



ST. JOSEPH'S COLLEGE  
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# SAFEGUARDING AND CHILD PROTECTION POLICY

<b>Policy Owner</b>	<b>Associated documents</b>	<b>Legal Framework</b>
<p>Sean Hatton</p> <p>DSL</p>	<p>College Behaviour, Rewards and sanctions policy</p> <p>Anti-bullying policy</p> <p>Attendance policy</p>	<p>See section 4 in policy for further detail</p> <ul style="list-style-type: none"><li>• <a href="#">Keeping Children Safe in Education (2024)</a>,</li><li>• <a href="#">Working Together to Safeguard Children (2023)</a>,</li><li>• Maintained schools governance guide,</li><li>• Part 3 of the schedule to the <a href="#">Education (Independent School Standards) Regulations 2014</a>,</li><li>• <a href="#">The Children Act 1989</a> (and <a href="#">2004 amendment</a>),</li><li>• Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the <a href="#">Serious Crime Act 2015</a>,</li><li>• <a href="#">Statutory guidance on FGM</a>,</li><li>• <a href="#">The Rehabilitation of Offenders Act 1974</a>,</li><li>• Schedule 4 of the <a href="#">Safeguarding Vulnerable Groups Act 2006</a>,</li><li>• <a href="#">Information Sharing (2024)</a>,</li><li>• <a href="#">Online Safety Act 2023</a>,</li><li>• <a href="#">Disqualification under the childcare act 2006 (Updated 2018)</a>,</li></ul>



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		<ul style="list-style-type: none"><li>• <a href="#">The Prevent Duty (2023)</a>,</li><li>• <a href="#">The Human Rights Act (1998)</a>,</li><li>• <a href="#">The Equality Act (2010)</a>,</li><li>• <a href="#">Children Missing Education (Sept 2016)</a>,</li><li>• <a href="#">Relationships Education, Relationships and Sex Education (RSE) and Health Education (2021)</a>.</li><li>• <a href="#">Working together to improve school attendance (2024)</a>,</li><li>• Government guidance on <a href="#">Forced Marriage</a></li><li>• <a href="#">Promoting the education of looked after children and previously looked after children (2018)</a>,</li><li>• <a href="#">Mental health and behaviour in schools (2018)</a>,</li><li>• <a href="#">The UK Council for Internet Safety's Sharing nudes and semi-nudes: advice for education settings working with children and young people</a>,</li><li>• <a href="#">statutory framework for the Early Years Foundation Stage</a></li></ul>
<b>Review by</b> September 2024	<b>Review frequency</b> Annually	<b>Next Review date</b> September 2025



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Changes History:

Version	Date	Amended by:	Substantive changes:	Purpose
1.0	23.06.2024	Assistant Head (W&S)	Change to structure	Ease of reference
			Changes from Keeping Children Safe in Education 2024 and Working Together to Safeguard Children 2023 included	Compliance
			Removal of names, instead referring to job roles, with exception of key contact info in section 1	Futureproofing.
			Legislation (copied), linked policies, changes history and admin info moved to coversheet	In line with College procedures

1.



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## Safeguarding policy

This policy relates to all sections of St Joseph's College, including the Early Years Foundation Stage.

### 2. Key contact information

#### 2.1. Key school contacts

Role	Name	Contact number	Email
Designated Safeguarding Lead	Sean Hatton	07540 236203 01189 661000	<a href="mailto:sean.hatton@sjcr.org.uk">sean.hatton@sjcr.org.uk</a>
Deputy Designated Safeguarding Leads	Natalia Jwaideh Sharon Boccaccini Jess Kirkpatrick Dorinda Bray Alice Maxwell Kate Holdcroft	01189 661000	<a href="mailto:natalia.jwaideh@sjcr.org.uk">natalia.jwaideh@sjcr.org.uk</a> <a href="mailto:sharon.boccaccini@sjcr.org.uk">sharon.boccaccini@sjcr.org.uk</a> <a href="mailto:jess.kirkpatrick@sjcr.org.uk">jess.kirkpatrick@sjcr.org.uk</a> <a href="mailto:dorinda.bray@sjcr.org.uk">dorinda.bray@sjcr.org.uk</a> <a href="mailto:alice.maxwell@sjcr.org.uk">alice.maxwell@sjcr.org.uk</a> <a href="mailto:kate.holdcroft@sjcr.org.uk">kate.holdcroft@sjcr.org.uk</a>
Head	Laura Stotesbury	01189 661000	<a href="mailto:laura.stotesbury@sjcr.org.uk">laura.stotesbury@sjcr.org.uk</a>
Chair of Governors	Hilary Buckle		<a href="mailto:chair@sjcr.org.uk">chair@sjcr.org.uk</a>
Safeguarding Governor	Amy Bainbridge	Contact details can be obtained from Michele Gravenor <a href="mailto:michele.gravenor@sjcr.org.uk">michele.gravenor@sjcr.org.uk</a>	

#### 2.2. Additional school contacts:

2.2.1. Bursar – [lynn.douglas@sjcr.org.uk](mailto:lynn.douglas@sjcr.org.uk)

#### 2.3. Key external contacts

Children's Single Point of Access	Duty Social worker	Brighter Futures for Children, Civic Offices, Reading, RG1 2LU	0118 937 3641 Emergency Duty Service (outside of office hours) Tel: 01344 351999	<a href="mailto:cspoa@brighterfuturesforchildren.org">cspoa@brighterfuturesforchildren.org</a>
Prevent Officer Thames Valley Police	Prevent Officer	Reading Police Station, Castle Street, Reading RG1 7TH	0800 011 3764 (National advice line)	<a href="mailto:preventreferralsreading@thamesvalley.pnn.police.uk">preventreferralsreading@thamesvalley.pnn.police.uk</a>



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Community Safety Partnership	Joanne Middlemass	Reading Borough Council, Civic Offices, Reading, RG1 2LU	0118 937 4922	<a href="mailto:Joanne.middlemass@brighterfuturesforchildren.org">Joanne.middlemass@brighterfuturesforchildren.org</a>
Service Manager for Early Help and Prevention (including early years)	Rebecca Bateman	Brighter Futures for Children, Civic Offices, Reading, RG1 2LU	0118 937 6012	<a href="mailto:Rebecca.bateman@brighterfuturesforchildren.org">Rebecca.bateman@brighterfuturesforchildren.org</a>
Education Welfare Service	Scott Bennett	Brighter Futures for Children, The Avenue Centre, Tilehurst, Reading	0118 937 6545	<a href="mailto:scott.bennett@brighterfuturesforchildren.org">scott.bennett@brighterfuturesforchildren.org</a>
Local Authority Designated Officer	Sarah Rae Sue Darby	Brighter Futures for Children, Civic Offices, Reading, RG1 2LU	01189 372684	<a href="mailto:LADO@brighterfuturesforchildren.org">LADO@brighterfuturesforchildren.org</a>
Safeguarding and Children Missing Education Officer (including exclusions)	Fiona Hostler	Brighter Futures for Children, Civic Offices, Reading, RG1 2LU	0118 937 4336 07811 422419	<a href="mailto:Fiona.hostler@brighterfuturesforchildren.org">Fiona.hostler@brighterfuturesforchildren.org</a>
Schools Police Officer	Steven Marr	Thames Valley Police		<a href="mailto:steven.marr@thamesvalley.police.uk">steven.marr@thamesvalley.police.uk</a>

### 3. Introduction

- 3.1. The safety and welfare of all our pupils is our highest priority and we will always consider the best interests of the child. Over and above our obligations under the Human Rights Act 1998 and the Equality Act 2010, our business is to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety.
- 3.2. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. As a College we will always follow a 'child-centred' approach. This means that we will consider, at all times, what is in the **best interests** of the child.



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## 4. Definitions

- 4.1. As outlined in 'Keeping Children Safe in Education (Sept 2024), **Safeguarding** and promoting the welfare of children is defined as:
- 4.1.1. Providing help and support to meet the needs of children as soon as problems emerge.
  - 4.1.2. Protecting children from maltreatment, whether that is within or outside the home, including online.
  - 4.1.3. Preventing the impairment of children's mental and physical health or development
  - 4.1.4. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
  - 4.1.5. Taking action to enable all children to have the best outcomes.
  - 4.1.6. ('Children' includes everyone under the age of 18 and will include all pupils at the College)
- 4.2. **Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online,
- 4.3. **Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.
- 4.4. **Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.
- 4.5. **Sharing of Nudes and semi-nudes** (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos, or live streams,
- 4.6. The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
- 4.6.1. The local authority (LA),
  - 4.6.2. Integrated care boards (previously known as clinical commissioning groups) for an area within the LA,
  - 4.6.3. The chief officer of police for a police area in the LA area,
- 4.7. **Victim** is a widely understood and recognised term, though we understand that not everyone who has been subjected to abuse considers themselves a victim or would



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want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

- 4.8. **Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

## 5. Legislation and linked policies

5.1. This policy is based on, and linked to:

- 5.1.1. the Department for Education's (DfE) statutory guidance [Keeping Children Safe in Education \(2024\)](#),
- 5.1.2. the DfE's [Working Together to Safeguard Children \(2023\)](#),
- 5.1.3. the Maintained schools governance guide,
- 5.1.4. Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- 5.1.5. [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- 5.1.6. Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18,
- 5.1.7. [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM,
- 5.1.8. [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children,
- 5.1.9. Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- 5.1.10. the DfE's guidance on [Information Sharing \(2024\)](#),
- 5.1.11. the [Online Safety Act 2023](#),
- 5.1.12. [Disqualification under the childcare act 2006 \(Updated 2018\)](#),
- 5.1.13. [The Prevent Duty \(2023\)](#), which explains schools' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism,
- 5.1.14. [The Human Rights Act \(1998\)](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may



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breach any or all of the rights which apply to individuals under the [European Convention on Human Rights \(ECHR\)](#),

- 5.1.15. [The Equality Act \(2010\)](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it is proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they are being disproportionately subjected to sexual violence or harassment,
- 5.1.16. [Children Missing Education \(Sept 2016\)](#),
- 5.1.17. [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education \(2021\)](#). Note this is currently under consultation.
- 5.1.18. [Working together to improve school attendance \(2024\)](#),
- 5.1.19. Government guidance on [Forced Marriage](#),
- 5.1.20. [Promoting the education of looked after children and previously looked after children \(2018\)](#),
- 5.1.21. [Mental health and behaviour in schools \(2018\)](#),
- 5.1.22. [The UK Council for Internet Safety's Sharing nudes and semi-nudes: advice for education settings working with children and young people](#),
- 5.1.23. This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

## 6. Equality in safeguarding

- 6.1. Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse





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circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

### 6.2. We give special consideration to children who:

#### 6.2.1. Have special educational needs (SEN) or disabilities or health conditions.

6.2.1.1. We recognise that pupils with SEND, or certain health conditions can face additional safeguarding challenges and barriers can exist when recognising abuse and neglect. These can include:

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

#### 6.2.2. Are young carers.

#### 6.2.3. May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality,

6.2.3.1. The fact that a child or a young person may be lesbian, gay, bisexual or gender questioning is not in itself an inherent risk factor for harm. However, we acknowledge that children who are lesbian, gay, bisexual or gender questioning can be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, bisexual or gender questioning (whether they are or not) can be just as vulnerable as children who identify as.

6.2.3.2. However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of



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autism spectrum disorder and/or attention deficit hyperactivity disorder.

- 6.2.3.3. It is recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.
- 6.2.3.4. As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to our [Guidance for Schools and Colleges in relation to Gender Questioning Children \(Draft form\)](#), when deciding how to proceed.
- 6.2.3.5. Risks can be compounded where children who are lesbian, gay, bisexual or gender questioning lack a trusted adult with whom they can be open. The College endeavours to reduce the additional barriers faced and provide a safe space for children to speak out or share their concerns with members of staff.



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- 6.2.4. Have English as an additional language.
  - 6.2.5. Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
  - 6.2.6. Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
  - 6.2.7. Are asylum seekers.
  - 6.2.8. Are at risk due to either their own or a family member's mental health needs.
  - 6.2.9. Are looked after or previously looked after.
  - 6.2.10. Are missing or absent from education for prolonged periods and/or repeat occasions.
  - 6.2.11. Whose parent/carer has expressed an intention to remove them from school to be home educated.
- 6.3. Equality, diversity, and inclusion is part of our PSHEE and RSE curriculum and is firmly embedded in the ethos of the College, we hold a zero-tolerance policy for all forms of bullying, abuse and discrimination.

