



SCARBOROUGH COLLEGE

Safeguarding and Promoting the Welfare of Children

Safeguarding Child Protection Policy and Procedure

Ratified by Board of Governors October 14 2023

To be reviewed & updated by September 2024

This policy applies to the whole of Scarborough College including the Pre-School, Prep School and the Senior School.

It is important to acknowledge that we define 'a pupil' at Scarborough College as a person **registered to attend the College** for a period of time (usually defined in terms of terms). A pupil will cease to remain a pupil at the point at which a term ends **AND** they have left the College.

Named personnel with designated responsibility for Child Protection:

Academic year	2023 – 2024
Designated Safeguarding Lead (DSL)	Mr Tim Cashell
Deputy Designated Safeguarding Lead (DDSL)	Mrs Julie Fraser
Designated Safeguarding Lead – Prep & EYFS	Mr Chris Barker
Deputy Designated Safeguarding Lead – Prep & EYFS	Mrs Kate Hill
Deputy Designated Safeguarding Lead (DDSL)	Mr Sam Thurgood
Deputy Designated Safeguarding Lead (DDSL)	Mr Rob Kench
Nominated Governor for Safeguarding	Mr James Cliffe
Chair of Governors	Dr John Renshaw
Headmaster	Mr Guy Emmett

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1 INTRODUCTION

- 1.1** Scarborough College is fully committed to safeguarding all in its care, including children in the EYFS and our boarders, and recognises that promoting the welfare of children and pupils is the responsibility of everyone that works at the College. We also recognise the stresses which can be placed upon members of staff and try to do all we can through appropriate training and support, including for those working in the EYFS and boarding. The staff code of conduct provides guidance for staff including for those working in one-to-one situations.
- 1.2** In keeping with statutory and related guidance (see 1.13 below) the College ensures that its approach is focused on the child's best interests, recognising that the term 'child' includes all pupils in the College.
- 1.3** Staff working at Scarborough College are advised to maintain an attitude of 'it could, and probably does, happen here' where safeguarding is concerned; to take all concerns seriously and encourage children and young people to talk to us about anything that worries them.
- 1.4** We recognise that each pupil has the right:
- to be free from any abuse;
 - to have staff in College with whom they can feel confident to discuss any concerns regarding child protection;
 - to have their self-esteem and self-confidence nurtured at all times;
 - to be educated in personal safety skills, the responsibilities of parenthood and how to become a responsible citizen, free from discrimination on the grounds of gender, disability, sexual orientation, race, creed or background.
- 1.5** The College pays particular attention to the guidance provided and inter-agency procedures stipulated by the local children's services and their designated officers. The College will work with the local safeguarding partners in accordance with the North Yorkshire (NYSCP) procedures www.safeguardingchildren.co.uk. Every complaint or suspicion of abuse from within or outside the College will be investigated and in all proper circumstances will be referred to an external agency such as the social services department of the local authority (SSD), the child protection unit of the police (CPU) or the NSPCC.
- 1.6** An anonymous report will be acted upon in the same manner as any other report, but this fact will be kept in mind when considering the context of allegation.
- 1.7** The Governing body takes seriously its responsibility under section 157 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our College to identify, assess, and support those children who are suffering harm.
- 1.8** Safeguarding and promoting the welfare of children is defined in paragraph 4 of KCSIE as 'protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.' These are the fundamental principles to which the College adheres. In order to promote these principles most effectively, we do all we can to ensure that the College provides a listening environment where our pupils feel able to speak freely to our staff.
- 1.9** Everyone within the College community who comes in to contact with children and their families has an important role to play in safeguarding and providing a safe environment in which pupils can learn. There are, however, several key members of staff who play an important role, and these are the College's Safeguarding Team, and their contact details are available in section 2.1 of this document.

1.10 The Designated Safeguarding Leaders (DSL) and the Deputy (DDSL) are most likely to have a complete safeguarding picture and are the most appropriate people to advise on the response to safeguarding concerns. However, should the need arise, anyone may refer a safeguarding issue directly to the local authority or to the Police.

1.11 We recognise that all adults working or visiting the College, including temporary staff, volunteers, and governors, have a full and active part to play in protecting our pupils from harm, and that the child's welfare is our paramount concern.

1.12 The College follows the non-statutory guidelines relating to COVID-19 and remote learning.

1.13 Key documents and statutory guidance which provide the background to this policy:

- Keeping Children Safe in Education September 2023
- Revised Policy scheduled for implementation September 2023:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1181955/Keeping_children_safe_in_education_2023.pdf
- Working together to Safeguard Children 2018 (last updated December 2020)
- Prevent Duty (revised September 2023)
- Statutory Guidance - Sex Education, Relationships and Sex Education (RSE) and Health Education (last updated September 2021)
- RSE statutory guidance:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1090195/Relationships_Education_RSE_and_Health_Education.pdf
- Sexual violence and sexual harassment between children in schools and colleges (last updated September 2021) was withdrawn in September 2022 and now rests with KCSiE
- Revised NMS for boarding (last updated 5 September 2022):
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1160273/National_Minimum_Standards_for_boarding_schools.pdf

See also: What to do if you are worried a child is being abused. Advice for practitioners (March 2015); Multi-agency statutory guidance on female genital mutilation (updated July 2020); Children missing education. Statutory guidance for local authorities (updated September 2016).

