#)
- [Multi-agency statutory guidance on female genital mutilation – GOV.UK \(www.gov.uk\)](#)

Depending upon the level of risk, we may or may not consult parents before contacting Compass.

- **Female Genital Mutilation (FGM)**

Whilst all staff should speak to the designated safeguarding lead (or deputy) about any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, during their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must personally report this to the police.

All teachers will be aware of and adhere to the Government Guidance on [Mandatory reporting of female genital mutilation: procedural information](#)

For more information about FGM, please refer to: <https://www.gov.uk/government/publications/female-genital-mutilation-leaflet>

Parental consent may not be sought if this may put the girl at increased risk.

College staff should be aware of possible indicators that FGM is likely to occur, or has occurred. Please refer to Appendix K at the end of the document for a list of possible signs that FGM is likely to occur, or has occurred.

Abuse, Neglect and specific safeguarding issues

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

Abuse is defined in statutory guidance (Keeping Children Safe in Education 2022) as:

- A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm.
- Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.
- Abuse can take place wholly online, or technology may be used to facilitate offline abuse.
- Children may be abused by an adult or by another child or children.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside of summer school and/or can occur between children outside of these environments. All staff, but especially the DSL and deputy DSLs should consider whether children are at risk of abuse and exploitation in situations outside of their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms (but not limited to) sexual exploitation, criminal exploitation, radicalisation and serious youth violence. Please see: [Contextual Safeguarding](#)

Staff are made aware of the four main categories of abuse and other specific forms of abuse and safeguarding issues (such as those outlined in the table below) through child protection training, reading up to date guidance such as Keeping Children Safe in Education 2022.

Staff should exercise professional curiosity to be able to identify children who may need to help or protection.

Concord Summer School ensures that the DSL is continually updated in all areas below. They are familiar with the referral pathways and specific toolkits and guidance on [West Midlands Child Protection Procedures](#), and training available on the [Shropshire Safeguarding Community Partnership](#) websites.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), and consensual and non-consensual sharing of nudes and semi-nude images and/or videos ([UKCIS](#)) can be signs that children are at risk.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools, colleges and early years settings can be found on the TES, MindEd and the NSPCC websites.

Staff can access government guidance as required on the issues listed below via [Keeping Children Safe in Education 2022](#), [West Midlands Child Protection Procedures](#) and other government websites as well as through continuing professional development.

Specific Forms of Abuse	Safeguarding Issues
<p><u>Four main categories</u></p> <ul style="list-style-type: none"> • Emotional Abuse • Physical Abuse • Neglect • Sexual abuse and exploitation (including sexual violence and sexual harassment between children) <p><u>Other types of abuse</u></p> <ul style="list-style-type: none"> • Abuse motivated by Hate (hate related incidents with be reported to Shropshire Council using the Hate related Incident Reporting Form) • Abuse linked to faith or belief • Child abduction and community safety incidents • Child-on-child abuse (see below) • Child exploitation (including criminal and sexual exploitation) • Cybercrime (including cyberbullying) • Domestic Abuse • Gender based abuse/violence against women and girls • Fabricated or induced illness 	<ul style="list-style-type: none"> • Child missing from education, home or care • Children and the court system • Children with family members in prison • Drug and/or alcohol use (parental or child) • Extremism • Health and Wellbeing (parental or child). Includes medical conditions, physical health, mental health. • Homelessness • Private fostering arrangements • Serious violence

<ul style="list-style-type: none"> • Modern Slavery (including Trafficking) • Online Abuse • Radicalisation • So-called honour-based abuse (including Female Genital Mutilation and Forced Marriage) 	
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All staff are made aware that mental health problems can, in some cases, be an indicator of abuse. The Safeguarding team works closely with the College’s medical team. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the child protection policy and speaking to the DSL or a deputy. The [Mental Health and Behaviour in Schools guidance](#) sets out how schools and colleges can help prevent mental health problems by promoting resilience as part of an integrated, whole school/college approach to social and emotional wellbeing, tailored to the needs of their pupils.

Child on child abuse (formerly known as peer on peer abuse)

Staff should recognise that children can abuse other children, and that it can happen both inside and outside of Concord Summer School; at home or someone else’s home, in public spaces and online.

It can take place in spaces which are supervised or unsupervised. Within a school context, for example, child-on-child abuse might take place in spaces such as toilets, the playground or corridors. All staff should understand, that even if there are no reports in Concord Summer School, it does not mean it isn’t happening, it may be the case that it is just not being reported.

For more detailed guidance, see Concord Summer School’s Anti-Bullying Policy in the Staff Handbook and Farrer & Co’s “Peer-on-peer abuse toolkit” in the Staff Handbook.

As Concord College is a member of the BSA (or Boarding Schools’ Association), it is required to inform the BSA of an allegation of peer on peer abuse for any students who are also on role for the coming academic year in Concord College. Under the BSA’s Commitment to Care Charter (v.2 published Sept 2017), the BSA will be informed that an incident has occurred and which statutory agencies are involved. Contacts are as follows: Dale Wilkins, Head of Safeguarding and Standards at the BSA: dale@boarding.org.uk (Tel. no. 07905 127 650) or email safeguarding@boarding.org.uk

Examples of child on child abuse are listed below.

At Concord Summer School we understand that even if there are no reports of child on child abuse, that such abuse may still be taking place. We want to create a safe environment for children that does not accept abusive behaviour and encourages children to report to staff when they witness or experience it. As such, staff will take a zero tolerance approach to abuse. They will challenge inappropriate behaviours between children that are abusive in nature. They should not downplay abusive behaviour by children towards other children, such as passing it off as “banter” or “part of growing up”.

Children who experience or witness child on child abuse will have any concerns they raise taken seriously. Children experiencing, causing or who witness child on child abuse will be supported and protected to ensure their needs are met and they are effectively safeguarding, in accordance with this policy.

Staff are aware that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in personal intimate relationships between children (sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment
- Causing someone to engage in sexual activity without consent such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff should be familiar with:

- Part 5 Keeping Children Safe in Education 2022: Child on child sexual violence and sexual harassment
- [Sharing nudes and semi-nudes: how to respond to an incident \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/612222/Keeping-Children-Safe-in-Education-2022-Part-5-Child-on-child-sexual-violence-and-sexual-harassment.pdf)

Concord Summer School will respond to an incident of child on child abuse by recording the incident on a Concern Reporting Form (Appendix E)

Child on child sexual violence and sexual harassment

Where there are concerns of child on child sexual violence or sexual harassment, Concord Summer School will follow the below pieces of Government Guidance as set out in:

- Part 5 of Keeping Children Safe in Education 2022: Child on child sexual violence and sexual harassment
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people – GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/612222/Keeping-Children-Safe-in-Education-2022-Part-5-Child-on-child-sexual-violence-and-sexual-harassment.pdf)
- [Searching, screening and confiscation at school – GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/612222/Keeping-Children-Safe-in-Education-2022-Part-5-Child-on-child-sexual-violence-and-sexual-harassment.pdf)

In summary the process and procedures for managing a sexual violence or sexual harassment incident are:

Whole school approach:

Pre-planned risk assessment proforma in place

Training for staff on how to report incidents

Training on how to manage reports

Child on child abuse policy in place

Responding to a report:

Victims are reassured, supported and kept safe

Record the concern

Inform the DSL if not involved in the initial report

Risk Assessment:

Risk assessment for victim

Risk assessment for alleged perpetrator

Risk assessment for all other children involved (including any necessary support for siblings)

Initial consideration of children sharing a classroom and/or having direct contact in school

Support:

Support for victim and alleged perpetrator

Managing the report:

Consider the options to manage the report, including manage internally, early help, referral to children's social care and report to police

Concord Summer School's DSL records incidents of child-on-child abuse to monitor if there are any patterns.

It is vital that staff at Concord Summer School understand that the child who is perpetrating the abuse may also be at risk of harm. Staff should make every effort to ensure that the child who is perpetrating the abuse is also treated as a potential victim and undertake assessments to conclude this. Sensitive work must be undertaken with the child who is perpetrating, by helping them to understand the nature of their behaviour and the effect it has on others may prevent abuse.

Staff must be able to use their professional judgement in identifying when what may be perceived as "normal developmental childhood behaviour" becomes abusive, dangerous and harmful to others. The DSL may need to consult with the SSCP Threshold document to help with their decision making.

The Brook Traffic Light System will support identifying developmentally typical behaviours or those that may be referred to as problematic or harmful.