## 7. Roles and responsibilities

- 7.1. Our whole College approach to safeguarding means that all members of staff have a duty to safeguard our pupils' welfare and must therefore familiarise themselves and comply at all times with this policy.
- 7.2. This includes a duty both to children in need and to children at risk of harm, as well as preventing impairment of children's mental and physical health.
- 7.3. This policy applies to all staff, volunteers and governors and is consistent with the procedures of the 3 safeguarding partners.
- 7.4. Our policy and procedures also apply to the extended day program and off-site activities.
- 7.5. The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of



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zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia, and sexual violence/harassment. This will be underpinned by our:

- 7.5.1. Behaviour policy
- 7.5.2. Pastoral support system
- 7.5.3. Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - 7.5.3.1. Healthy and respectful relationships
  - 7.5.3.2. Boundaries and consent
  - 7.5.3.3. Stereotyping, prejudice, and equality
  - 7.5.3.4. Body confidence and self-esteem
  - 7.5.3.5. How to recognise an abusive relationship (including coercive and controlling behaviour)
  - 7.5.3.6. The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support.
  - 7.5.3.7. What constitutes sexual harassment and sexual violence and why they are always unacceptable.
- 7.5.4. All staff and volunteers will read and understand part 1 and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education \(2024\)](#), and review this guidance at least annually.
- 7.6. All staff, volunteers and governors will:
  - 7.6.1. Complete an online assessment with Educare to evidence their understanding of the latest version of Keeping Children Safe in Education.
  - 7.6.2. reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they will be interacting with online)
  - 7.6.3. provide a safe space for pupils who are lesbian, gay, bisexual or gender questioning to speak out and share their concerns.
  - 7.6.4. notify the College immediately if there are any reasons why they must not be working with children.
    - 7.6.4.1. The DfE have removed disqualification by association for individuals working in schools in the 2018 updates. The Childcare (Disqualification) Regulations 2009 apply to those providing early



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years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 and to those who are directly concerned in the management of that childcare.

7.6.4.2. Staff who are disqualified from childcare or registration, may apply to Ofsted for a waiver of disqualification. Such staff may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the Head or the Bursar for more details.

7.6.4.3. In the case of Educational Visits, the organisations visited have been checked for suitability to ensure the College's care for the safety of the pupils.

7.7. All staff, volunteers will be aware of:

7.7.1. The Safeguarding Policy

7.7.2. The Staff Code of Conduct

7.7.3. The Behaviour Policy

7.7.4. The role of the Designated Safeguarding Leads

7.7.5. Online safety which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring

7.7.6. The safeguarding response to children who go missing from education.

7.7.7. The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.

7.7.8. The process for making referrals to the local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.

7.7.9. What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

7.7.10. The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of



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being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

- 7.7.11. New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm.
  - 7.7.12. The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
  - 7.7.13. The fact that children can be at risk of harm inside and outside of their home, at school and online.
  - 7.7.14. The fact that children who are (or who are perceived to be) lesbian, gay, bi, or trans (lesbian, gay, bisexual or gender questioning) can be targeted by other children.
  - 7.7.15. That a child and their family may be experiencing multiple needs at the same time
  - 7.7.16. What to look for to identify children who need help or protection
- 7.8. The Governors will:
- 7.8.1. Evaluate and agree the Safeguarding Policy, ensuring that the policy is in line with The College's core values.
  - 7.8.2. Approve this policy at each review, ensure it complies with the law and hold the head to account for its implementation.
  - 7.8.3. Appoint a Governor to lead and monitor the effectiveness of this policy.
  - 7.8.4. Complete Annual Safeguarding training as recommended by the College's DSL and Link Safeguarding Governor.
  - 7.8.5. Read and understand the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education \(2024\)](#), in its entirety and review this guidance at least annually
  - 7.8.6. Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
  - 7.8.7. Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010, and the College's local multi-agency safeguarding arrangements.
  - 7.8.8. Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with the advice from safeguarding partners.
  - 7.8.9. Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:



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- 7.8.9.1. Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
- 7.8.9.2. Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.
- 7.8.10. Make sure:
  - 7.8.10.1. The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
  - 7.8.10.2. Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
  - 7.8.10.3. The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
  - 7.8.10.4. The College has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 6 of this policy covers this procedure.
  - 7.8.10.5. That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- 7.8.11. Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
- 7.8.12. Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed.
- 7.8.13. Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- 7.8.14. Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.
- 7.8.15. As outlined in paragraph 92 of [Keeping Children Safe in Education \(2024\)](#), it is important that governing bodies and proprietors are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance '[For](#)



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[Organisations](#)' which includes information about your obligations and how to comply, including protecting personal information, and providing access to official information.

- 7.9. The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 6).
- 7.10. The Head will:
- 7.10.1. Cultivate an ethos within their school community where everyone in the school's community feels confident, competent, comfortable and supported to draw safeguarding issues to the attention of the Head, the Designated Safeguarding Lead (DSL) or the Designated Safeguarding Governor so that anyone is able to pose safeguarding questions with "respectful uncertainty" as part of their shared responsibility to safeguard children and young people
  - 7.10.2. Ensure that staff (including temporary staff) and volunteers:
    - 7.10.2.1. Are informed of the College systems which support safeguarding, including this policy, as part of their induction
    - 7.10.2.2. Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
  - 7.10.3. Communicating this policy to parents/carers when their child joins the College and via the College's website.
  - 7.10.4. Maintain an environment where children or young people feel secure and are encouraged to talk and are listened to.
  - 7.10.5. Promote adults in the school to children or young people whom they can approach if they are worried.
  - 7.10.6. Appoint a Designated Safeguarding Lead (and if appropriate Deputy Designated Safeguarding Lead) and provide them such time as to discharge their responsibilities in relation to Child Protection and Safeguarding;





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ensuring they are appropriately trained and have the capacity and authority to undertake this role.

- 7.10.7. Ensure that all staff, volunteers and Governors have appropriate training, updating the content regularly, and/or guidance on appropriate safeguards and procedures for raising safeguarding issues.
- 7.10.8. Take all reasonable measures to ensure risks of harm to children or young people's welfare are minimised.
- 7.10.9. Promote health and safety, promoting safe practice and challenge unsafe practice.
- 7.10.10. Include opportunities in the Personal, Social, Health and Economic Education (PSHEE) curriculum for children and young people to develop the skills they need to recognise and stay safe from abuse.
- 7.10.11. Put in place and promote robust anti-bullying, including cyber bullying, strategies.
- 7.10.12. Meet the health needs of children and young people with medical conditions.
- 7.10.13. Provide first aid.
- 7.10.14. Maximise school security.
- 7.10.15. Tackle drugs and substance misuse.
- 7.10.16. Ensure that procedures are followed in dealing with allegations of abuse against staff and volunteers.
- 7.10.17. Follow the College's [safer recruitment policy](#) in respect to safer recruitment
- 7.10.18. Refer immediately, and through the proper procedure, any concern relating to staff to the Local Authority Designated Officer (LADO)
- 7.10.19. If appropriate, making sure each child in the Early Years Foundation Stage is assigned a key person.
- 7.10.20. Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.
- 7.10.21. In our Early years and Prep settings, ensure the relevant staffing ratios are met, where applicable
- 7.10.22. In our Early years settings:
  - 7.10.22.1. Making sure each child in the Early Years Foundation Stage is assigned a key person.



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7.10.22.2. Overseeing the safe use of technology, and all electronic devices with imaging and sharing capabilities

## 7.11. The Designated Safeguarding Lead (DSL)

7.11.1. The DSL is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding.

7.11.2. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

7.11.3. When the DSL is absent, the DDSL(s) will act as cover.

7.11.4. The DSL will be given the time, funding, training, resources and support to:

7.11.4.1. provide advice and support to other staff on child welfare and child protection matters.

7.11.4.2. take part in strategy discussions and inter-agency meetings and/or support other staff to do so.

7.11.4.3. contribute to the assessment of children.

7.11.4.4. refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.

7.11.4.5. help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children,



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including children with a social worker, are experiencing, or have experienced, with teachers and leadership staff.

- 7.11.4.6. have a good understanding of harmful sexual behaviour.
- 7.11.4.7. Have a good understanding of the filtering and monitoring systems and processes in place at the College.
- 7.11.4.8. Ensure all staff have appropriate PREVENT training and induction.
- 7.11.4.9. Act as a lead practitioner for the local authority.
- 7.11.5. The DSL will also:
  - 7.11.5.1. keep the Head informed of any issues,
  - 7.11.5.2. liaise with local authority case managers and designated officers for child protection concerns as appropriate.
  - 7.11.5.3. discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies.
  - 7.11.5.4. be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
  - 7.11.5.5. be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search. At St Joseph's College, only the DSL and/or Head can give authority for a student to be seen by the Police on the school site. We recognise as a College that schools are a safe place for children/young people and therefore we will liaise with the Police to discuss such visits taking away from the schools site. However, we recognise that in some



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circumstances this may not be possible such as section 47 enquiries or criminal behaviour taking place on school property.

7.12. More information about the role of the DSL can be found in appendix 5.

## 8. Confidentiality

- 8.1. The College's approach to confidentiality and data protection is outlined in the [Parent's/Carer's Privacy Notice](#).
- 8.2. Timely information sharing is essential to effective safeguarding.
- 8.3. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- 8.4. The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- 8.5. If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- 8.6. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- 8.7. If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
  - 8.7.1. There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.
  - 8.7.2. The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.
  - 8.7.3. The DSL should consider that:
    - 8.7.3.1. Parents or carers should normally be informed (unless this would put the victim at greater risk)
    - 8.7.3.2. The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.
    - 8.7.3.3. Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal



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responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

8.8. Regarding anonymity, all staff will:

- 8.8.1. Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
- 8.8.2. Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully



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considering which staff should know about the report, and any support for children involved.

- 8.8.3. Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- 8.9. The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
- 8.10. If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).
- 8.11. Confidentiality is also addressed in this policy with respect to record-keeping in section 17, and allegations of abuse against staff in appendix 6.

### **9. Recognising abuse and taking action**

- 9.1. All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:
  - 9.1.1. Is disabled.
  - 9.1.2. Has special educational needs (whether or not they have a statutory education health and care plan)
  - 9.1.3. Is a young carer.
  - 9.1.4. Is bereaved.
  - 9.1.5. Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime.
  - 9.1.6. Is frequently missing/goes missing from care or home.
  - 9.1.7. Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
  - 9.1.8. Is at risk of being radicalised or exploited.
  - 9.1.9. Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online.
  - 9.1.10. Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
  - 9.1.11. Is misusing drugs or alcohol.
  - 9.1.12. Is suffering from mental ill health.
  - 9.1.13. Has returned home to their family from care.



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- 9.1.14. Is at risk of so-called 'honour'-based abuse such as female genital mutilation or forced marriage.
  - 9.1.15. Is a privately fostered child.
  - 9.1.16. Has a parent or carer in custody.
  - 9.1.17. Is missing education, or persistently absent from school, or not in receipt of full-time education.
  - 9.1.18. Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- 9.2. All staff should recognise that children can be at risk of harm inside and outside of school, inside and outside of home, and online.
- 9.3. Exercising 'professional curiosity' and knowing what to look for is vital for the early identification of abuse, neglect, and exploitation so that staff are able to identify cases of children who may be in need of help or protection.
- 9.4. Staff, volunteers, and Governors must follow the procedures set out below in the event of a safeguarding issue.
- 9.5. Please note – in this and subsequent sections, references to the DSL should be taken to mean "the DSL (or deputy DSL)."
- 9.6. If a child is suffering or likely to suffer harm, or in immediate danger:
- 9.6.1. Make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or in immediate danger. Anyone can make a referral.
  - 9.6.2. Tell the DSL as soon as possible if you make a referral directly.
  - 9.6.3. Local Procedures for making a referral can be viewed in appendix 6.
- 9.7. If a child discloses a safeguarding issue to you, adults within the College should:
- 9.7.1. Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
  - 9.7.2. Remember that the College is not the investigator – their role is to collect information and share if required with the appropriate agency/ies.
  - 9.7.3. Stay calm and do not show that you are shocked or upset.
  - 9.7.4. Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
  - 9.7.5. Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.



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- 9.7.6. Write up the conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
  - 9.7.7. Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.
  - 9.7.8. Bear in mind that some children may:
    - 9.7.8.1. Not feel ready, or know how to tell someone that they are being abused, exploited or neglected.
    - 9.7.8.2. Not recognise their experiences as harmful
    - 9.7.8.3. Feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.
  - 9.7.9. None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.
- 9.8. If you discover that FGM has taken place, or a pupil is at risk of FGM:
- 9.8.1. The Department for Education's [Keeping Children Safe in Education \(2024\)](#), explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
  - 9.8.2. FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting,' 'circumcision' or 'initiation'.
  - 9.8.3. Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 2.
  - 9.8.4. Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a pupil under 18, or observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth should immediately report this





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to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

- 9.8.5. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.
  - 9.8.6. Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.
  - 9.8.7. The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff must not examine pupils.
  - 9.8.8. Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out or discovers that a pupil aged 18 or over appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures.
- 9.9. If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger):
- 9.9.1. Staff should follow the local procedures for their school as shown in appendix 6.
  - 9.9.2. Where possible, speak to the DSL first to agree a course of action.
  - 9.9.3. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.
  - 9.9.4. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.
- 9.10. Early help
- 9.10.1. If early help is appropriate, the DSL will lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.
  - 9.10.2. We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.
  - 9.10.3. The DSL will keep the case under constant review and the College will consider a referral to local authority children's social care if the situation



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does not seem to be improving. Timelines of interventions will be monitored and reviewed.

## 9.11. Referral

- 9.11.1. If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.
- 9.11.2. If you make a referral directly, you must tell the DSL as soon as possible.
- 9.11.3. The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.
- 9.11.4. If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.
- 9.11.5. Staff should follow the local procedures for their school as shown in appendix 6.

## 9.12. If you have concerns about extremism:

- 9.12.1. If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.
- 9.12.2. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.
- 9.12.3. Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.
- 9.12.4. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and Governors can call to raise concerns about extremism with respect to a pupil. You can also email



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[counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

9.12.5. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

9.12.5.1. think someone is in immediate danger.

9.12.5.2. think someone may be planning to travel to join an extremist group.

9.12.5.3. see or hear something that may be terrorist-related.

9.13. If you have a mental health concern:

9.13.1. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

9.13.2. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

9.13.3. If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in the local procedures for their school as shown in appendix 6.

9.13.4. If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.

9.14. Concerns about a staff member, supply teacher, volunteer, or contractor

9.14.1. If you have concerns about a member of staff (including a supply teacher, volunteer, or contractor), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the Head as soon as possible. If the concerns/allegations are about the Head, speak to the Chair of Governors as soon as possible.

9.14.2. Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer, or contractor) to the Head, report it directly to the local authority designated officer (LADO).

9.14.3. If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow the College safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

9.14.4. Further details of raising concerns about staff can be viewed in the [Whistleblowing Policy](#).

9.15. Allegations of abuse made against other pupils.

9.15.1. The College recognises that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter," "just having a laugh"



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or “part of growing up” as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

- 9.15.2. The College also recognises the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.
- 9.15.3. Most cases of pupils hurting other pupils will be dealt with under the school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
- 9.15.3.1. is serious, and potentially a criminal offence.
  - 9.15.3.2. could put pupils in the school at risk.
  - 9.15.3.3. is violent.
  - 9.15.3.4. involves pupils being forced to use drugs or alcohol.
  - 9.15.3.5. involves sexual exploitation, sexual abuse, or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and/or semi-nudes).
  - 9.15.3.6. See Appendix 2 for more information about Child-on-child Abuse.
- 9.15.4. If a pupil makes an allegation of abuse against another pupil:
- 9.15.4.1. You must record the allegation and tell the DSL, but do not investigate it.
  - 9.15.4.2. The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
  - 9.15.4.3. The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
  - 9.15.4.4. The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.
  - 9.15.4.5. In liaising with external agencies, the DSL will assess the level of support required for children, ensuring that should targeted provision need to be put in place, this is sought through the



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recognised referrals. Appropriate in school support will be offered for all students where necessary.

9.15.4.6. If applicable, safety plans/risk assessments will be put in place to support, and ensure the safety of, all children.

9.15.4.7. If necessary, sanctions will be applied in line with the College's [Behaviour, Rewards and Sanctions policy](#).

9.15.5. If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

9.15.6. The College will create a supportive environment in school and minimise the risk of child-on-child abuse by:

9.15.6.1. challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images

9.15.6.2. being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.

9.15.6.3. ensuring our curriculum helps to educate pupils about appropriate behaviour and consent.

9.15.6.4. ensuring pupils are able to easily and confidently report abuse using our reporting systems.

9.15.6.5. ensuring staff reassure victims that they are being taken seriously.

9.15.6.6. being alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.

9.15.6.7. supporting children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure



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the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.

9.15.6.8. considering intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

9.15.6.9. ensuring staff are trained to understand:

- 9.15.6.9.1. how to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - 9.15.6.9.2. that even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”.
  - 9.15.6.9.3. that if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - 9.15.6.9.3.1. children can show signs or act in ways they hope adults will notice and react to
    - 9.15.6.9.3.2. a friend may make a report.
    - 9.15.6.9.3.3. a member of staff may overhear a conversation.
    - 9.15.6.9.3.4. a child’s behaviour might indicate that something is wrong.
  - 9.15.6.9.4. that certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
  - 9.15.6.9.5. that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
  - 9.15.6.9.6. the important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
  - 9.15.6.9.7. that they should speak to the DSL if they have any concerns
  - 9.15.6.9.8. That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.
- 9.15.7. The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.
- 9.15.7.1. Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident does not (in itself) prevent our school from coming to its own conclusion about what happened and



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imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- 9.15.7.1.1. Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this.
- 9.15.7.1.2. There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

## 9.16. The sharing of nudes and/or semi-nudes

- 9.16.1. If you are made aware of an incident involving the consensual or non-consensual sharing of nude and/or semi-nude images/videos (also known as



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'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

9.16.2. You must not:

9.16.2.1. view, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.

9.16.2.2. delete the imagery or ask the pupil to delete it.

9.16.2.3. ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

9.16.2.4. share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.

9.16.2.5. say or do anything to blame or shame any young people involved.

9.16.3. You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

9.16.4. The DSL will make an immediate referral to police and/or children's social care if:

9.16.4.1. the incident involves an adult.

9.16.4.2. there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)

9.16.4.3. what the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

9.16.4.4. the imagery involves sexual acts and any pupil in the imagery is under 13.

9.16.4.5. the DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming).

9.16.5. If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

9.16.6. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

9.16.7. They will hold interviews with the pupils involved (if appropriate).





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- 9.16.8. If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.
- 9.16.9. The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.
- 9.16.10. If it is necessary to refer an incident to the police, this will be done through dialling 101.
- 9.16.11. All incidents involving the sharing of nudes and/or semi-nudes and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 17 of this policy also apply to recording incidents of sexting.
- 9.16.12. Pupils are taught about the issues surrounding sexting as part of our PSHEE and RSHE programmes. Teaching covers the following in relation to sexting:
- 9.16.12.1. What it is
  - 9.16.12.2. How it is most likely to be encountered
  - 9.16.12.3. The consequences of requesting, forwarding or providing such images, including when it is and is not abusive.
  - 9.16.12.4. Issues of legality
  - 9.16.12.5. The risk of damage to people's feelings and reputation

## **10. Notifying parents or carers**

- 10.1. Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure however as per section 9, there are cases where this contact will not have taken place prior to a referral and staff should act without delay.
- 10.2. Where there is a split family, the DSL will endeavour to ensure that all those that hold Parental responsibility are kept informed although if we believe that notifying the parents or carers would increase the risk to the child or the other parent, a referral can be made without doing so we will discuss this with further the local authority children's social care team.
- 10.3. Other staff will only talk to parents about any such concerns following consultation with the DSL or DDSL.
- 10.4. In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved however as per section 9, there are cases where his contact will not have taken place prior to a referral. We will think carefully about what information we provide about the other child involved, and when.



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We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

- 10.5. The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):
  - 10.5.1. Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed.
  - 10.5.2. Meet with the alleged perpetrator's parents or carers to discuss support for them, and what is being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)
- 10.6. The child's wishes will **always** be taken into account when dealing with a disclosure although in some cases, action may have to be taken against their wishes to ensure that they or others are kept safe.

### **11. Pupils with special educational needs, disabilities, or health issues**

- 11.1. We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:
  - 11.1.1. Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
  - 11.1.2. Pupils being more prone to peer group isolation or bullying than other pupils.
  - 11.1.3. The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
  - 11.1.4. Communication barriers and difficulties in overcoming these barriers.
  - 11.1.5. Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

### **12. Pupils with a social worker**

- 12.1. Pupils may need a social worker due to safeguarding or welfare needs. The College recognises that a child's experiences of adversity and trauma can leave them vulnerable



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to further harm as well as potentially creating barriers to attendance, learning, behaviour, and mental health.

- 12.2. The DSL and all members of staff will work with and support social workers to help protect vulnerable children.
- 12.3. Where staff are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare, and educational outcomes. For example, it will inform decisions about:
  - 12.3.1. Responding to unauthorised absence or missing education where there are known safeguarding risks.
  - 12.3.2. The provision of pastoral and/or academic support

## **13. Looked after (LAC) and previously looked after children (PLAC)**

- 13.1. We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:
  - 13.1.1. Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
  - 13.1.2. The DSL has details of children's social workers and relevant virtual school heads.
- 13.2. The College has appointed a designated teacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).
- 13.3. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.
- 13.4. As part of their role, the designated teacher will:
  - 13.4.1. Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
  - 13.4.2. Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing



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how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

13.4.3. The designated teacher for LAC and PLAC students can be the DSL.

### 14. Reporting systems for our pupils

- 14.1. Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.
- 14.2. We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.
- 14.3. To achieve this, we will:
  - 14.3.1. Put systems in place in each for pupils to confidently report abuse.
  - 14.3.2. Ensure reporting systems are well promoted, easily understood and easily accessible for pupils.
  - 14.3.3. Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

### 15. Online safety, mobile phones, and other technology

- 15.1. We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.
- 15.2. To address this, The College aims to:
  - 15.2.1. Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and Governors.
  - 15.2.2. Protect and educate the whole College community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as Mobile Phones)
  - 15.2.3. Set clear guidelines for the use of mobile phones for the whole College community.
  - 15.2.4. Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- 15.3. Our approach to online safety is based on addressing the following categories of risk:
  - 15.3.1. **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
  - 15.3.2. **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults



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posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

15.3.3. **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending, and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

15.3.4. **Commerce** – risks such as online gambling, inappropriate advertising, phishing, and/or financial scams

15.4. To meet our aims and address the risks above, we will:

15.4.1. Educate pupils about online safety as part of our curriculum. For example:

15.4.1.1. The safe use of social media, the internet and technology

15.4.1.2. Keeping personal information private

15.4.1.3. How to recognise unacceptable behaviour online

15.4.1.4. How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim.

15.4.2. Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.

15.4.3. Educate parents/carers about online safety via our website, communications sent directly to them and during parents' information evenings. We will also share clear procedures with them so they know how to raise concerns about online safety.

15.4.4. Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

15.4.4.1. Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present.

15.4.4.2. Staff will not take pictures or recordings of pupils on their personal phones or cameras.

15.4.5. Make all pupils, parents/carers, staff, volunteers and Governors aware that they are expected to sign an agreement regarding the acceptable use of



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the internet in school, use of the College's ICT systems and use of their mobile and smart technology.

- 15.4.6. Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.
  - 15.4.7. Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation.
  - 15.4.8. Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the College's IT systems.
  - 15.4.9. Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by the College community.
  - 15.4.10. Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.
  - 15.4.11. Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.
- 15.5. The Head is responsible for ensuring that staff understand this policy, and that it is being implemented consistently throughout the school.
- 15.6. The DSL takes lead responsibility for online safety in school, in particular:
- 15.6.1. Supporting the Head in ensuring that staff understand this policy and that it is being implemented consistently throughout the College.
  - 15.6.2. Working with the Head and Governors to review this section of the policy annually and ensure the procedures and implementation are updated and reviewed regularly.
  - 15.6.3. Taking the lead on understanding the filtering and monitoring systems and processes in place on College devices and networks
  - 15.6.4. Working with the IT Strategy manager to make sure the appropriate systems and processes are in place.
  - 15.6.5. Working with the Head, IT strategy manager and other staff, as necessary, to address any online safety issues or incidents.
  - 15.6.6. Managing all online safety issues and incidents in line with the school's child protection policy
  - 15.6.7. Ensuring that any online safety incidents are logged (see appendix 6) and dealt with appropriately in line with this policy.