Children do not always feel able to speak out about their experiences of child-on-child sexual abuse. They may be afraid of:

- Being considered a 'snitch'
- Getting in trouble themselves
- How they will be perceived by others
- Teachers or other adults not being discrete
- Their parents being informed

A helpline was launched by the NSPCC on 1st April 2021 to support potential victims of sexual harassment and abuse. It aims to provide advice and support to both children and adults who are victims of abuse in school. It will also include how to contact the police to report crimes. The advice line is also available to support professionals and parents. **NSPCC helpline number is 0800 136 663.**

This dedicated helpline will offer support to:

- All children and young people making current and non-recent disclosures of abuse
 - Any children or young people who want to talk about being involved or witnessing any incidents
 - Any adults who have experienced non-recent abuse
 - Parents and carers who have any concerns about their own or other children
 - Professionals who work in schools and need support in this or related issues
- Concord Summer School promotes the use of the helpline via the display of posters around the campus.

Cyberbullying

Fresh challenges are presented by young people's use, misuse, or abuse of new technologies. Cyberbullying can be unintentional - as with other forms of bullying. However, the perpetrator can share electronic bullying materials and thus the bullying can be aggravated by the involvement of bystanders or "accessories".

Cyberbullying is a particularly pernicious form of bullying because it can be so pervasive and anonymous. There can be no safe haven for the victim who can be targeted at any time or place. The College's Anti-bullying policy (Staff Handbook) describes the preventative measures and the procedures that will be followed when the College discovers cases of bullying/ cyberbullying.

Students who experience cyberbullying are encouraged to store examples of abusive messages or images for use as evidence against the perpetrators. In addition, students should be aware of the means of stopping or limiting the spread of bullying material (e.g. blocking, contacting network managers/internet service providers and/or police).

Concord Summer School values all of its pupils equally. It is part of the College's ethos to promote considerate behaviour and to value diversity. Concord students are expected to maintain the same good manners online as in their face-to-face dealings in the real world. It is recognised that young people can be both victims and perpetrators of online abuse.

Bullying (including cyberbullying) and harassment in any form should always be reported to a member of staff. It is never the victim's fault, and he or she should not be afraid to come forward.

The creation and sending of nude or semi-nude images

The creation and sending of nude or semi-nude images (formally referred to as 'sexting') is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference.

However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, young people are not even aware that they could be breaking the law as stated as these are offences under the Sexual Offences Act 2003.

When dealing with incidents, staff should inform the DSL, or a member of the safeguarding team, as well as consulting with the UKCIS guidance document, on ['Sharing Nude and Semi-Nude Images'](#).

Initiation/Hazing

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies.

The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

Prejudiced Behaviour

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, race / ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to

issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual), pregnancy / maternity.

Sexual violence and sexual harassment between children

Sexual violence and sexual harassment (or 'unwanted conduct of a sexual nature') can occur between two children of any age and sex. It can occur through a group of children. Sexual violence and sexual harassment exist on a continuum and the two may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. All Concord Summer School staff are advised to be vigilant and maintain the attitude of 'it could happen here'. Addressing inappropriate behaviour early and adopting a zero-tolerance approach can be an important intervention in preventing more problematic, abusive, or even violent behaviour in the future. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner. All reports by victims will be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment. It is recognised that sexual violence and harassment can happen anywhere – inside or outside of Concord Summer School, or online

It is vital that staff at Concord College understand that the child who is perpetrating the abuse may also be risk of harm. Staff should make every effort to ensure that the perpetrator is also treated as a victim and undertake assessments to conclude this. Sensitive work must be undertaken with the child who is perpetrating, by helping them to understand the nature of their behaviour and the effect it has on others may prevent abuse as a whole.

Staff must be able to use their professional judgement in identifying when what may be perceived as "normal developmental childhood behaviour" becomes HSB (or Harmful Sexual Behaviour) or even CSE (or Child Sexual Exploitation). Other factors for staff to consider are: informed consent; any imbalance of power; possible coercion. Staff may need to consult with Concord Summer School's DSL as well as consulting Part 5 of KCSIE 2022, "Child on child sexual violence & sexual harassment" as well as the SSCB Threshold document to help with their decision making. Four scenarios are likely: manage internally; refer for early help; refer to children's social care; report to the Police. Similarly, four outcome decisions are possible: unsubstantiated, unfounded, false or malicious.

Safeguarding children with special educational needs and disabilities

It is recognised that children with special educational needs or disabilities (SEND) can present additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include: assumptions that indicators of possible abuse such as behaviour, mood and injury, relate to the child's impairment without further exploration; children with SEND can be disproportionately impacted by issues such as bullying, without necessarily showing outward signs; communication barriers. It is important, therefore, to be particularly sensitive to these issues when considering any aspect of the welfare and safety of such children, and to seek professional advice where necessary.

Ant reports of abuse involving children with SEND will therefore require close liaison between the Summer School's DSL and the Director of Studies. Extra pastoral support measures will be considered with children with SEND.

Children Missing Education

All children, regardless of their circumstances, are entitled to a full time education, which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their

area. Effective information sharing between parents, schools, colleges and local authorities is critical to ensuring that all children are safe and receiving suitable education.

A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. School and college staff should follow their procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

Schools and colleges should put in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, female genital mutilation and forced marriage. Further information about children at risk of missing education can be found in the [Children Missing Education information \(Shropshire Council\)](#).

There are many reasons why we want young children to have regular attendance at our setting. As well as supporting their learning and development, we want to try to make sure that children are kept safe, their wellbeing is promoted and they do not miss out on their entitlements and opportunities. In a small minority of cases, good attendance practice may also lead to the earlier identification of more serious concerns for a child or family and may have a vital part to play in keeping a child or other family members safe from harm.

In our setting, we have procedures for recording and following up any unexplained non-attendance and know how to respond to different problems and where to access advice, support or whom to alert if concerns arise.

For further information, Concord staff should refer to the Summer School Director and DSL.

Injuries

At the beginning of each session or school day parents are requested to notify us of any accidents, incidents or injuries which may affect their child before leaving him/her at the school. A note will be made of any existing injuries and how the injury was received will be recorded. A body map may be used to indicate any marks/bruises (**See Appendix C**)

Injuries to students who are involved in an accident at school or on an activity organised by the school are only reportable to the Health and Safety Executive under RIDDOR if the accident results in:

- the death of the student, and arose out of or in connection with a work activity;
- or an injury that arose out of or in connection with a work activity and the student is taken directly from the scene of the accident to hospital for treatment (examinations and diagnostic tests do not constitute treatment).

For further information refer to HSE Information Sheet 'Incident reporting in schools (accidents, diseases and dangerous occurrences).

Safe use of ICT and mobile phones – Online safety (or e-safety)

The use of mobile phones and other electronic devices such as computers, tablets, and game devices is commonplace. However, as a society, we are beginning to recognise that although these devices have brought great benefit we also need to ensure that we help children to understand there are dangers and how to keep themselves safe. This includes:

- Keeping personal details secure
- Understanding that not all content is appropriate, truthful or legal

- What to do if they do accidentally access inappropriate or illegal content
- What to do if they are upset by something they receive
- What to do if they are going to meet someone they have met on-line in the real world

It is essential that children are safeguarded from potentially harmful and inappropriate material online. The Concord Summer School's network filtering and reporting systems help protect children to an extent. However, many children have unlimited and unrestricted access to the internet via mobile 'phone networks. Students are bound by the E-Safety Policy and staff by the Acceptable Use Policy. Four areas of risk are recognised: content, contact, conduct, and commerce.

Appropriate use of mobile phones is essential by all members of the staff and student community Concord Summer School. Staff accompanying students on trips off campus should make use of College mobile 'phones instead of their personal mobile 'phones since the latter should not be shared with students. Any student mobile numbers which are on College mobile 'phones should be deleted after use.

College staff are able to use their personal mobile phones during their break times. All staff are made aware of their duty to follow the Acceptable Use Policy (AUP) (found in the Appendices to Contract) procedure with regard to computers and other portable devices, and to challenge anyone not adhering to it. Staff are required to read and confirm their compliance with the policy each academic year.

Visitors to the College should be monitored in terms of their mobile 'phone use by accompanying staff who should keep in mind the potential for inappropriate use – especially in terms of the capturing and consequent sharing of images.

We believe that photographs validate children's experiences and achievements and are a valuable way of recording milestones in a child's life. Parental permission for the different ways in which we use photographs is gained as part of the initial registration process in completing the parent contract with Concord Summer School. We take a mixture of photos that reflect the College environment, sometimes this will be when children are engrossed in an activity either on their own or with their peers. In order to safeguard children and adults and to maintain privacy, cameras are not to be used during intimate care situations by adults or children.

Through induction, staff and volunteers are made aware of our 'acceptable use of technology' policy both at home and in the workplace. If any staff or volunteers breach this policy then we will take disciplinary action which may result in a referral to the Disclosure and Barring Service.

Students are allowed to use and own their own mobile phones, tablets, computers whilst in the care of the College. However, they must comply with the provisions of both the Student Computer & Network Access policy and the separate Mobile Telephones Policy contained in the student code of conduct. Students are required to read and confirm their understanding and compliance with both policies. College staff have a duty to monitor and help students understand the importance of keeping themselves safe on line and when using their portable devices.