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- 15.6.8. Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the [College Behaviour, Rewards and Sanctions policy](#)
  - 15.6.9. Updating and delivering staff training on online safety
  - 15.6.10. Liaising with other agencies and/or external services if necessary
  - 15.6.11. Providing regular reports on online safety in school to the Head and/or governing board
  - 15.6.12. Undertaking annual risk assessments that consider and reflect the risks children face.
  - 15.6.13. Providing regular safeguarding and child protection updates, including online safety, to all staff, at least annually, in order to continue to provide them with relevant skills and knowledge to safeguard effectively.
- 15.7. The person responsible for IT in school (curriculum and non-curriculum) is directly responsible for, or for ensuring that these actions are completed by the external IT support organisation:
- 15.7.1. Putting in place an appropriate level of security protection procedures, such as filtering and monitoring systems, which are reviewed and updated on a regular basis to assess effectiveness and ensure pupils are kept safe



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from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material.

- 15.7.2. Ensuring that the College's ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly.
  - 15.7.3. Conducting a full security check and monitoring the College's ICT systems regularly
  - 15.7.4. Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- 15.8. All staff, including contractors and agency staff, and volunteers are responsible for:
- 15.8.1. Maintaining an understanding of this section of the policy
  - 15.8.2. Implementing this section of the policy consistently
  - 15.8.3. Agreeing and adhering to the terms on acceptable use of the College's ICT systems and the internet and ensuring that pupils follow the College's terms on acceptable use.
  - 15.8.4. Knowing that the DSL is responsible for the filtering and monitoring systems and processes, and being aware of how to report any incidents of those systems or processes failing.
  - 15.8.5. Following the correct procedures by if they need to bypass the filtering and monitoring systems for educational purposes.
  - 15.8.6. Working with the DSL to ensure that any online safety incidents are logged and dealt with appropriately in line with this section of the policy.
  - 15.8.7. Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the College Behaviour, Rewards and Sanctions policy.
  - 15.8.8. Responding appropriately to all reports and concerns about sexual violence and/or harassment, both online and offline, and maintaining an attitude of 'it could happen here'.
- 15.9. Visitors and members of the community who use the College's ICT systems or internet will be made aware of this policy, when relevant, and are expected to read and follow it. If appropriate, they will be expected to agree to the terms on acceptable use.
- 15.10. The Governors will:
- 15.10.1. make sure all staff undergo online safety training as part of child protection and safeguarding training, and ensure staff understand their expectations, roles and responsibilities around filtering and monitoring.





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- 15.10.2. make sure all staff receive regular online safety updates (via email, e-bulletins and staff meetings), as required and at least annually, to ensure they are continually provided with the relevant skills and knowledge to effectively safeguard children.
- 15.10.3. co-ordinate regular meetings with appropriate staff to discuss online safety, requirements for training, and monitor online safety logs as provided by the designated safeguarding lead (DSL).
- 15.10.4. ensure children are taught how to keep themselves and others safe, including keeping safe online.
- 15.10.5. ensure the College has appropriate filtering and monitoring systems in place on College devices and networks and will regularly review their effectiveness. The board will review the DfE filtering and monitoring standards, and discuss with IT staff and service providers what needs to be done to support the school in meeting those standards, which include:
  - 15.10.5.1. Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
  - 15.10.5.2. Reviewing filtering and monitoring provisions at least annually.
  - 15.10.5.3. Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
  - 15.10.5.4. Having effective monitoring strategies in place that meet their safeguarding needs.
- 15.11. All Governors will:
  - 15.11.1. Ensure they have read and understand this section of the policy.
  - 15.11.2. Agree and adhere to the terms on acceptable use of the College's ICT systems and the internet.
  - 15.11.3. Ensure that online safety is a running and interrelated theme while devising and implementing their whole college approach to safeguarding and related policies and/or procedures.
  - 15.11.4. Ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and some pupils with special educational needs and/or disabilities (SEND). This is because of the importance of recognising that a 'one size fits all' approach



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may not be appropriate for all children in all situations, and a more personalised or contextualised approach may often be more suitable.

15.12. The College has regard to:

- 15.12.1. [The use of social media for on-line radicalisation](#)
- 15.12.2. The UK Safer Internet Centre (<https://www.saferinternet.org.uk/about>)
- 15.12.3. CEOP's Thinkuknow website ([www.thinkuknow.co.uk](http://www.thinkuknow.co.uk))

15.13. Pupils will be taught about online safety as part of the curriculum.

15.14. In **Key Stage 1**, pupils will be taught to:

- 15.14.1. Use technology safely and respectfully, keeping personal information private.
- 15.14.2. Identify where to go for help and support when they have concerns about content or contact on the internet or other online technologies.

15.15. Pupils in **Key Stage 2** will be taught to:

- 15.15.1. Use technology safely, respectfully and responsibly.
- 15.15.2. Recognise acceptable and unacceptable behaviour.
- 15.15.3. Identify a range of ways to report concerns about content and contact.

15.16. By the end of their time in the Prep school, pupils will know:

- 15.16.1. That people sometimes behave differently online, including by pretending to be someone they are not.
- 15.16.2. That the same principles apply to online relationships as to face-to-face relationships, including the importance of respect for others online including when we are anonymous.
- 15.16.3. The rules and principles for keeping safe online, how to recognise risks, harmful content and contact, and how to report them.
- 15.16.4. How to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met.
- 15.16.5. How information and data is shared and used online
- 15.16.6. What sorts of boundaries are appropriate in friendships with peers and others (including in a digital context)
- 15.16.7. How to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know.



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15.17. In **Key Stage 3**, pupils will be taught to:

- 15.17.1. Understand a range of ways to use technology safely, respectfully, responsibly and securely, including protecting their online identity and privacy.
- 15.17.2. Recognise inappropriate content, contact and conduct, and know how to report concerns.

15.18. Pupils in **Key Stage 4** will be taught:

- 15.18.1. To understand how changes in technology affect safety, including new ways to protect their online privacy and identity.
- 15.18.2. How to report a range of concerns

15.19. By the end of their time in the Senior school, pupils will know:

- 15.19.1. Their rights, responsibilities and opportunities online, including that the same expectations of behaviour apply in all contexts, including online.
- 15.19.2. About online risks, including that any material someone provides to another has the potential to be shared online and the difficulty of removing potentially compromising material placed online.
- 15.19.3. Not to provide material to others that they would not want shared further and not to share personal material which is sent to them.
- 15.19.4. What to do and where to get support to report material or manage issues online
- 15.19.5. The impact of viewing harmful content
- 15.19.6. That specifically sexually explicit material (e.g. pornography) presents a distorted picture of sexual behaviours, can damage the way people see



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themselves in relation to others and negatively affect how they behave towards sexual partners.

- 15.19.7. That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail.
  - 15.19.8. How information and data is generated, collected, shared, and used online
  - 15.19.9. How to identify harmful behaviours online (including bullying, abuse, or harassment) and how to report, or find support, if they have been affected by those behaviours
  - 15.19.10. How people can actively communicate and recognise consent from others, including sexual consent, and how and when consent can be withdrawn (in all contexts, including online)
- 15.20. The safe use of social media and the internet will also be covered in other subjects where relevant.
- 15.21. Where necessary, teaching about safeguarding, including online safety, will be adapted for vulnerable children, victims of abuse and some pupils with SEND.
- 15.22. Educating parents about online safety
- 15.22.1. The College will raise parents' awareness of internet safety in letters or other communications home, and in information via our website. This policy will also be shared with parents.
  - 15.22.2. If parents have any queries or concerns in relation to online safety, these should be raised in the first instance with the Head and/or the DSL.
- 15.23. Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.
- 15.23.1. EYFS staff phones are kept secure in their areas and mobile phones may not be on view or in use when EYFS pupils are present.
  - 15.23.2. On arrival at school, staff must switch their phones onto silent for the course of the school day. Whilst staff are permitted to use their phones



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during the school day, they must ensure this use does not prevent them from carrying out their professional duties.

- 15.24. Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- 15.25. Any mobile phones being used as contact phones for trips and visits, must be registered on the trip paperwork and risk assessments.
- 15.26. Staff use of mobile devices must be in accordance with this policy, the [Taking Storing and Using images of children policy](#).
- 15.27. The College will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.
- 15.28. More detail about the College's policies with regards to storing of photos and recordings can be found in the [CCTV Policy](#) and [Data Protection Policy](#)

## **16.Promoting awareness**

- 16.1. The College curriculum and pastoral systems are designed to foster the spiritual, moral, social, and cultural development of all our pupils.
- 16.2. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the College.
  - 16.2.1. We expect all the teaching staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety, well-being, relationships, and sex.
  - 16.2.2. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our behaviour policy and in enforcing our anti-bullying policy.
- 16.3. Our PSHEE programme, which incorporates the new government [guidelines on Relationships and Sex, and Health Education \(RSHE\)](#) equips pupils with the skills they need to stay safe from all forms of abuse such as bullying, homophobic behaviour,



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racism, sexual violence and harassment, sexism and extremism through promoting fundamental British values.

- 16.3.1. Pupils are exposed to a variety outside speakers on these topics which are followed up in PSHEE, for example Alter Ego's 'Going to Extremes,' 'Chelsea's Story' and 'Unacceptable'.
  - 16.3.2. Any discriminatory behaviours are challenged and help and support is given to children about how to treat others with respect.
  - 16.3.3. The PSHEE Curriculum includes material which will help pupils develop realistic attitudes and resilience to deal with the challenges of growing up in the 21st Century.
  - 16.3.4. Time is allocated in PSHEE to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right.
  - 16.3.5. Assemblies, drama and RE lessons along with the wider curriculum are used to promote tolerance and mutual respect and understanding.
- 16.4. All pupils know that there are adults to whom they can turn to if they are worried, including the College Lay Chaplain.
- 16.5. If the College has concerns about a child there is always a recognised requirement for sensitive communication and designated staff members are aware of the need to avoid asking leading questions.
- 16.6. Our support to pupils includes the following:
- 16.6.1. All pupils have access to a telephone helpline enabling them to call for support in private.
  - 16.6.2. A leaflet on the SJCR Wellbeing offer.
  - 16.6.3. Every child in Year 3 and above has a planner or homework diary which contains guidance on where to turn for advice, including confidential help lines and web addresses for external specialists such as ChildLine, Kidscape, Get Connected and the Samaritans. Our classrooms for Year 3 and above display advice on where pupils can seek help.
  - 16.6.4. In the Senior School we operate a peer mentoring scheme whereby Sixth Form students are encouraged to offer advice and support to younger pupils.
  - 16.6.5. In the Senior School we provide leadership training to our prefects/senior pupils which specifically covers child protection issues and the importance of offering support and assistance to younger and to vulnerable pupils.
  - 16.6.6. We provide regular lessons to pupils on e-safety and ensure that all pupils understand and adhere to the College guidelines in this area. This



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includes guidance on educating pupils to stay safe including online protection. For more details on cyber-bullying please refer to the College [Anti-bullying Policy](#). Also see our [Computer Usage Policy](#) which outlines safe usage online.

16.6.7. TooToot anonymous reporting system, which allow a pupil to be identified if they are at risk of harm.

16.7. There are four stages in terms of pastoral levels of support in the College:

16.7.1. Pastoral Stages are overseen by the Assistant Head Wellbeing & Safeguarding alongside the Prep Pastoral Lead, Head of Sixth Form and



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Heads of Year. All work closely with the College Lay Chaplain, Education Mental Health Practitioner and Head of Learning Support.

- 16.7.2. In addition to weekly pastoral meetings, all pupils are reviewed each half term both academically and in an SEMH context.
- 16.7.3. Further information is provided for staff on Pastoral Stages in the Staff Handbook.

### **17. Complaints and concerns about College safeguarding policies**

- 17.1. Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 6).
- 17.2. Other complaints can be made through the [Complaints Policy](#).

### **18. Record keeping**

- 18.1. The College will hold records in line with the privacy [notices for staff, parents and alumni](#), and a separate [notice for students](#).
- 18.2. All safeguarding concerns, discussions, decisions made and the reasons for those decisions must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.
- 18.3. Records will include:
  - 18.3.1. A clear and comprehensive summary of the concern
  - 18.3.2. Details of how the concern was followed up and resolved.
  - 18.3.3. A note of any action taken, decisions reached and the rationale for those decisions, and the outcome.
    - 18.3.3.1. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.
- 18.4. Records and referrals will be kept in a separate child protection file for each child.
- 18.5. Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- 18.6. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.
- 18.7. If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.





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- 18.7.1. To allow the new school/college to have support in place when the child arrives, this should be within:
  - 18.7.1.1. **5 days** for an in-year transfer, or within
  - 18.7.1.2. The **first 5 days** of the start of a new term
- 18.7.2. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.
- 18.8. Safeguarding records are stored electronically on the secure system CPOMS. No safeguarding records are stored on paper.
- 18.9. The DDSLs will have access to electronic records.
- 18.10. Information as to how the College shares information with agencies is outlined in the Parent/Carers Privacy notice.
- 18.11. Appendix 2 sets out the College's policy on record-keeping specifically with respect to recruitment and pre-employment checks.
- 18.12. Appendix 3 sets out the College's policy on record-keeping with respect to allegations of abuse made against staff.

### **19. Training and Continual professional development**

- 19.1. St Joseph's College recognises that regular and appropriate safeguarding CPD is fundamental to good safeguarding practice.
- 19.2. The College believes that high-quality CPD is vital in supporting a strong safeguarding culture.
  - 19.2.1. CPD must be provided by a suitably experienced and qualified person or approved on-line system. CPD must be compliant to the minimum standard set out in, [Keeping Children Safe in Education \(2024\)](#), and have regard to the Teachers Standards.
- 19.3. All safeguarding CPD must be appropriate to role and planned, monitored, and reviewed annually.

#### **19.4. All staff**

- 19.4.1. All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the College's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This



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training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

19.4.2. Training will include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.

19.4.3. Training will have regard to the Teachers' Standards to support the expectation that all teachers:

19.4.3.1. Manage behaviour effectively to ensure a good and safe environment.

19.4.3.2. Have a clear understanding of the needs of all pupils.

19.4.4. Staff are required to complete a full safeguarding course every 3 academic years, with short safeguarding 'refresher' courses each year between.

19.4.4.1. Training includes a review of the following:

19.4.4.1.1. The College Safeguarding Policy

19.4.4.1.2. Keeping Children Safe in Education Part 1 including Annex B

19.4.4.1.3. The Staff Code of Conduct

19.4.4.1.4. The College Behaviour, Rewards and Sanctions Policy

19.4.4.1.5. Mental Health and Wellbeing Policy

19.4.4.1.6. The Prevent Duty

19.4.4.1.7. External Visiting Speakers Policy

19.4.4.1.8. E-Safety Policy

19.4.4.1.9. Anti-bullying policy

19.4.4.1.10. Attendance policy, which includes the College's response to a Child Missing from Education

19.4.5. All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

19.4.6. All training will be integrated, aligned and considered as part of the whole-College safeguarding approach and wider staff training, and curriculum planning.

19.5. Staff will also receive regular safeguarding and child protection updates (through emails, Teams updates and staff meetings) as required, but at least annually.



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19.6. Volunteers will receive appropriate training, if applicable.

## **19.7. The DSL and DDSL(s)**

- 19.7.1. The DSL and DDSL(s) will undertake child protection and safeguarding training at least every 2 years.
- 19.7.2. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- 19.7.3. They will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.
- 19.7.4. The DSL and DDSLs will have access to professional supervision if required. This may be offered to other staff in exceptional circumstances at the discretion of the Head.

## **19.8. Governors**

- 19.8.1. All Governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:
  - 19.8.1.1. Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.
  - 19.8.1.2. Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.
- 19.8.2. As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Head, they receive training in managing allegations for this purpose.
- 19.8.3. It is good practice that at least one person conducting any interview for a post at the College will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, [Keeping Children Safe in Education \(2024\)](#), and will be in line with local safeguarding procedures. See appendix 3 of this policy for more information about the College's safer recruitment procedures.

19.9. All Early Years staff in College who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

## **20. Other visitors to the College site**

20.1. The College [Visiting Speakers Policy](#) sets out the requirements needed before a visit takes place. This includes an online search for suitability, with reference to the Prevent Duty and safeguarding matters. A checklist is completed by the member of staff



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responsible for booking the speaker and when completed, is kept by the Bursar alongside the Single Central Register.

- 20.2. If the College premises is hired to any external provider, the school will gain assurances that the hiring body has appropriate safeguarding procedures in place. Hirers will be required to submit their safeguarding policies and procedures when completing their lettings agreement. This will then be reviewed by the DSL to ensure it is appropriate.

## **21. Monitoring of this policy**

- 21.1. This policy will be reviewed **annually** by the DSL. At every annual review, it will be approved by the Full Governing Board.
- 21.2. In between annual reviews, the DSL or other staff nominated for the purpose by the DSL or Head are authorised to amend this Policy to reflect changes in personnel or procedure. Any such amendments shall be reported to the next meeting of the Full Governing Board.



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## Appendix 1 – Types of abuse

### WHAT IS CHILD ABUSE?

The KCSIE definition of abuse is:

a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. 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 adults or by another child or children.

Abuse, neglect, exploitation, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Abuse is usually divided into 4 categories.

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

**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.

### Physical Indicators

- Injuries that the child cannot explain or explains unconvincingly, or where accidental injury is unlikely.
- Bite marks; cigarette burns
- Sore or damaged eyes
- Bruising resembling hand or fingerprints
- Blunt-instrument marks or iron burns
- Broken limbs (particularly in children under 12)
- Immersion burns/scalds where tide marks have been left.



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## **Behavioural Indicators**

- Child does not want you to ask parents about the injuries.
- Fear of parent on approach, or fear of going home
- Covering limbs even in hot weather or reluctance to change
- Flinches when touched or approached.
- Depression or mood swings that are out of character.

## **Parental Indicators**

- Inconsistent explanations
- Several different explanations
- Delay in seeking treatment

**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 as far 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.

## **Physical Indicators**

- A failure to grow or thrive
- Sudden speech disorders
- Delayed development – physical or emotional
- Stress related illnesses or Post Traumatic Stress Disorder (PTSD)

## **Behavioural Indicators**

- Seeing themselves as unworthy of love and affection
- Excessive lack of confidence (not just shyness) or persistent low self esteem
- Poor peer relationships
- Compulsive nervous behaviour
- Self-harming behaviours
- Wetting/soiling
- Excessive need for approval, attention, affection
- Forced marriage
- Abnormal attachment between child and parent

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual



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activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education, and all staff should be aware of it and of their college's policy and procedures for dealing with it.

## Physical Indicators

- Pain, itching, bruising or bleeding to genital or anal areas
- Sexually transmitted disease or recurrent genital discharge or urinary tract infections without apparent cause
- Stomach pains or discomfort when child is walking or sitting

## Behavioural Indicators

- Sudden or unexplained changes in behaviour
- Nightmares or bedwetting
- Self-harming or eating disorders
- Sexual drawings, play or promiscuous language or behaviour (inappropriate to age and understanding)
- Reluctance to change clothes for sports etc.
- Sexual bullying of other children

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

Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers);
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.



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## Appendix 2 – Specific safeguarding issues

### Mental health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

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

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education and that they have read the College [Mental Health and Wellbeing Policy](#). If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the safeguarding policy, and speaking to the designated safeguarding lead or a deputy.

The College Senior Mental Health Lead is the Assistant Head (Wellbeing & Safeguarding)

### Child exploitation (CE)

Children can be vulnerable to different types of exploitation.

Child sexual exploitation (CSE) is a form of sexual abuse and consent cannot be given. It involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities.

Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber bullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. It is also important to note that the experiences of boys and girls may differ in CSE situations.

CSE can also include so-called 'sextortion,' which is a recently defined criminal act where victims (often teenage boys) are tricked into sending nude images and then blackmailed. Perpetrators will generally pose as young, attractive girls online and spark up conversations with the aim of finding out personal details before turning the conversation into that of a sexual nature. They then ask them to send nude images or to appear naked on a webcam. Once this happens, messages are then sent telling the victim they have the images saved and will publish them online, send them to their school or their families, unless payment is received.





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In many cases payment is made through online gaming gift cards, or in some more extreme cases this is used to ensnare victims into criminal acts. In some cases, it goes from initial contact to blackmail within an hour. Perpetrators are most often affiliated to criminal gangs based abroad.

The [Internet Watch Foundation](#) provides excellent advice on the subject, which includes the potential changes in behaviour seen in victims of sextortion:

1. Emotional distress: The child may display signs of increased anxiety, fear, or mood swings. They may appear more withdrawn, depressed, or easily agitated.
2. Social withdrawal: The child might start avoiding social interactions or spending less time with friends and family. They may become isolated and reluctant to participate in activities they used to enjoy.
3. Change in online behaviour: If a child is being sexually extorted, they may exhibit specific alterations in their online activities, such as spending excessive amounts of time online, becoming secretive about their online interactions, or suddenly avoiding or deleting social media accounts.
4. Unusual behaviour with money, gift vouchers, online currencies etc.: The child is spending more money than usual or has less money than you would expect. They may steal money from you or other family members.
5. Unusual secrecy: The child may become unusually secretive about their personal life, activities, or online interactions. They might express reluctance or defensiveness when questioned about their online behaviour or communication.
6. Sudden drop in academic performance: Sextortion can have a significant impact on a child's emotional wellbeing, which may lead to a decline in their academic performance. They may struggle with concentration, lose interest in schoolwork, or show signs of distress during school hours.
7. Change in attitude to school: They may see school as their safe place and enjoy the break from devices if the perpetrator/extortionist is outside the school community.
8. Sleep disturbances: Sextortion can cause significant stress and anxiety, leading to changes in sleep patterns. The child may experience difficulties falling asleep, frequent nightmares, or increased night-time awakenings.
9. Avoidance of electronic devices: If a child is being sexually extorted, they might display an unusual aversion to using electronic devices or express discomfort when receiving messages or calls. They may try to limit their online presence or avoid using specific apps or platforms altogether.
10. Self-harm or suicidal ideation: The child might exhibit signs of self-harm, suicidal thoughts or express feelings of hopelessness. These signs should be taken extremely seriously, and immediate professional help should be sought.

It is important to remember that these behavioural changes could indicate various issues, not just sextortion. If you notice any significant and persistent changes in a child's behaviour, it is crucial to approach the situation with sensitivity, open communication and seek professional help if necessary.

Staff are aware of the signs and symptoms of CSE. Pupils are also taught to recognise the signs of CSE in PSHEE lessons. Parents are invited to attend Information evenings on the subject of CSE.



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Child Criminal Exploitation (CCE) is a form of abuse, and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

CCE can include children being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket, or to threaten other young people.

## **County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line."

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging,' where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

## **Children missing or absent from education (CME)**

The welfare of all of our children at St Joseph's College is our paramount responsibility. A child going missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect, including sexual exploitation and so called 'honour based' violence. A child may be considered missing from education where there are unexplainable and/or persistent absences from education.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:



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- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

Every adult who works at the school has been trained to appreciate that he or she has a key responsibility for helping to keep all of the children safe at all times. Every member of our staff has read Part 1 of Keeping Children Safe in Education and Annex B. Our staffing ratios are generous and are deliberately designed to ensure that every child is supervised the whole time that he or she is in our care.

The College will monitor all pupil absences from school and promptly address concerns about irregular attendance with the parent/carer. Two emergency contact numbers will be held for each pupil. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Where a child has been absent for 7 consecutive days due to illness, no further days of absence will be authorised without medical evidence from a medical professional e.g. a 'sick note' from the child's GP.

The College will inform the local authorities of the details of pupils who fail to attend school regularly or have missed ten school days or more without permission. The school will contact the local authority when children join or leave the school at non-standard transition times. When pupils leave, the College will tell the LA to which school they are moving and when they will start, this is very important if they are changing to home-schooling.

## **Serious Violent Crime**

All staff must be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in well-being
- signs of assault or unexplained injuries
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.



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If staff have any concerns that a child may be involved with serious violent crime they must report these to the DSL.

## **Substance Abuse**

All staff must have an awareness of substance abuse linked to the likes of drug taking and alcohol abuse. Further guidance is included in our [Substance Misuse Policy](#).

## **Honour-based abuse (HBA) including Female Genital Mutilation (FGM)**

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and must be handled and escalated as such.

Since February 2023, any form of marriage under the age of 18 is illegal in the UK and any actions towards this are encompassed under the term 'forced marriage.'

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting, or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)



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- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to consider the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

If in any doubts staff must speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

If staff have concerns that FGM has taken place, as well as reporting this to the police, they must also activate local safeguarding procedures using existing and national and local protocols. Unless the teacher has a good reason not to, they must still consider and discuss any case of FGM with the DSL and involve children's social care as appropriate. It will be rare for teachers to see visual evidence, and they must not be examining pupils.