Taking action

It is vital that as staff working with children in our Summer School that you will build trusted relationships with them. This means listening to and supporting them in a way which meets their needs in your everyday work. This will help our children to feel reassured, safe and able to communicate with you more easily.

Key points to remember for taking action are:

- In an emergency take the action necessary to help the child. For example, call 999. Consider moving the child to a safe place.

- Report your concern to the DSL immediately.
- If the DSL is not able to be contacted, then you should ensure action is taken to report the concern to a member of the Safeguarding Team.
- Do not start your own investigation.
- Be mindful that early information sharing is vital for the effective identification, assessment and provision of appropriate help when problems first emerge, or where a child is already known to be a risk.
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family. Information should be shared with the right people between and within the right agencies.
- Complete a record of concern & pass a copy to the Safeguarding Manager as soon as possible. (- **See Appendix F**)
- Seek support for yourself if you are distressed.
- Consider contacting the **NSPCC Helpline** to discuss any concerns about a child. **Tel. no. 0808 800 5000**

If you suspect a child is at risk of harm

There will be occasions when you suspect that a child may be at serious risk, but you have no 'real' evidence. The child's behaviour may have changed, their artwork could be bizarre or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

Children may not feel ready or know how to tell you that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could also be due to their vulnerability, experiences, individual characteristics or needs. In these circumstances, use your professional curiosity and the trusted relationship you have with them to try to give the child the opportunity to talk.

Report your concerns to the DSL and safeguarding team by email to SummerDSL@concordcollege.org.uk. This email will alert relevant staff without breaching confidentiality. Information sharing will occur with staff on a need to know basis and will include key staff members including the Boarding Manager, Director of Studies and Lead Boarding Parent.

If the child does begin to reveal that they are being harmed you should follow the advice in the section 'If a child discloses to you'.

If, following your conversation, you remain concerned, you should discuss your concerns with the DSL.

If a child tells you (or discloses) that they have been abused:

Make sure you are aware of the [Shropshire Children Reporting Concern guidance](#)

It takes a lot of courage for a child to disclose that they are being neglected and or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a child talks to you about any risks to their safety or wellbeing you must not promise confidentiality. You will need to let them know that **you must** pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement. If you jump in immediately the child may think that you do not want to listen, if you leave it till the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise. Telling a child you must pass information on may mean that the child is worried about it or chooses not to talk to you. Keep in mind and recognise how difficult telling you is likely to be. Offer them reassurance and explanations that you want to help them to be safe (making sure you do not make any promises about what will happen) Be honest and say if you do not know.

All staff should be able to reassure children who tell them about abuse that they are being taken seriously and that they will be supported and kept safe. A child should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a child ever be made to feel ashamed for making a report or choosing not to talk to staff.

During your conversation with the child:

- Allow them to speak freely.
- Remain calm and do not over react – the child may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
- Do not be afraid of silences – remember how hard this must be for the child.
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the child’s mother think about all this.
- At an appropriate time tell the child that in order to help them you must pass the information on.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Avoid admonishing the child for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be your way of being supportive but the child may interpret it that they have done something wrong.
- Tell the child what will happen next. The child may agree to go with you to see the designated person. Otherwise let them know that someone will come to see them before the end of the day.
- Report verbally to the designated person.
- Write up your conversation as soon as possible on the record of concern form and hand it to the designated person.
- Seek support if you feel distressed.

Refer to **Appendix E** for record of concern.

Managing allegations of abuse made against, or concerns raised in relation to staff (this includes apprentices), students or volunteers (see Appendix H)

As part of our whole school approach to safeguarding, Concord Summer School will ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of Concord Summer School (including support teachers, volunteers and contractors) are dealt with promptly and appropriately.

There are two levels of allegation/concern:

1. Allegation that **may** meet the harms threshold
2. Allegation/concerns that **do not** meet the harms threshold – which may be referred to as ‘low level concerns’.

Allegations which might indicate that a person would pose a risk of harm to children if they continue to work in regular or close contact with children in their present position will be taken seriously. We have a duty to inform ISI of any serious allegations made against a person. Which suggests he or she has:

- behaved in a way that has harmed a child, or may have harmed a child &/or;
- possibly committed a criminal offence against or related to a child; &/or;
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children&/or

- behaved or may have behaved in a way that indicates that they may not be suitable to work with children – including behaviour that may have happened outside of Summer School (also known as transferable risk).

Allegations that meet the harm threshold:

We also have a duty of care towards our staff. We provide support for anyone facing an allegation and provide employees with a named contact if they are suspended. It is essential that any allegations of abuse made against members of staff or volunteers are dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

Members of staff likely to receive allegations against members of staff are: the Principal, the Chairman of the Board of Trustees, The Summer Course Director or the DSL. They must contact the LADO immediately.

The DO (or Designated Officer) or LADO	Ellie Jones and/or Michelle Taylor	Via the First Point of Contact Team (or FPOC) on 0345 678 9021 or via her e-mail address: Ellie.Jones@shropshire.gov.uk Michelle.taylor@shropshire.gov.uk and/or lado@shropshire.gov.uk
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If there are concerns about any staff member, including the DSL or safeguarding team members, then these should be referred to the Summer Course Director.

Summer School Director	Julie Kaul	Internal 'phone numbers: Office = 160 or 135
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Where there are concerns about the Summer Course Director, these should be referred to the Chair of the Trustees who can be contacted as follows:

The Chairman of the Board of Trustees	Dr Iain Bride	Via his e-mail address: imbride@concordcollege.org.uk
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In cases where allegations are made against supply agency staff, the agency will be fully informed by the College.

As Concord College is a member of the BSA (or Boarding School's Association), it is required to inform the BSA, as soon as it is possible and permissible to do so, of any allegation against a main term member of staff which the school has referred to the LADO, Police or Children's Services. Under the BSA's Commitment to Care Charter (v.2 published September 2017), the BSA will be informed that an incident has occurred and which statutory agencies re involved. Contact are as follows:

Dale Wilkins, Head of Safeguarding and Standards at the BSA: dale@boarding.org.uk (tel. no. 07905 127 650) or email safeguarding@boarding.org.uk

The LADO may ask for additional information, such as previous history, whether the child or their family have made similar allegations previously and the individual's current contact with children. There may be situations when the LADO will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it will be recorded by both the DSL/ College Principal and the LADO, and agreement reached on what information should

be put in writing to the individuals concerned and by whom. The DSL/ Principal will then consider with the LADO what action should follow both in respect of the individual and those who made the initial allegation.

If further action is required we will follow the advice of the LADO and co-operate with any investigations. We will follow instructions about what can be disclosed to the accused and whether he/she should be suspended whilst further investigations take place. This is not an indication of admission that the alleged incident has taken place, but is to protect the staff as well as children and families throughout the process. Clear advice will be given to workers on the process of investigation by other agencies. We will follow advice about how to inform families about the allegation.

In order for the College to meet its statutory obligations in dealing with Child Protection issues in cases of serious allegations against teachers and/or head teachers, referrals/ reports will be sent to the following:

- the DBS (or Disclosure & Barring Service) – in cases where the school dispenses with a person's services because of unsuitability to work with children, or would have done so had the person not resigned.
- the TRA (Teaching Regulation Agency) – in cases where a teacher has been dismissed (or would have been dismissed had he or she not resigned) and a prohibition order may be appropriate, because of "unacceptable professional conduct", "conduct that may bring the profession into disrepute", or a "conviction at any time for a relevant offence".

If we are aware of the details of a child who has or may have been harmed by a member of staff or volunteer will contact Compass to make a referral to seek support for the child.

There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. [Safeguarding Vulnerable Groups Act 2006](#)

Concerns that do not meet the harm threshold:

As part of a whole College approach to safeguarding, Concord recognises the importance of creating and maintaining an open and transparent culture in which **all** concerns about adults working in, or on behalf of, the College are dealt with promptly and correctly. Concord seeks to: identify and address concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the College are clear about professional boundaries as set out in our Staff Code of Conduct and act within these boundaries in accordance with our ethos and values. Staff should feel empowered to raise any low level, but not insignificant, concern about their own, or a colleague's behaviour, if it is felt to fall below the high standards expected.

A concern about staff behaviour could be defined as behaviour which causes a sense of unease or a "nagging doubt" that an adult has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the serious harm threshold for allegations requiring referral to the DO or LADO. Examples of such behaviour could include a wide spectrum, including inadvertent or thoughtless acts or words, but are not limited to:

- being over-friendly with children;
- having favourites;
- taking photographs of children on their mobile 'phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- humiliating pupils. (KCSIE Sept 2022)

Low level concerns about a member of staff should be shared with the College's Safeguarding Manager or a member of the safeguarding team. Where a low-level concern is raised about the Safeguarding Manager, the Summer School Director should be informed. They will gather evidence in the case of a third party report by

speaking to the individual raising the concern as well as with any other individuals or witnesses involved. This information will then help to categorise the concerning behaviour and what further action needs to be taken. Support will be offered to individuals to correct unprofessional behaviour at an early stage in a sensitive and proportionate manner.