Police contact details for reporting FGM:

Thames Valley Police: 101 or 999

NSPCC FGM Help line 0880 028 3550

[fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)



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

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- 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
- 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)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 8 of this policy, as appropriate. In particular, section 7.8 sets out more detail about The College's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

The College Anti-Bullying Policy, Behaviour, Rewards and Sanctions Policy and the pupil voice Equality, Diversity and Inclusion Committee are in place to minimise the risk of child-on-child abuse. Such abuse must always be taken as seriously as abuse perpetrated by an adult.



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Whenever a child may have harmed another, all agencies must be aware of their responsibilities to both children and multi-agency management of both cases must reflect this. Agencies must also be alert to the possibility that a child or young person who has harmed another may well also be a victim. However, the interests of the identified victim must always be paramount consideration and professionals must also be alerted to the fact that there is likely to be a risk to children other than the current victim.

Staff working with children need clear guidance and training to identify the difference between appropriate and exploitative peer relationships. Staff must not dismiss some abusive sexual behaviour as 'normal' between young people and must not develop high thresholds before taking action.

Work with children and young people who abuse others, including those who sexually abuse/offend, must recognise that such children are likely to have considerable needs themselves and that they may pose a significant risk of harm to other children. Evidence suggests that children who abuse others may have suffered considerable disruption in their lives, been exposed to violence within the family, may have witnessed or been subject to physical or sexual abuse, have problems in their educational development and may have committed other offences. Such children and young people are likely to be children in need and some will, in addition, be suffering, or at risk of suffering, significant harm and may themselves be in need of protection.

Children and young people who abuse other children must be held responsible for their abusive behaviour, while being identified and responded to in a way that meets their needs as well as protecting others. Staff must be aware that gender issues can be prevalent when dealing with child-on-child abuse, this could, for example include a pupil being sexually touched/assaulted.

When dealing with cases of child-on-child abuse, both victims and perpetrators will be supported.

### **Physical Indicators**

- Physical injuries
- Compromised sexual health
- Poor mental health and emotional wellbeing

### **Behavioural Indicators**

- Going missing/running away
- Drug and alcohol abuse
- Committing criminal offences
- Acting disengaged from school

### **Domestic abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial,



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psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims. Any child who sees, hears, or experiences the effects of domestic abuse is also a victim.

In the senior school we recognise older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development, and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day through [Operation Encompass](#)

The DSL will provide support according to the child's needs and update records about their circumstances.

## Preventing radicalisation

- **Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Terrorism** is an action that:
  - Endangers or causes serious violence to a person/people;
  - Causes serious damage to property; or
  - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Schools have a duty to prevent children from being drawn into terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on radicalisation into terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.





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There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

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

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.



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Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual or gender questioning children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 8 of this policy, as appropriate. In particular, section 8.8 set out more detail about our school's approach to this type of abuse.

### **Cyberbullying**

#### **Definition**

Cyber-bullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of one person or group by another person or group, where the relationship involves an imbalance of power. (See also the College behaviour policy.)

#### **Preventing and addressing cyber-bullying**

To help prevent cyber-bullying, we will ensure that pupils understand what it is and what to do if they become aware of it happening to them or others. We will ensure that pupils know how



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they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim.

The College will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be.

Teaching staff are also encouraged to find opportunities to use aspects of the curriculum to cover cyber-bullying. This includes PSHEE and other subjects where appropriate.

All staff, governors and volunteers training on cyber-bullying, its impact and ways to support pupils, as part of safeguarding training

In relation to a specific incident of cyber-bullying, the College will follow the processes set out in the College behaviour policy. Where illegal, inappropriate or harmful material has been spread among pupils, the school will use all reasonable endeavours to ensure the incident is contained.

The DSL will consider whether the incident should be reported to the police if it involves illegal material, and will work with external services if it is deemed necessary to do so.

## **Examining electronic devices**

College staff have the specific power under the Education and Inspections Act 2006 (which has been increased by the Education Act 2011) to search for and, if necessary, delete inappropriate images or files on pupils' electronic devices, including mobile phones, iPads and other tablet devices, where they believe there is a 'good reason' to do so.

When deciding whether there is a good reason to examine or erase data or files on an electronic device, staff must reasonably suspect that the data or file in question has been, or could be, used to:

- Cause harm, and/or
- Disrupt teaching, and/or
- Break any of the school rules

If inappropriate material is found on the device, it is up to the staff member in conjunction with the DSL or other member of the senior leadership team to decide whether they should:

- Delete that material, or
- Retain it as evidence (of a criminal offence or a breach of school discipline), and/or
- Report it to the police\*

\* Staff may also confiscate devices for evidence to hand to the police, if a pupil discloses that they are being abused and that this abuse includes an online element.

Any searching of pupils will be carried out in line with:

- The DfE's latest guidance on [screening, searching and confiscation](#)
- UKCIS guidance on [sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

Any complaints about searching for or deleting inappropriate images or files on pupils' electronic devices will be dealt with through the College complaints procedure.



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## Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Staff must complete a Visiting Speaker form and give this to the DSL prior to the visiting speaker attending the College. Further information can be found in the [Visiting speakers policy](#).

## Non-collection of children

Late Collection of a Child In the event of late or non-collection of a child by an authorised adult the main concern of the staff will be for the safety and welfare of the child.

The College will put into practice agreed procedures in line with its [Uncollected child policy](#) to ensure that the child receives a high standard of care in order to cause as little distress as possible.

An authorised adult will be a parent, friend or relative that has been appointed by the child's parent or guardian.

Parents of all children are asked to provide specific information for school records. We will request a minimum of two contact for each child and where possible, at least one residing at a different address. It is important that if there are any changes, parents inform the school so that records can be updated, and the most current details are held. Information about any person who does not have legal access to the child must also be given.

If parents are aware that they will not be at home or in their usual place of work, they should inform the school of how they can be contacted.

If parents or the persons normally authorised to collect the child are not able to collect the child, they must provide the College with written details of the name, address and telephone number of the person who will be collecting their child.



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The College will agree with parents how to verify the identity of the person who is to collect their child. If parents cannot collect their child as planned, they must inform the College as soon as possible.

In the event that a child is not collected from school by an Authorised Adult within one hour of the end of the school day (6.00pm for Seniors, 3.40pm for Prep or 6.00pm if attending the extended day programme) and the College has exhausted all efforts in contacting the parents/carers and emergency contact numbers, the College is legally required to contact Children's Social Care, for advice and guidance.

This will be recorded on the students safeguarding file and Children's Social Care will be made aware.

### **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will contact the parents/carers and emergency contact numbers without delay. If there is no response from these efforts and it is assumed the child is no longer on site, the College will contact the Police.

To ensure students safety, should the College have no received communication from a parent/carer that the child will not be in school on a given day, the College will enact its First Response to make parents aware that the child has not arrived to school. If the parent/carer believes the child is at school, once assumed the child is not on site, the College will contact the Police. Further information can be found in the College [Pupil Missing from Site Policy](#).

### **Homelessness**

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



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## **Appendix 3: Safer recruitment practices**

All staff in the College have read both the latest update to KCSIE Part 1 and Annex B. A declaration form confirming this is signed by all staff working in the College and these are retained by the HR Coordinator. All staff must complete online training in safeguarding annually.

St Joseph's College follows the Government's recommendations for the safer recruitment and employment of staff who work with children and acts at all times in compliance with the Independent School Standards Regulations. The Head, the Bursar, and members of SLT have completed the training for the safer recruitment process.

In line with Part 3 of the DfE's guidance 'Keeping Children Safe in Education' (KCSIE 2024), the governing body prevent people who pose a risk of harm from working with pupils by adhering to statutory responsibilities to check all staff who work with children, taking proportionate decisions on whether to ask for any checks beyond the minimum required, and ensuring volunteers are appropriately supervised.

The College works with external agencies where appropriate including inter-agency working on the part of the DSL and attendance at strategy meetings.

As part of carrying out safe recruitment procedures under KCSIE, members of the teaching and non-teaching staff at the College including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work. For most appointments, an enhanced DBS (Disclosure and Barring Service) check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the College may undertake an online update check through the DBS Update Service.

Further to the DBS check, anyone appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching by order of the Secretary of State. Those undertaking management posts will be subject to Prohibition from Management of Independent Schools checks.

In addition, as part of the shortlisting process the College may carry out an online search on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the College might want to explore with the applicant at interview.

All governors, volunteers and contractors working regularly during term-time (such as contract catering staff) are also subject to the statutory DBS checks. Confirmation is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils at school or on another site.

Should the College develop concerns about an existing staff member's suitability to work with children; it will carry out all relevant checks as if the individual were a new member of staff.

Please also refer to the College [Recruitment Policy and Safer Recruitment policies](#) for further details.



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## **INDUCTION OF NEW STAFF, GOVERNORS, AND VOLUNTEERS IN SAFEGUARDING**

Every new member of the teaching and non-teaching staff, including new peripatetic musicians and sports coaches, and trustees, governors and volunteers are required to attend a training session on safeguarding. These sessions are organised by our Designated Safeguarding Lead (DSL) and these will be held prior to any interaction with children. Similar training is offered to all governors and to the parents who help with activities that bring them into contact with children.

The DSL is responsible for ensuring that Thomas Franks, the firm that runs our catering, and TK Travel, the firm that runs our transport to and from the College, receive the school's policy on Safeguarding and the Staff Code of Conduct and are briefed annually on the safeguarding procedures within the College and are given the opportunity to ask questions and raise issues.

The only adults who work or visit the school who are exempted from this requirement are:

- Night-time cleaners whose hours of work mean that they do not have contact with pupils.
- Occasional visitors, including occasional lecturers and contractors, who sign in and are given security badges by our Receptionists, who draw their attention to the Fire Safety and Safeguarding guidance on the rear of these badges and who are subsequently escorted throughout their visit.
- Contractors working on a designated site that is physically separated from the rest of the school who are required to sign in and out at their site office and to wear security badges at all times.

Child protection is our top priority; every member of staff needs to be confident that they understand their role in:

- Keeping children safe
- Promoting the welfare of pupils
- Promoting equal opportunities and inclusion
- Preventing bullying and harassment

Everyone is required to take part in the training no matter what their previous background or level of expertise. Refresher training for all staff is held regularly in line with advice from the Berkshire West Safeguarding Children Partnership.

Our induction training will tell you about:

- Our pupil welfare systems including the roles of the following:
  - the liaison governor for child protection issues and chair of the Safeguarding Committee
  - the Senior Leadership Team and the DSL
  - weekly pastoral meetings including the Assistant Head Wellbeing & Safeguarding, Heads of Year/Section and Prep Pastoral Lead
  - the regular monitoring arrangements by the Head of Year and Heads of Section
  - the role of the College Chaplain and Education Mental Health Practitioner
  - pastoral support stages
  - the prefect system and the training in leadership given to senior pupils
  - the role of the school council and pupil voice committees
  - our partnerships with parents and guardians



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- filtering and monitoring processes within the College and the individual's role in promoting online safety
- CPOMS Pastoral and Safeguarding Reporting and Management System
- SchoolBase registration and system for recording rewards and sanctions
- TooToot anonymous reporting system for pupils

We will describe our arrangements for providing additional support for pupils with special educational needs and disabilities (SEND).

### ➤ The Legal Framework for our Child Protection and Anti-Bullying Policies

We describe this briefly and our policies cover:

- Anti-bullying
- Behaviour
- Disability, Special Education Needs and Learning Difficulties
- Equal Opportunities
- Educational Visits
- Safer recruitment of staff, covering our procedures in recruiting, checking that our staff are suitable and qualified for their roles, and that the statutory child protection checks have been carried out.
- Arrangements for checking governors, volunteers, contractors' staff, volunteers, and adult members of the households of staff accommodated on-site.
- The safe supervision of visitors
- Keeping Children Safe in Education
- Working Together to Safeguard Children
- Obligations under The Childcare (Disqualification) Regulations 2018

Teaching staff have a particular responsibility for supervising pupils and ensuring that they behave with consideration and good manners at all times; but all staff need to be made aware of the school's policies in these areas. All staff are reminded of their important role in building positive relationships, identifying risks and keeping everyone safe. We cover internet and technological bullying and the potential risks (as well as benefits) of the internet and social networking sites. We train staff in being alert to the signs of bullying or children at risk of radicalisation. Training includes awareness to equip staff to identify children at risk of being drawn into terrorism.