Confidential records of low level concerns will be kept and will include: details of the concern; the context in which the concern arose; action taken; the name of the individual raising the concern (but respecting requests for anonymity as far as reasonably possible). Low level concerns will not be included in references except in cases when a concern (or group of concerns) has met the harm threshold for referral to the LADO (as per allegations above) and found to be substantiated. Low level concerns will be taken into account in decisions regarding employment in future Summer Schools.

Whistleblowing

Whistle blowing is a mechanism by which adults can voice their concerns in good faith, without fear of repercussion. Any behaviour by colleagues that raises concern regardless of source will be recorded and reported to the designated practitioner or appropriate agency. However, anyone has the option of directly contacting external agencies themselves and “blowing the whistle” but, where possible, a conversation should normally take place with the DSL first. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Social Services via the contact ‘phone numbers show in the table below. Anybody can make such a referral directly to children’s social care. The DSL should normally be informed as soon as possible after a referral is made.

(Further information can be found in the Whistle Blowing Policy in the Appendices to Contract)

Social Services (-see point 6.i. below)	The First Point of Contact Team (or FPOC)	External tel. no. 0345 678 9021 (weekdays)
	Emergency Social Work Duty Team (after office hours & at weekends)	External tel. no. 08456 789040 (after office hours & at weekends)

Recruiting Staff

We provide appropriate staffing resources to meet the needs of children.

Job adverts and application packs make reference to our safeguarding policy and procedures.

Applicants for posts are clearly informed that positions are exempt from the Rehabilitation of Offenders Act 1974. We ensure that we meet our responsibilities under the Safeguarding Vulnerable Groups Act 2006.

Where applicants are rejected because of information that has been disclosed, we will inform the applicant about their right to know and to challenge incorrect information.

We comply with the Safeguarding and Welfare Requirements in Keeping Children Safe In Education 2021 in respect of references and Enhanced Disclosure and Barring Service checks for staff, trustees and volunteers to ensure that no disqualified or unsuitable person works with or has access to the children. This includes disqualification by association, where a registered provider or a childcare worker may also be disqualified because they live in the same household as another person who is disqualified, or because they live in the same household where a disqualified person is employed.

We have procedures for recording the details of visitors, including prospective candidates, to the setting and ensure that we have control over who comes in to the premises so that no unauthorised person has unsupervised access to the children.

Staff Supervision (including students and volunteers)

In order to ensure that all staff are alert to any issues for concern, staff receive regular training and updates in safeguarding and child protection through a range of training and supervision activities. This includes both formal and informal supervision, professional reviews, staff meetings and access to SSP approved training. Individual supervision offers staff an opportunity to improve their practice with children and address any issues resulting in poor performance. Individual supervision also provides a safe space in which to raise any concerns they may have about the conduct of other adults connected with the setting. (For more information, see the "[Staff Code of Conduct Policy](#)" in the Appendices to Contract.)

Staff supervision is also used to ensure that all staff remain suitable to work with children. This means staff are required to inform their manager of any medication they are taking and provide medical evidence that this will not impair their ability to look after children properly. Staff are also required to disclose any information, which may lead to their disqualification.

Updating this document

All staff should discuss promptly with the Designated Safeguarding Lead any concerns about this policy, its effective implementation, poor/unsafe practice & potential failures in Concord Summer School's safeguarding regime. This policy and procedure is a "living document" which responds to and reflects the changing welfare needs of students.

The Safeguarding & Child Protection Policy & Procedure will also be reviewed when legislation changes and/or after any safeguarding incident occurs.

Author: Jeremy Kerslake	Date Policy adopted: August 2017. Updated 03/10/17 with BSA contacts. Reviewed & updated 07/05/18 to include points from the Charity Commission's checklist. Updated again on 15/06/18 to include Barnardo's guidance from training received. Updated & reviewed 15/08/18, 28/08/18, 26/02/19, 29/08/19 & again on 27/02/19.
Position: Vice-Principal (Pastoral) & DSL	Review Date: Ongoing
Reviewed by the Welfare Committee of the Board of Trustees	Nov 2017 & 07/12/18
Reviewed for Summer School purposes: Kari Quant	Reviewed: Jun 2019
Reviewed and updated for Summer School purposes: Kathryn Weaver	Reviewed: Jun 2022, Jun 2023

Appendix A – The Role of the Designated Safeguarding Lead & Deputy DSL

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead.

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

This person should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively.

Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and interagency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.

Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description.

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

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns.

Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Manage referrals

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

Working with others

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff;
- act as a point of contact with the safeguarding partners;
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;
- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes:
 - ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
 - support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Keeping Children Safe in Education 2021 Part one and Part two of the guidance.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required. Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising Awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff;

- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents know referrals about suspected abuse or neglect may be made and the role of the school or college in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies, procedures and guidance and required audit processes from the Shropshire Safeguarding Community Partnership (SSCP)
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

Training, knowledge and skills

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

The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

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

- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and,
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of Keeping Children Safe in Education 2021 guidance, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping

Appendix B Pupil's Chronology

Name of pupil:.....

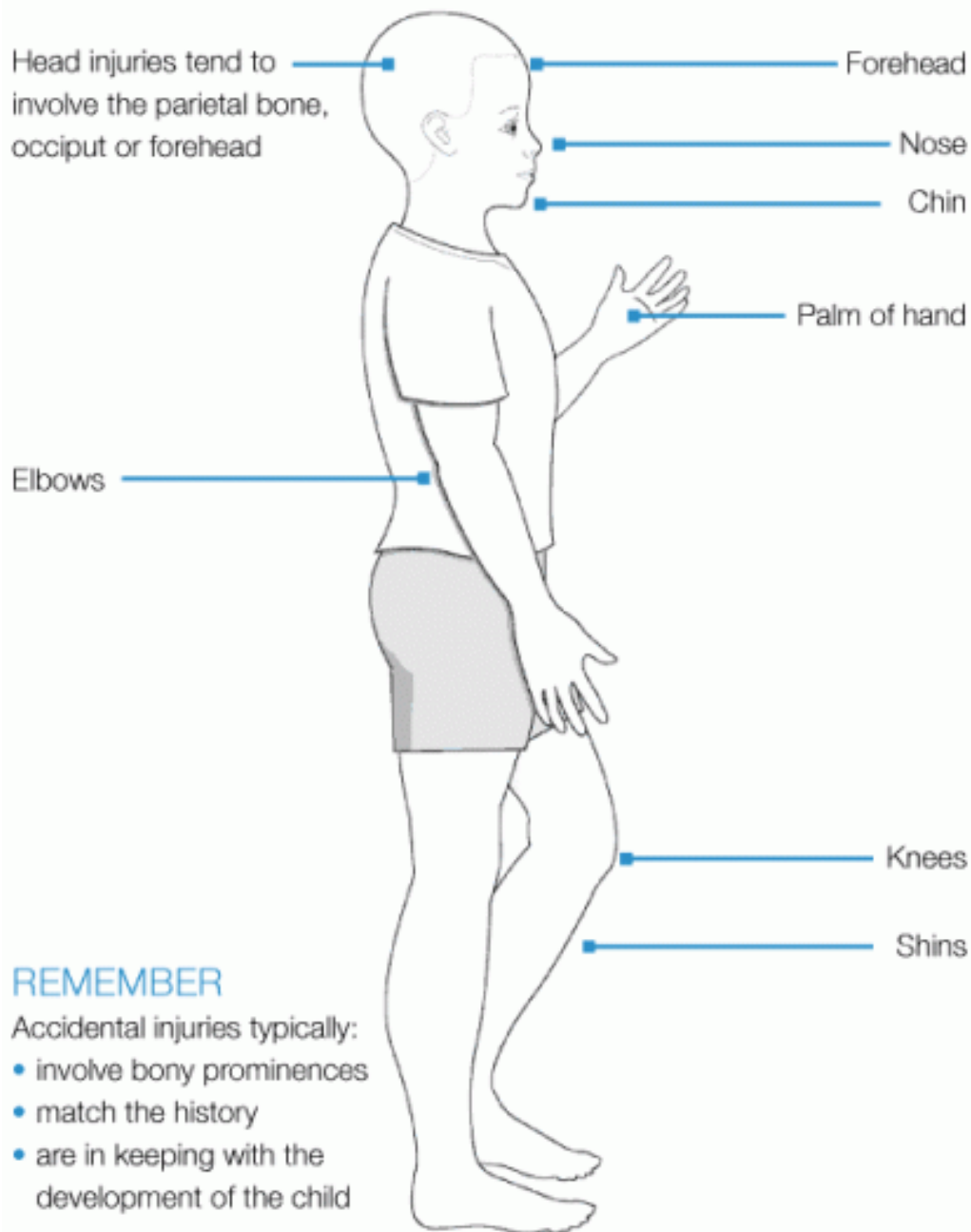
D.O.B......

Brief summary of events prior to chronology:

[illegible]

Appendix C – Body Maps

Body map 1



REMEMBER

Accidental injuries typically:

- involve bony prominences
- match the history
- are in keeping with the development of the child

Body Map 2

Ears – especially pinch marks involving both sides of the ear

The “triangle of safety” (ears, side of face, and neck, top of shoulders): accidental injuries in this area are unusual

Inner aspects of arms

Back and side of trunk, except directly over the bony spine

Black eyes, especially if bilateral

Soft tissues of cheeks

Intra-oral injuries

Forearms when raised to protect self

Chest and abdomen

Any groin or genital injury

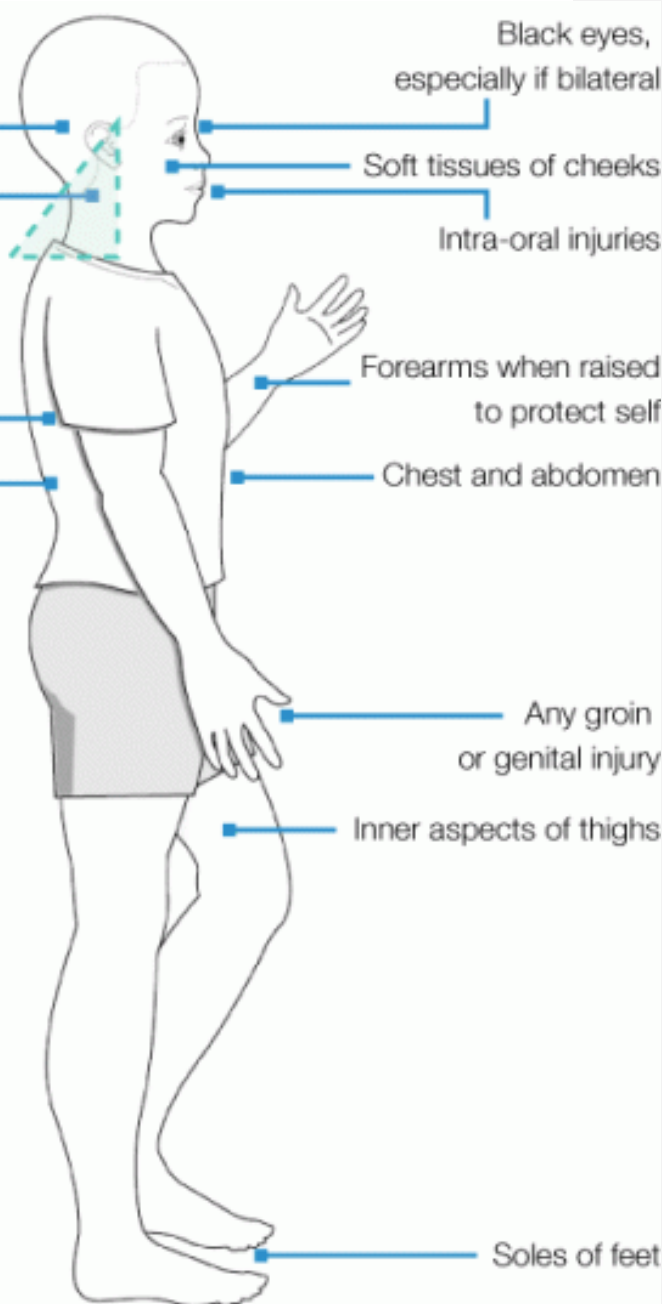
Inner aspects of thighs

Soles of feet

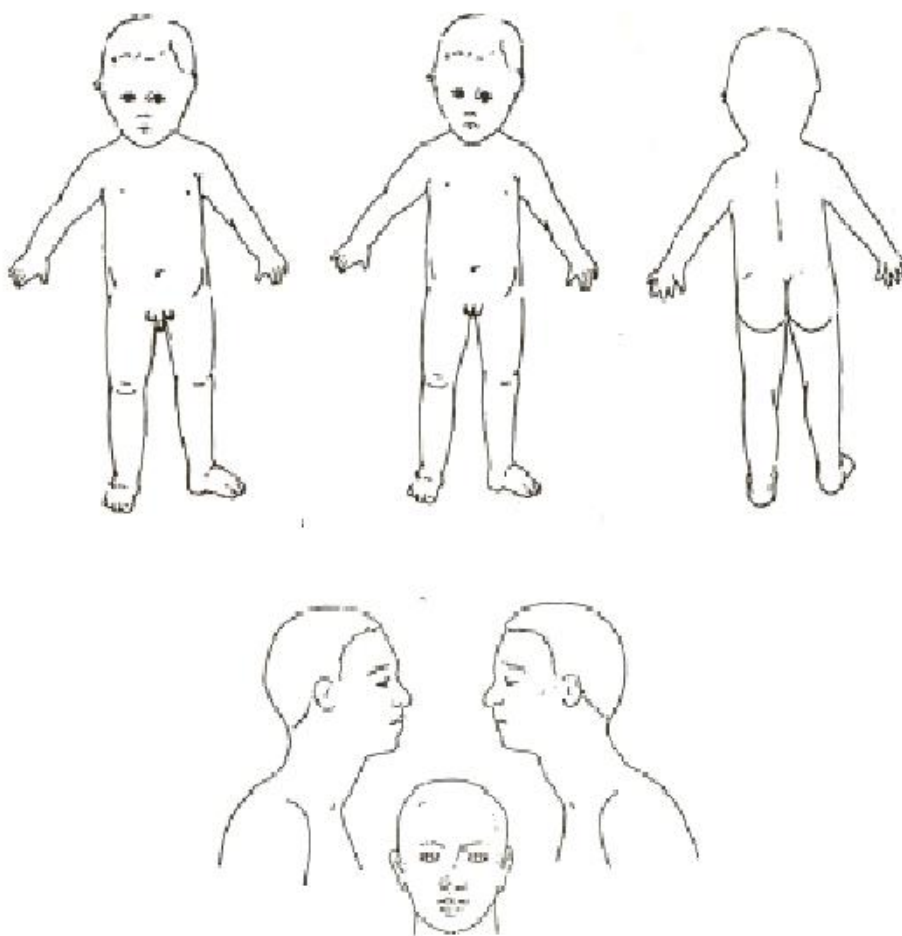
REMEMBER

Concerns are raised by:

- injuries to both sides of the body
- injuries to soft tissue
- injuries with particular patterns
- any injury that doesn't fit the explanation
- delays in presentation
- untreated injuries



Body Map 3



Appendix D– Serious accidents, injuries and deaths – what you must notify to Ofsted:

- the death of a child while on the premises, or later, as the result of something that happened while the child was in your care
- death or serious accident or serious injury to any other person on your premises (Childcare Register only)
- serious injuries (please see the section below for the definition of serious injuries)
- where a child in your care is taken to hospital (to an Accident and Emergency Department for more than 24 hours), either directly from your provision, or later, as the result of something that happened while the child was in your care
- any significant event which is likely to affect the suitability to care for children.

Serious injuries are defined as:

- broken bones or a fracture
- loss of consciousness
- pain that is not relieved by simple pain killers
- acute confused state
- persistent, severe chest pain or breathing difficulties
- amputation
- dislocation of any major joint including the shoulder, hip, knee, elbow or spine
- loss of sight (temporary or permanent)
- chemical or hot metal burn to the eye or any penetrating injury to the eye
- injury resulting from an electric shock or electrical burn leading to
- unconsciousness, or requiring resuscitation or admittance to hospital for more than 24 hours
- any other injury leading to hypothermia, heat-induced illness or
- unconsciousness; or requiring resuscitation; or requiring admittance to
- hospital for more than 24 hours
- unconsciousness caused by asphyxia or exposure to harmful substance or
- biological agent
- medical treatment, or loss of consciousness arising from absorption of any
- substance by inhalation, ingestion or through the skin
- medical treatment where there is reason to believe that this resulted from
- exposure to a biological agent, or its toxins, or infected material.

You are not required to inform Ofsted of minor injuries, but you must keep a record of these incidents. You are also not required to inform Ofsted of general appointments to hospital or routine treatment by a doctor, such as the child's general practitioner, that is not linked to, or is a consequence of, a serious accident or injury.