### ➤ Understanding Challenging Behaviour

We draw upon national guidance relating to the safeguarding and protection of children, the signs of abuse, and the duties of staff, as well as the role of specialist agencies. We explain our expectations of how they must respond in a difficult situation and why they cannot promise confidentiality to a pupil.

### ➤ The School's Policies on Safeguarding

All new staff as part of their induction will be expected to become familiar with our policies on:

- Safeguarding
- Staff Code of Conduct
- Missing Child
- Behaviour, Rewards and Sanctions





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- Mental Health and Wellbeing
- Whistle-blowing
- E-Safety
- Mobile Devices

Copies of these documents can be found on our website. We also draw upon official guidance, such as 'Keeping Children Safe in Education'. **Please note that all staff and volunteers will be required to have read Part 1 of Keeping Children Safe in Education and Annex B, and to have completed the Educare on-line training in Safeguarding and Child Protection.**

➤ Visitors and Site Security

This covers the need for visitors to be signed in at Reception and to be escorted about the school.

➤ Effective Record Keeping

Why effective record keeping matters.

➤ Refresher Training

The session concludes with reminding staff that refresher training is given annually and by inviting all staff, Governors and volunteers to provide a certificate to show that they have completed the training session.



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## Appendix 4: Low Level Concern Policy

(To be read alongside the Staff Code of Conduct)

### Introduction

At St Joseph's College, we take safeguarding very seriously. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the College, including the Staff Code of Conduct. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

### Summary

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. A member of staff who has a concern about another member of staff should inform the DSL and the Head (or in their absence the Chair of Governors) about their concern using a [Low-Level Record of Concern Form](#). If they cannot be contacted, the Chair of Governors should be contacted instead. If the concern is about the DSL this should be reported to the Head only. If the concern is about the Head this must be reported to the Chair of Governors. Concerns about supply staff and contractors should be reported to the agency/business so potential patterns of inappropriate behaviour can be identified.

When a concern has been raised by a third party, the Head, with the support of the DSL, should:

- collect as much evidence as possible by speaking where possible with that person who raised the concern, to the individual involved and to any witnesses
- complete a regular review

If a pattern is identified, the course of action taken might be internal disciplinary procedures or referring to LADO. The College should consider whether wider cultural issues enabled the behaviour to occur, and whether policies need revision or training is needed to prevent this happening again. Rationale for all decisions taken must be recorded.

### Keeping Children Safe in Education September 2024

The following is taken from Keeping Children Safe in Education September 2024:

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

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

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

- *being over friendly with children*
- *having favourites*
- *taking photographs of children on their mobile phone, contrary to school policy*
- *engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or*
- *humiliating children.*

*434. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.*



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

*436. It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.*



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## Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

### Allegation

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

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

### Appropriate Conduct

- Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.

### Low-Level Concern

Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

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

## Storing and use of Low-Level Concerns and follow-up information

Low Level Concern forms and follow-up information will be stored securely within the schools safeguarding systems, with access only by the Head and Senior Leadership Team. This will be stored in accordance with the school's GDPR and data protection policies.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Head or those aware in the senior leadership team.

Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave St Joseph's College, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept. Consideration will be given to:

- whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or





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## Appendix 5: The role of the Designated Safeguarding Lead and Deputies

The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). 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

Any deputies are 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 and Holiday Club the designated safeguarding lead (or a deputy) should always be available (during College hours) for staff in the College to discuss any safeguarding concerns. Generally, the safeguarding lead (or deputy) is expected to be available in person, however, in exceptional circumstances availability via phone and or Microsoft Teams or other such media is acceptable, in their physical absence a member of SLT will be available on site.

### 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 Head inform them of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations; including being aware of the requirement for children to have an appropriate adult while being questioned or detained by the police (usually as parent, guardian or social worker)
- 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 team, Tech Support, and special educational needs co-ordinators, on matters of safety and safeguarding and welfare (including online and digital safety and the filtering and monitoring processes of the College) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically



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- liaise with 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 Head 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 the College.

This includes:

- ensuring that the 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
- supporting 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 in CPOMS.

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 rationale for those decisions, and the outcome.
- This should include reasons why referrals were or were not made to external services such as LA children's services or the Prevent program.

They should ensure the file is only accessed by those who need to see it.

Where children leave the 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.





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## **Raising Awareness**

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the College Safeguarding Policy and procedures, especially new and part-time staff;
- ensure the Safeguarding Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work the governing body regarding this
- ensure the Safeguarding Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the College in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and College 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 early help assessment process 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 College with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to 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 the 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



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- 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 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 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 designated safeguarding lead should be equipped to:

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



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## **Appendix 6: Procedures for dealing with disclosures/allegations of abuse**

Allegations of abuse may be made against a member of staff, a contractor, a volunteer, a governor, a pupil, parent or other person connected to the College.

If a disclosure is being made against a member of staff/volunteer, this must be made to the Head or in their absence, the Chair of Governors/Safeguarding Governor.

Where a disclosure is made against supply and agency staff, the agency will be kept full informed and aware of the situation.

Allegations of abuse against teachers and other staff will be dealt with according to the statutory guidance set out in part four of KCSIE.

If a member of staff is made aware of any allegation of abuse, or if knowledge of possible abuse comes to his/her attention it is his/her duty to listen to the child, to provide re-assurance and to record the child's statements, but not to probe or put words into the child's mouth.

On hearing an allegation of abuse or complaint about abuse directly from a child, a member of staff must limit questioning to the minimum necessary for clarification. Leading questions must be avoided. No inappropriate guarantees of confidentiality must be given; rather the child must be told that the matter will be referred in confidence to the appropriate people in positions of responsibility. The member of staff must make and submit an accurate written record and inform the Head and the DSL immediately so that appropriate agencies can be informed within 24 hours and the matter resolved without delay. In a situation where there is a conflict of interest in reporting the matter to the Head, this should be reported directly to the LADO.

If a member of staff is the subject of an allegation or suspicion, they should not be informed of this at this stage, until advice is sought from the relevant agencies. Doing so may put a child or young person at further risk and/or jeopardise any subsequent investigations.

The Head and/or DSL will ensure a follow up meeting takes place with the member of staff who received the initial disclosure and support put in place if required.

Where there is a safeguarding concern the College will ensure the child's wishes are taken into account when determining what action to take and what services to provide.

The Head/DSL will contact the Local Authority Designated Officer (LADO) for advice or direction and will inform ISI if appropriate. In relation to our EYFS setting, the College will inform Ofsted as soon as is reasonably practical, in any event within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere) or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations.

Should the allegation of abuse concern the DSL, the member of staff must inform the Head. Allegations against the Head or Governor must be reported directly to the Chair of Governors without the Head being informed first. Their contact details can be obtained from the Senior



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School reception: 0118 966 1000 or the Head's PA. It will be the Chair's responsibility to contact the LADO.

The Head, DSL, Chair of Governors or the Safeguarding Governor will refer all allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering, or is likely to suffer significant harm, to the local authority designated officer (LADO) within 24 hours. In the case of serious harm, the police will be informed from the outset of any allegation.

Borderline cases will be discussed with the LADO without identifying individuals in the first instance and following discussions the LADO will judge whether an allegation or concern meets the relevant threshold. The LADO and the Head/DSL (or the Chair of Governors/Safeguarding Governor) will decide in the circumstances what further steps must be taken. This could involve informing parents and calling the police.

If the allegation concerns a member of staff, a volunteer, or another pupil he/she would normally be informed as soon as possible after the result of any initial investigation authorised or conducted by the LADO is known. Advice will always be sought from the LADO first, however. The College will normally appoint a member of staff to keep the person informed of the likely course of action and the progress of the case.

The outcome of an investigation of an allegation will record whether:

- it is substantiated (there is sufficient evidence to prove the allegation)
- unsubstantiated (there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence)
- malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive).

If it is established that the allegation is malicious, no details of the allegation will be retained on the individual's personnel records. However, for all other allegations, the following information will be kept on the file of the person accused:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- a note of any action taken, and decisions reached and the outcome as categorised above;
- a copy provided to the person concerned, where agreed by children's social care or the police; and,
- a declaration on whether the information will be referred to in any future reference.

If the LADO or any of the statutory child protection authorities decide to take the case further, any staff member concerned may be suspended if this is felt appropriate. The reasons and justification for suspension will be recorded and the staff member informed of them. In the case of staff, the matter will be dealt with in accordance with the Disciplinary Procedures. Where a member of staff, governor or other person connected to the College resides on site and is suspended pending an investigation of a child protection nature, suitable arrangements must be put in place for alternative accommodation away from children.



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In the case of child-on-child abuse which the College has reported to children's social care and which the statutory child protection authority decides to investigate further, the matter will be dealt with under the College Behaviour, Rewards and Sanctions Policy after discussion with the local authority.

During the course of the investigation the College in consultation with the LADO will decide what information must be given to parents, staff and other pupils and how press enquiries are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 and in Keeping Children Safe in Education relating to reporting restrictions identifying teachers who are the subject of allegations from pupils.

Any pupils who are involved will receive appropriate care and support from the College.

If a referral to an external agency is not made, we would then follow the procedures from our [Anti-Bullying Policy](#).

### **Low Level Concerns**

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. A member of staff who has a concern about another member of staff should inform the Head or DSL about their concern using a Low-Level Record of Concern Form. If the concern is about the Head this must be reported to the Chair of Governors.

The Low Level Concerns Policy (Appendix 4) must be read alongside the College Safeguarding Policy and Staff Code of Conduct.

### **External reporting**

We follow the Disclosure and Barring Service (DBS) guidance and procedures regarding referrals and barring decisions and the Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. Separate to involvement of the LADO, schools have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) at the College, or would have been removed had they not left.

St Joseph's College will make such a referral as soon as possible after the resignation or dismissal of any individual (whether employed, contracted, a volunteer or a student) whose services are no longer used because he or she is considered unsuitable to work with children. This includes dismissal, non-renewal of a fixed term contract, no longer using supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above.

If an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the College will make a referral to the Department for Education and the Teaching Regulation Agency (TRA) as appropriate and a prohibition order may be required (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence). The



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College will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

Where the College ceases to use the services of a teacher because of serious misconduct, or would have dismissed them had they not resigned, it will consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002. The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty on teachers along with social workers and healthcare professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Unless the teacher has a good reason not to, they must still consider and discuss any such case with the school's designated safeguarding lead and involve children's social care as appropriate.



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## Appendix 7: External agencies contact information

**The College points of contact for children who are the focus of concern are as follows:**

Reading website for child protection:

[Early help assessment - Brighter Futures For Children](#)

[Children's Single Point of Access | Reading Services Guide](#)

[Report concerns about a child - Brighter Futures For Children](#)

Wokingham:

[Care and support for children and families - Wokingham Borough Council](#)

[Report a concern about a child - Wokingham Borough Council](#)

West Berkshire:

[Children and Family Services - West Berkshire Council](#)

[West Berkshire Council - Concerned about a Child? - Information](#)

Bracknell:

[Report child abuse or concern about a child | Bracknell Forest Council \(bracknell-forest.gov.uk\)](#)

Oxfordshire:

[Multi-Agency Safeguarding Hub \(MASH\) | Oxfordshire County Council](#)

[Children's social care request for service form | Oxfordshire County Council](#)

Children's Social Care (Local Authority):

- Bracknell: 01344 351582
- Oxfordshire: 0845 050 7666
- Reading (Children's Single Point of Access): 0118 937 3641
- Slough: 01753 690898 / 875591
- West Berkshire: 01635 503090
- Windsor and Maidenhead: 01628 683150
- Wokingham: 0118 908 8002



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Outside these hours – between 5.00 p.m. and 9.00 a.m. and on weekends and Bank Holidays – the Emergency Duty Team (which covers the whole of Berkshire) can be contacted on 01344 786543

Police Emergency – 999

Police Non-Emergency – 101

## **OFSTED Safeguarding Children**

08456 404046 (Monday to Friday from 8am to 6pm)

[Whistleblowing@ofsted.gov.uk](mailto:Whistleblowing@ofsted.gov.uk)

## **The College points of contact for children who are in need of help are as follows:**

Reading Early Help Assessment/Advice team [www.reading.gov.uk/earlyhelp](http://www.reading.gov.uk/earlyhelp)

Reading Children's Action Team: 0118 937 6545

Reading Services Guide:

<http://servicesguide.reading.gov.uk/kb5/reading/directory/home.page>

West Berkshire Help for Families Team: 01635 503090

<http://info.westberks.gov.uk/index.aspx?articleid=30030>

Wokingham CAF Team: 0118 974 6220

[www.wokingham.gov.uk/children-and-families/family-support/early-intervention-and-common-assessment-framework/](http://www.wokingham.gov.uk/children-and-families/family-support/early-intervention-and-common-assessment-framework/)

CAMHS Berkshire Health Care website: [www.berkshirehealthcare.nhs.uk/camhs/](http://www.berkshirehealthcare.nhs.uk/camhs/)

Children's Services Directory:

Reading: [www.berkshirehealthcare.nhs.uk/CAMHS/documents/reading-childrens-services-directory.pdf](http://www.berkshirehealthcare.nhs.uk/CAMHS/documents/reading-childrens-services-directory.pdf)

West Berkshire: [www.berkshirehealthcare.nhs.uk/camhs/documents/west-berks-childrens-services-directory.pdf](http://www.berkshirehealthcare.nhs.uk/camhs/documents/west-berks-childrens-services-directory.pdf)

Wokingham: [www.berkshirehealthcare.nhs.uk/camhs/documents/wokingham-childrens-services-directory.pdf](http://www.berkshirehealthcare.nhs.uk/camhs/documents/wokingham-childrens-services-directory.pdf)

## **Extremism**

Department for Education dedicated helpline for staff and governors: 020 7340 7264 and [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

## **Critical Incident Support Service**

CISS are notified by hospitals and/or Children's Services about critical incidents, and then contact schools to offer support such as major incidents/death of a pupil at the school.

Deborah Hunter

Principal Educational Psychologist (PEP)





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0118 9376545  
deborah.hunter@reading.gov.uk

***Other useful contacts***

**Disclosure and Barring Service  
PO Box 181, Darlington, DL1 9FA  
Tel: 01325 953795**



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## **Appendix 8: Arrangements for Safeguarding during prolonged closure of the College**

### **Context**

During times of emergency, whether local or national, the College may receive instruction to close for a significant period of time. The purpose of this appendix is to provide guidance for all stakeholders should a significant period of closure take place.

### **General opening information**

During a period of significant closure, the College Leadership Team will take advice and instruction from the government, Public Health England, and other relevant agencies (depending on the context of the closure). The College will always aim to remain open for as many students as possible and will reopen once we have received permission from the relevant authorities and the Senior Leadership Team and deemed it is safe to do so. During periods of significant closure, the College will remain open for those students for whom we have instruction; this may include, but not be limited to, children of 'key workers,' vulnerable children, or other categories named at the time.

The College will continue to have regard to the statutory safeguarding guidance [Keeping Children Safe in Education \(2024\)](#).

We will take advice and work with the local safeguarding partners.

Should the government publish guidance for Education and childcare settings in a period of national emergency, the College will follow the advice set out and update this document.

### **Vulnerable children**

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with education, health and care (EHC) plans.

Those who have a social worker include children who have a Child Protection Plan and those who are looked after by the Local Authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in Section 17 of the Children Act 1989.

In the event of a significant period of closure, those with an EHC plan will be risk-assessed in consultation with the Local Authority and parents, to decide whether they need to continue to be offered a school or college place in order to meet their needs, or whether they can safely have their needs met at home. This could include, if necessary, carers, therapists or clinicians visiting the home to provide any essential services. Many children and young people with EHC plans can safely remain at home.

Senior leaders, especially the Designated Safeguarding Lead (and deputies) know who our most vulnerable children are. They have the flexibility to offer a place to those on the edge of receiving children's social care support where appropriate.

The College will continue to work with and support children's social workers to help protect vulnerable children. This includes working with and supporting children's social workers and



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the local authority virtual school head (VSH) for looked-after and previously looked-after children. The lead person for this will be the Assistant Head (Wellbeing & Safeguarding).

The College will follow guidance as set by the government for attendance to the school site.

The College will encourage our vulnerable children and young people to attend school whether in person or remotely.

### **Attendance monitoring**

In the case of a significant period of closure the College and social workers will agree with parents/guardians whether children in need should be attending school – The College will then follow up on any pupil that they were expecting to attend, who does not. The College will also follow up with any parent or carer who has arranged care for their child and the child subsequently does not attend.

To support the above, the College will, when communicating with parents/guardians, confirm emergency contact numbers are correct and ask for any additional /carers and carers emergency contact numbers where they are available.

In all circumstances where a vulnerable child does not take up their place at school, or discontinues, the College will notify their social worker.

### **Designated Safeguarding Lead**

The optimal scenario is to have a trained DSL (or deputy) available on site. Where this is not the case a trained DSL (or deputy) will be available to be contacted via phone or online video - for example when working from home.

Where a trained DSL (or deputy) is not on site, in addition to the above, a senior leader will assume responsibility for co-ordinating safeguarding on site.

This might include updating and managing access to child protection online management system, CPOMS and liaising with the offsite DSL (or deputy) and as required liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the school or college.

It is important that all College staff and volunteers have access to a trained DSL (or deputy). The DSL should be contacted in the first instance on the telephone number listed in the key contacts.

The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely.

### **Reporting a concern**



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Where staff have a concern about a child, they should continue to follow the process outlined in the school Safeguarding Policy and contact the DSL or Deputies where appropriate. This should be done verbally and followed up with a record on CPOMS.

Staff are reminded of the need to report any concern immediately and without delay.

Where staff are concerned about an adult working with children in the school, they should report the concern to the Head. If there is a requirement to make a notification to the Head whilst away from school, this should be done verbally and followed up with an email to the Head.

Concerns around the Head should be directed to the Chair of Governors, Hilary Buckle.

The College will continue to offer support in the process of managing allegations.

DSLs will continue to report concerns to the Children's Single Point of Access/Children's Social Care in the borough in which the child lives in the usual way.

During office hours call **01635 503190**

Out of office hours, Emergency Duty Team Tel: **01344 786543**

## **Safeguarding Training and induction**

All school staff will continue to have safeguarding training and must have read part 1 and Annex B of Keeping Children Safe in Education (September 2024). The DSL should communicate with staff any new local arrangements, so they know what to do if they are worried about a child.

Online safeguarding training is still available for staff working from home via Educare.

Where new staff are recruited, or new volunteers enter the College, they will continue to be provided with a safeguarding induction.

If staff are employed from another education or children's workforce setting to our school, we will take into account the DfE supplementary guidance on safeguarding children that may be published at the time, and will accept portability as long as the current employer confirms in writing that:-

- the individual has been subject to an enhanced DBS and children's barred list check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual

Upon arrival, they will be given a copy of Safeguarding Policy and other related policies outlined in the Safeguarding Policy, confirmation of local processes and a remote meeting with the DSL regarding College procedures.



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## **Safer recruitment/volunteers and movement of staff**

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, the College will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of Keeping Children Safe in Education (September 2024) (KCSIE).

Where the College are utilising volunteers, we will continue to follow the checking and risk assessment process as set out in paragraphs 311 to 314 of KCSIE. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

The College will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found at paragraph 353 of KCSIE.

The College will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 357 of KCSIE and the TRA's 'Teacher misconduct advice for making a referral.

All referrals should be made by following the link at [GOV.UK](https://www.gov.uk).

It is essential from a safeguarding perspective that any school is aware, on any given day, which staff/volunteers will be in the school or college, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, the College will continue to keep the single central record (SCR) up to date as outlined in paragraphs 274 to 284 in KCSIE.

## **Online safety in schools and colleges**

The College will continue to provide a safe environment, including online. This includes the use of an online filtering system.

Where students are using computers in school, appropriate supervision will be in place.

## **Children and online safety away from the College**

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Safeguarding Policy and where appropriate referrals should still be made to children's social care and as required, the police.

Online teaching should follow the same principles as set out in the [Staff Code of Conduct](#).

The College will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.



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The below should be adhered to when delivering virtual lessons, especially where webcams are involved:

- Group sessions only - No 1:1 sessions without the permission of the Head or one of the College Deputy Heads. (1:1 sessions may be allowed for peripatetic music, LAMDA and mental health support sessions at the parent's discretion)
- Staff and children must wear suitable clothing, as should anyone else in the household
- Pupils should keep their camera on during lessons, unless parents/guardians have requested otherwise
- Pupils must keep their microphones turned off during lessons unless they are directed to turn on their microphone by the member of staff, to ask or answer questions
- Any computers used should be in appropriate areas
- If a member of staff is using their camera, they must ensure that the background is plain
- The live class should be recorded so that if any issues were to arise, the video can be reviewed
- Live classes should follow the school timetable
- Staff must only use Microsoft Teams as specified by the Senior Leadership Team and approved by our IT network manager / provider to communicate with pupils
- Staff should record attendance of any sessions held

All staff at the College should remind themselves of the following policies:

- Staff Code of Conduct
- Computer Usage Policy

## **Supporting children not in school**

The College is committed to ensuring the safety and wellbeing of all its pupils.

Where the DSL has identified a child to be on the edge of social care support, or who would normally receive pastoral-type support in school, they should ensure that a robust communication plan is in place for that pupil.

Details of this plan must be recorded in the Pastoral Support Stages, and a record kept of the contact made usually via email.

The communication plans can include; remote contact, phone contact, or email. Other individualised contact methods should be considered and recorded.

The College and its DSL will work closely with all stakeholders to maximise the effectiveness of any communication plan.

This plan must be reviewed regularly (at least once a fortnight) and where concerns arise, the DSL will consider any referrals as appropriate.

The College will share safeguarding updates with parents and pupils as required.

The College recognises that school is a protective factor for children and young people, and the current circumstances, can affect the mental health of pupils and their parents/guardians.



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Teachers at the College should be aware of this in setting expectations of pupils' work where they are at home.

### **Supporting children in school**

The College is committed to ensuring the safety and wellbeing of all its pupils.

The College will continue to be a safe space for all children to attend and flourish. The Head will ensure that appropriate staff are on site and staff to pupil ratio numbers are appropriate, to maximise safety.

The College will refer to the Government guidance for education and childcare settings relevant to any national emergency which has led to closure of the College.

The College will ensure that where we care on site, we will ensure appropriate support is in place for them.

Staff and volunteers should be aware that they may identify new safeguarding concerns about individual children as they see them in person following school closures. Any concern should be reported to the DSL immediately.

### **Child-on-Child Abuse**

The College recognises that during the closure a revised process may be required for managing any report of such abuse and supporting victims.

Where the College receives a report of child-on-child abuse, they will follow the principles as set out in part 5 of KCSIE and of those outlined within of the Safeguarding Policy.

The College will listen and work with the pupil, parents/guardians and any multi-agency partner required to ensure the safety and security of that young person.

Concerns and actions must be recorded and appropriate referrals made.

### **Mental Health**

Negative experiences and distressing life events, such as the circumstances which may lead to prolonged school closure, can affect the mental health of children and their parents. Where the College has children of critical workers and vulnerable children on site, and/or more children returning to school, schools we will ensure appropriate support is in place for them.

Those who will be working closely with the pupils will be in a position to identify children who might need additional support and liaise with the DSL to put this support in place. Mental health issues can bring about changes in a child's behaviour or emotional state which can be displayed in a range of different ways, all of which could be an indication of an underlying problem. This can include for example being fearful or withdrawn; aggressive or oppositional; or excessive clinginess. Support for pupils in the current circumstances can include existing provision in the College through the CLARITY programme, the Lay Chaplain or the Mental Health Practitioner, and if necessary, external agencies.



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Staff should be aware of the impact the current circumstances can have on the mental health of those pupils (and their parents) who are continuing to work from home, including when setting expectations of children's work.

## **Contingency Planning**

The College will continue to operate as normally as possible. In the event that restrictions in schools are needed, we will refer to a contingency framework which may be published by the government.





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## **OTHER APPENDICES**

- 2.1 [Keeping Children Safe in Education Part 1: Information for all school and college staff](#)
- 2.2 [What to do if you're worried a child is being abused: Advice for practitioners](#)
- 2.3 [Protecting children from radicalisation: the prevent duty](#)
- 2.4 [DfE Child Missing from Education \(September 2016\)](#)
- 2.5 [Mental Health and Wellbeing Policy](#)
- 2.6 Prevent Duty Risk Assessment
- 2.7 [Visiting Speakers Policy](#)
- 2.8 Staff Disqualification Declaration
- 2.9 Staff Safeguarding Procedures Declaration
- 2.10 New Staff Induction Ongoing Programme for Mentors
- 2.11 Low Level Concerns Reporting Form
- 2.12 [E-Safety Policy](#)