Minor injuries are defined as:

- sprains, strains and bruising
- minor cuts and grazes
- wound infections
- minor burns and scalds
- minor head injuries
- insect and animal bites
- minor eye injuries
- minor injuries to the back, shoulder and chest

Appendix E– Sample form for recording and reporting concerns about a child

Details of child and parents/carers

Name of child:		
Gender:	Age:	Date of birth:
Ethnicity:	Language:	Additional needs:
Name(s) of parent(s)/carer(s)		
Child's home address and address(es) of parents (if different from child's)		

Your details

Your name:	Your position:	Date and time of incident (if applicable):
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Are you reporting your own concerns or responding to concerns raised by someone else? (delete as appropriate)

- Reporting own concerns
- Responding to concerns raised by someone else

If you are responding to concerns raised by someone else, please provide their name and position within the organisation:

Please provide details of the incident or concerns you have, including times, dates, description of any injuries, whether information in first hand or the account of others, including any other relevant details:

The child's account/ perspective:

Please provide details of anyone alleged to have caused the incident or to be the source of any concerns:

Provide details of anyone who witnessed the incident or who shares the concerns:

Please note: concerns should be discussed with the family **unless**:

- The view is that a family member might be responsible for abusing the child
- Someone may be put in danger by the parents being informed
- Informing the family might interfere with a criminal investigation.

If any of these circumstances apply, consult with the local authority children's social care department to decide whether or not discussions with the family should take place.

Have you spoken to the child's parents/carers? If so, please provide details of what was said. If not, please state the reason for this:

Are you aware of any previous incidents or concerns relating to this child and of any current risk management plan/ support plan? If so, please give details:

Summary of discussion with supervisor/ manager:
<p>Has the situation been discussed with the named person for child protection?</p> <p>Yes/ No (delete as appropriate)</p> <p>If so, please summarise the discussion:</p>
<p>Have you informed the statutory child protection authorities?</p> <p>Police: Yes/No (delete as appropriate) Date and time: Name and phone number of the person you spoke you spoke to:</p> <p>Local authority children's social care: Yes/No (delete as appropriate) Date and time: Name and phone number of the person you spoke you spoke to:</p> <p>Action agreed with child protection authorities:</p>
What has happened since referring to statutory agency(ies)? Include the date and nature of feedback from referral, outcome and relevant dates:
If the concerns are not about child protection, details of any further steps taken to provide support to child and family and any other agencies involved:

Name.....	Position.....
Date.....	Signed.....
Managers name.....	Position.....
Date.....	Signed.....

Appendix F – The Local Authority Designated Officer (LADO)

Duty to refer

In addition to informing Ofsted, the Designated Lead for Safeguarding or senior manager has a duty to refer any concerns to the LADO where it is alleged that a person who works* with children has:

- Behaved in a way that has harmed a child, or may have harmed a child - whether the alleged abuse occurred on or off the premises where the childcare takes place;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates he/she is unsuitable to work with children such as excessive one-to-one attention beyond the requirements of their usual role; or
- Displayed inappropriate behaviour such as inappropriate sexual comments, inappropriate sharing of images, or displays violent or aggressive behaviour.

Responsibility would also include reporting applications to work or volunteer with children and young people from adults who are barred from doing so as this poses a potential risk of significant harm to children and young people.

The LADO should be informed of ALL allegations that come to a Senior Manager's attention within 1 working day of the manager becoming aware of the allegation.

In cases where the nature of the allegation has not required immediate referral to the Compass or the Police, the Senior Manager and the LADO will make a decision jointly as to whether such a referral is necessary and who will make it.

The LADO should also be informed of any allegations that are made directly to the police or Compass.

It is important that even apparently less serious allegations are seen to be followed up objectively by someone independent of the organisation concerned. This is why the LADO should be informed of ALL allegations that come to the employers' attention.

The role of the Local Authority Designated Officer

The LADO will advise the employer of any action that may be necessary, whether an investigation will take place, and if so what form the investigation will take.

It is their role to provide on-going advice and liaison and to monitor the progress of cases. This may include:

- Advising the employer on next steps, such as the need to inform the child's parents; advice on dismissal or suspension of the member of staff accused; the decision as to whether or not the case will be investigated and by whom.

- Regularly monitoring the progress of cases to ensure that they are dealt with as quickly as possible consistent with a fair and thorough process.
- Liaising with the employer to provide advice and support when required/requested.
- Oversight and management of individual cases.

If an allegation is substantiated and the employer dismisses the person or ceases to use that person's services, the employer should consult with the LADO about whether a referral to the Disclosure and Barring Service is required.

Referral to the LADO should form part of your disciplinary and whistleblowing procedures.

The role of the setting's Designated Lead for Safeguarding

The Designated Lead for Safeguarding or the senior manager making the referral will be expected to play a key role in the investigative process and follow the advice given by the LADO. This may involve:

- Gathering any additional information which may have a bearing on the allegation, for instance: previous concerns, care and control incidents and so on;
- Providing the subject of the allegation with information and advising them to inform their union or professional body;
- Attending Strategy Meetings where required;
- Liaising with the LADO;
- Ensuring that risk assessments are undertaken where and when required;
- Ensuring that effective reporting and recording systems are in place which allow for the tracking of allegations through to the final outcome;
- Should the allegation be unfounded, giving consideration to a referral either to Compass or the police if the allegation is deemed to be deliberately malicious or invented.

Record keeping

It is important that employers keep a clear and comprehensive summary of any allegations made, details of how the allegation was followed up and resolved. This record should be placed on the person's confidential personnel file with a copy given to the individual.

The record should be kept at least until the person reaches retirement or for ten years if that would be longer.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference.

Details of allegations that are found to be malicious should be removed from personnel records.

Further information

SSCB Inter Agency Child Protection Procedures - chapter 4.1 Managing Allegations Against Adults Working with Children & Young People:
http://westmerciaconsortium.proceduresonline.com/chapters/p_all_against_adults.html

*The term 'works with children' refers to any individual employed to work with children or acting in a voluntary capacity.

Appendix H – Roles and Safeguarding Responsibilities in Education Setting

(please note these lists are not exhaustive)

The Board of Trustees

On 5 January 2015 the Education (Independent School Standards) Regulations 2014 (ISSR) came into force. Part eight sets out a new standard for the quality of leadership and management in all independent schools. The explanatory note accompanying the new ISSR makes it clear that the proprietor or governing body can now be held accountable for ensuring those members of staff with leadership and management responsibilities are able to:

- demonstrate good skills and knowledge
- fulfil their responsibilities effectively
- actively promote pupil wellbeing.
- Part three of the ISSR at paragraph 7 contains a regulatory requirement for the proprietor (or governing body) to ensure:
- that arrangements are made to safeguard and promote the welfare of pupils at the school
- such arrangements have regard to any guidance issued by the Secretary of State.

The current key guidance issued by the Secretary of State is statutory guidance 'Keeping Children Safe In Education 2018' (KCSIE). The summary section at the beginning of KCSIE requires it to be read alongside further statutory guidance 'Working Together To Safeguard Children 2018' (WTTSC) and the DfE advice 'What To Do If You Are Worried A Child Is Being Abused 2015'. It is important to note that statutory guidance must be properly followed except where deviation can be justified.

Part two of KCSIE sets out the collective responsibilities of proprietors and governing bodies for the management of safeguarding. In summary, these responsibilities include those listed below:

- Ensure that the school designates an appropriate senior member of staff to take lead responsibility for child protection. This person should have the status and authority within the school to carry out the duties of the post, including committing resources and, where appropriate, supporting and directing other staff;
- Ensure sufficient funding, time, supervision and support are given to the Designated Safeguarding Lead in order for them to carry out their responsibilities effectively; this includes the appointment of a Deputy DSL. In

larger school more than one deputy might be required, in which case there are considerable benefits in identifying a safeguarding team within school.

- Nominate a senior Trustee to take responsibility for safeguarding arrangements within the school.
- Ensure the DST liaises with the local authority and/or partner agencies in the event of allegations of abuse being made against a headteacher, principal, proprietor or member of the governing body of an independent school;
- Ensure that there is an effective Safeguarding Policy in place together with a Staff Behaviour Policy (Code of Conduct) and Managing Allegations against staff policy. These should be provided to all staff;
- Ensure that all school policies and procedures make reference where relevant, to the safeguarding policy, for example Recruitment and Selection, Behaviour Policy, Missing,
- Be responsible for undertaking annual reviews of the procedures that apply to child protection and judging the efficiency with which the related duties have been discharged;
- Ensure that appropriate IT filters and monitoring devices are in place to safeguard students online
- Receive regular updates from the DSL. These should be anonymised
- Consider how children may be taught about safeguarding through teaching and learning opportunities, as part of providing a broad and balanced curriculum;
- Assess the safeguarding risks that might arise from the school's activities and operations;
- preventing people who pose a risk of harm from working with children
- Ensuring that effective processes and systems are in place to allow the voice of the child to be heard.
- Ensure there is a culture in school which supports both children and adults

The Safeguarding Role of Principals, Vice Principals and Summer Course Director

The Principal and Vice Principal have the leadership responsibility to ensure that the school complies with safeguarding duties under legislation and in line with best practice. They must ensure that the school's safeguarding arrangements are effective and regularly reviewed and updated.

The Principal, Vice Principal and Summer Course Director must ensure that:

- The school has effective safeguarding policies and procedures in place, which are fully implemented and followed by all staff.
- These policies also include those relating to behaviour in school including bullying, health and safety, harassment, and discrimination.
- There is a designated safeguarding lead appointed who co-ordinates the school's safeguarding and child protection arrangements by providing advice and support to other staff on child welfare and child protection matters, takes part in strategy meetings, contributes to multiagency assessments and inter-agency meetings and support other staff to do so. There must also be a deputy or deputies DSLs in place.

- Robust and collaborative working arrangements in school to ensure that all adults working with pupils are appropriately recruited and vetted.
- All staff and volunteers to feel able to raise concerns about poor or unsafe practice with regard to children, and concerns are addressed sensitively and effectively in a timely manner.
- The child's safety and welfare is addressed through the curriculum.
- Staff are well trained and supported in fulfilling their safeguarding duties.
- Children know their rights and responsibilities and know who to turn to in school if they are worried or being harmed.
- Parents are informed about the school's safeguarding responsibilities in school's information literature and again when a child begins school.
- The duty of care towards children is well understood by all and staff are clear about behaviours which are expected of them
- The welfare of children is promoted at all times and there is a culture of vigilance about taking timely and appropriate action for children who need extra help or who may be suffering significant harm.
- There is clarity in school about the role of Educators when safeguarding concerns arise and all staff understand it is not their the responsibility or that of the Principal or Safeguarding Lead to **decide** whether a child/adult has been abused or not- that is the responsibility of social workers.
- A warm and caring atmosphere is evident throughout the school.

The Role of Designated Safeguarding Leads (or DSLs) & DDSLs in schools.

A Designated Safeguarding Lead is the person in school who ensures that their school has in place effective safeguarding arrangements to promote and safeguard the well-being and safety of children and vulnerable adults. All DSLs should have a deputy to act when the the DSL is not in school or available. In large schools, there may be more than one deputy but there must always be one lead, who has overall responsibility for safeguarding policies and procedures and decision-making. This person should have the status and authority within school to ensure safeguarding arrangements are effective across the school and to commit necessary resources where necessary.

The Designated Safeguarding Lead (DSL) must:

- Ensure there is clarity in school about safeguarding responsibilities of different roles within school,
- Ensure all staff understand it is not their the responsibility or that of the Principal or Safeguarding Lead to decide whether a child/adult has been abused or not; that it is the responsibility of social workers.
- Coordinate action within the school and liaise with social care and other agencies over cases of abuse and suspected abuse;
- Hold current, relevant child protection documents and be fully conversant with these procedures;
- Act as a source of expertise and advice within the school, briefing all employees on the relevant contents of the above guidance. This includes briefing new staff and trustees as part of their induction as well as all part-time staff and volunteers;
- Receive reports of alleged or suspected abuse within the school, or incidents

reported by a pupil relating to home or somewhere outside of school, and make child protection referrals and early help referrals, recording and reporting accordingly;

- Refer all cases of suspected abuse to the local authority children's social care and to :
 - The Local Authority Designated Officer (LADO) for child protection concerns which relate to a staff member);
 - Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or
 - The police (cases where a crime may have been committed);
 - NCTL (in cases of professional misconduct).
- Liaise with children's services and other agencies about individual cases;
- Promote a culture of listening to children;
- Ensure that appropriate strategies for recording and reporting incidents are kept within school;
- Provide appropriate feedback to members of staff as and when necessary;
- Review the school's Safeguarding Policy after each incident to consider whether any amendments are required. These amendments should be reported to the Trustee with overall responsibility for safeguarding;
- Press for reconsideration if a child's situation does not seem to improve;
- Conduct an annual review of the school's Safeguarding Policy in conjunction with the Designated Safeguarding Trustee (DST) and feed back to the Board of Trustees each year.
- Maintain a higher level of knowledge about safeguarding than other staff and regularly update own training.
- In larger schools facilitate sensitive sharing of ongoing concerns with other members of the safeguarding team and advise on action to be taken.
- Ensure prompt reporting of any historic abuse allegations which may surface ensuring needs of children/survivors take precedence over any other considerations.
- Ensure students, staff and parents are made aware of the specific risks presented by technology and of the need to keep safe online.

The Safeguarding role and responsibilities of all School Staff

All adults working in, or on behalf of the school have a responsibility to safeguard and promote the welfare of children. This includes a responsibility to provide a safe environment in which children can learn and to identify children who may be in need of extra help or who are suffering, or are likely to suffer significant harm. All staff then have a responsibility to take appropriate action, working with services as needed.

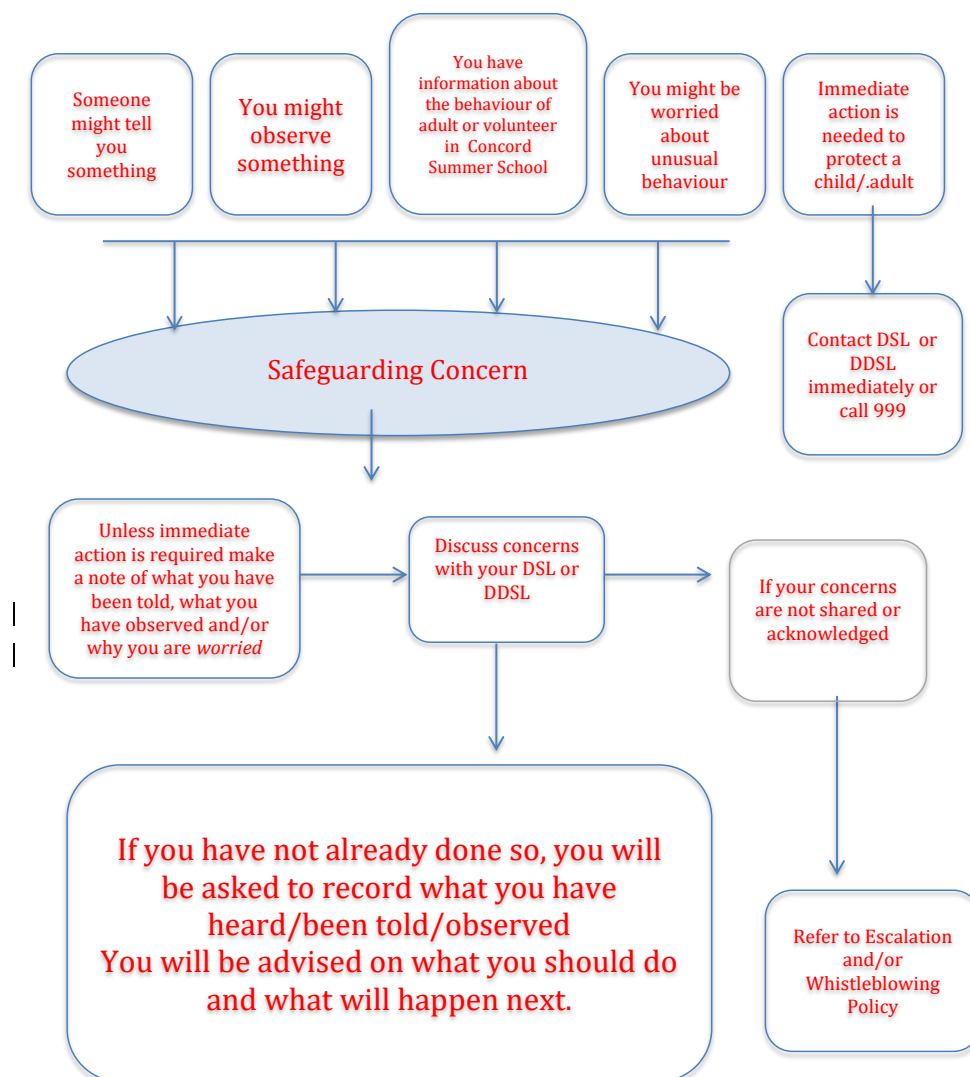
School staff must:

1. Provide a safe and caring environment in which children can learn, feel safe and are listened to.
2. Be able to recognise signs and symptoms of abuse and neglect.
3. Identify concerns early and provide help for children.

4. Know what to say and what not to say to a child and parents when concerns arise.
5. Share concerns with the Principal /Safeguarding Lead when abuse of a child is known or suspected.
6. Keep a record of what they are told and what information they pass on.
7. Ensure that information and concerns are kept confidential and only shared with appropriate persons.
8. Behave at all times in ways which respect and value children and keep them safe.

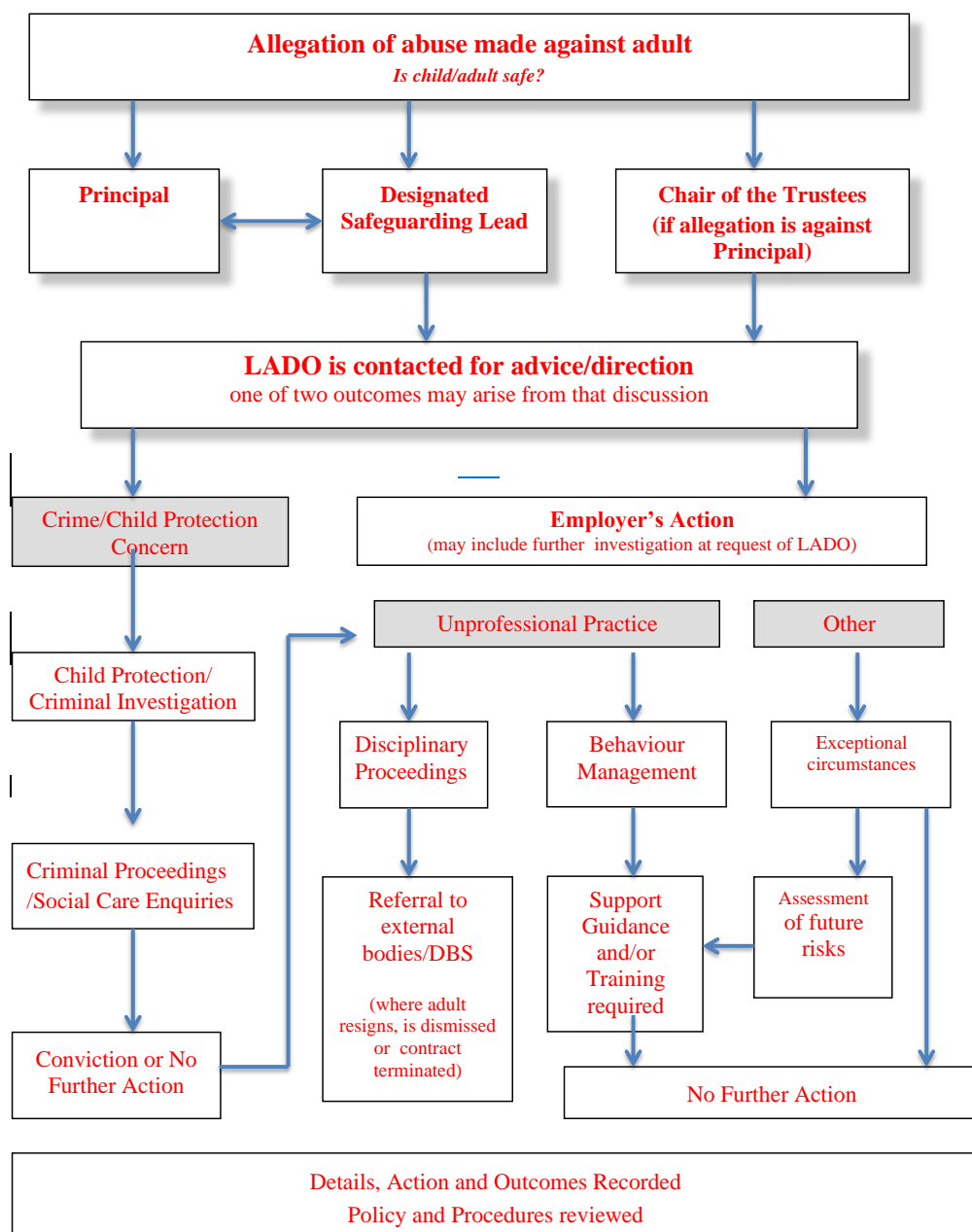
Appendix H – Flowcharts – Processes

Responding to Safeguarding Concerns All Staff



Managing Allegations against Adults

Please read alongside procedures



Appendix I – Different Types of Abuse plus Signs & Symptoms

Definitions of Different Types Of Abuse

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

36. Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

37. Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

38. Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

39. 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.

40. 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.

A List of Possible Signs & Symptoms of Abuse

The following signs may or may not be indicators that abuse has taken place, but the possibility should be considered. Any change in behaviour which does not “feel right” for the child giving cause for concern could be an indicator of abuse.

Signs of possible physical abuse

- Any injuries not consistent with the explanation given for them
- Injuries which occur to the body in places which are not normally exposed to falls or rough games
- Injuries which have not received medical attention
- Reluctance to change for, or participate in, games or swimming
- Bruises, bites, burns and fractures, for example, which do not have an accidental explanation
- The child gives inconsistent accounts for the cause of injuries
- Frozen watchfulness

Signs of possible sexual abuse

- Any allegations made by a child concerning sexual abuse
- The child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age, or regularly engages in sexual play inappropriate for their age
- Sexual activity through words, play or drawing
- Repeated urinary infections or unexplained stomach pains
- The child is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations
- Eating disorders such as anorexia or bulimia.

Signs of possible emotional abuse

- Depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy
- Obsessions or phobias
- Sudden underachievement or lack of concentration
- Seeking adult attention and not mixing well with other children
- Sleep or speech disorders
- Negative statements about self
- Highly aggressive or cruel to others
- Extreme shyness or passivity
- Running away, stealing and lying

Signs of possible neglect

- Dirty skin, body smells, unwashed, uncombed hair and untreated lice
- Clothing that is dirty, too big or small, or inappropriate for weather conditions
- Frequently left unsupervised or alone
- Frequent diarrhoea
- Frequent tiredness
- Untreated illnesses, infected cuts or physical complaints which the carer does not respond to
- Frequently hungry
- Overeating junk food

Signs/ Indicators of FGM

There are a number of indications that FGM **may be about to take place soon**:

The age at which girls undergo FGM varies enormously according to the community. **The procedure may be carried out when the girl is newborn, during childhood or adolescence, at marriage or during the first pregnancy.** However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.

It is believed that **FGM happens to British girls in the UK as well as overseas** (often in the family's country of origin). Girls of school age who are subjected to FGM overseas are thought to be taken abroad at the start of the school holidays, particularly in the summer holidays, in order for there to be sufficient time for her to recover before returning to her studies.

There can also be clearer signs when FGM is **imminent**:

- It may be possible that families will practise FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin.
- A professional may hear reference to FGM in conversation, for example a girl may tell other children about it.
- A girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'.
- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk.
- Parents state that they or a relative will take the child out of the country for a prolonged period.
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent (see Section 2.5 for the nationalities that traditionally practise FGM).
- Parents seeking to withdraw their children from learning about FGM.

There are a number of indications that a girl or woman **has already been subjected** to FGM:

- A girl or woman may have difficulty walking, sitting or standing and may even look uncomfortable.
- A girl or woman may spend longer than normal in the bathroom or toilet due to difficulties urinating.
- A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems.
- A girl or woman may have frequent urinary, menstrual or stomach problems.
- There may be prolonged or repeated absences from school or college.
- A prolonged absence from school or college with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM.
- A girl or woman may be particularly reluctant to undergo normal medical examinations.
- A girl or woman may confide in a professional.
- A girl or woman may ask for help, but may not be explicit about the problem due to embarrassment or fear.
- A girl may talk about pain or discomfort between her legs.

Signs/ Indicators of CSE

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- 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 don't take part in education.

Signs/ Indicators of Peer-On-Peer Abuse

- Failing to attend College, disengaging from classes or struggling to carry out school related tasks to a standard ordinarily expected
- Physical injuries
- Experiencing difficulties with mental health and/ or emotional wellbeing
- Being withdrawn or shy
- Experiencing headaches, stomach aches, anxiety or panic attacks
- Suffering from nightmares or lack of sleep or sleeping too much

- Broader changes in behaviour including alcohol or substance misuse
- Changes in appearance and/or starting to behave in ways which are not appropriate to the child's age
- Abusive behaviour towards others

Appendix J - Recognising the Indicators of vulnerability to radicalisation

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors – it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that College staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity crisis – the student/pupil distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- Personal crisis – the student/pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing family friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal circumstances – migration; local community tensions; and events affecting the student/pupils country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet aspirations – the student/pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
- Experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration;
- Special educational needs – students/pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others

More critical risk factors could include:

- Being in contact with extremist recruiters
- Accessing violent extremist websites, especially those with a social networking element
- Possessing or accessing violent extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining or seeking to join extremist organisations
- Significant changes to appearance and/or behaviour
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

Taken from St Francis Catholic –Preventing Extremism and Radicalisation Policy December 2014