1.14 This policy has been approved by the Board of Governors of Scarborough College, is addressed to all members of staff and volunteers, is available to parents on request and is published on the School website. It applies to all adults, including volunteers, working with pupils in or on behalf of Scarborough College even when this is away from College, for example at an activity centre, on an away sports fixture, or on an educational visit. In addition, Boarding Staff and Staff Residing on College premises must also refer to the terms and conditions within their License Agreement and the relevant Accommodation Policy.

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes in to contact with children and their families and carers, has a role to play in safeguarding children. In order to fulfil this responsibility effectively, **all professionals should make sure their approach is child centred**. This means that they should consider, at all times, what is in the best interests of the child. It is important to note that both physical and mental health are relevant to safeguarding and the welfare of children.

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information & taking prompt action. Safeguarding incidents and behaviours can be associated with external factors, and staff should consider whether a child is at risk of extra-familial abuse or exploitation.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Safeguarding includes the establishment and implementation of procedures to protect children (those under the age of 18) from deliberate harm. However, safeguarding also encompasses all aspects of pupils' health, safety and well-being. It is therefore important to acknowledge that we define 'a pupil' at Scarborough College as a person **registered to attend the College** for a period of time (usually defined in terms of terms). A pupil will cease to remain a pupil at the point at which a term ends **AND** they have left the College.

1.15 Definitions and Glossary of terms used frequently

Safeguarding	Promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, promoting mental and physical health and development, and taking action to enable all children to have the best outcomes.
Child Protection	Refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.
Staff	Refers to all those adults working for or on behalf of the College, full time or part time, temporary or permanent, including supply staff, in either a paid or voluntary capacity including governors and contractors.
Child	Includes all under the age of 18: note that our need to protect the welfare of pupils applies to vulnerable adults still at College aged 18+.
Parent	Refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers, guardians, and adoptive parents.

DBS: Disclosure & Barring Service
DSG: Designated Safeguarding Governor
DSL: Designated Safeguarding Lead
DST: Designated Safeguarding Team (DSLs & Deputy DSL)
(LA)DO: Designated Officer for Local Authority
TRA: Teaching Regulation Agency

Summary Guidance

1.15 Disclosures

If a child discloses to you or you suspect abuse:

- Report any disclosure immediately to a DSL or, in their absence, the DDSL.
- Do not question a child should you suspect abuse but refer your suspicion to the DSL or DDSL immediately.
- Make a clear record of what the child has said to you and give this to the DSL or DDSL.
- Do not ask leading questions and do not promise confidentiality to the child.
- Ensure that the child is safe.
- Do tell the child that you must speak to a DSL or the DDSL.
- Be guided by the DSL or DDSL as to what you should do next: do not investigate yourself.
- Do not discuss the issue with colleagues, friends, family, or anyone else unless otherwise directed by the DSL or DDSL
- Be aware that you may contact local children's services and/or the Police directly.

Remember: It is important for all staff to understand that some children may find it hard to tell someone they are being abused: they may not be ready or know how to do so. Hence, we provide a wide range of avenues for children to speak out with confidence that support will be available, and action will be taken, including tutors, boarding staff, trusted adults for LGBTQIA+ pupils, class teachers, counsellors, independent listeners, senior pastoral staff, medical staff.

1.16 Child-on-child abuse including sexual harassment or violence.

If a child discloses to you or you suspect abuse:

- Report this immediately to the DSL or in their absence a DDSL.
- Make a clear record of what the child has said to you or of the information given to you.
- Be guided by the DSL or DDSL as to what you should do next: do not investigate yourself.

In all cases of disclosure: reassure victims that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.

1.17 Allegations against and low-level safeguarding concerns regarding staff other than the Head

- Report an allegation immediately to the Head or in his absence the Chair of Governors without informing the person against whom the allegation has been made.
- Report a low-level concern to the Head or in his absence to the DSL without informing the person relating to whom the concern applies.
- Should you believe that there may be a conflict of interest on the part of the Head, refer the matter to the Chair of Governors and/or the local children's services.
- Be aware that should the need arise, you may contact local children's services and/or the Police directly.

1.18 Allegations against and low-level safeguarding concerns regarding the Head

- Report this immediately to the Chair of Governors without informing the Head.
- Be aware that should the need arise, you may contact local children's services and/or the Police directly.

2 CONTACTS

2.1 School contacts:

Overall Designated Safeguarding Lead (DSL): Tim Cashell

Phone: 01723 360 620, internal extension 331; mobile 07487 828403

Deputy Designated Safeguarding Lead (DDSL): Julie Fraser

Phone: 01723 360 620, internal extension 309; mobile 07875 673571

Designated Safeguarding Lead (Prep and EYFS): Chris Barker

Phone: 01723 380 606, internal extension 234; mobile 07989 655573; home 01653 696 740

Deputy Designated Safeguarding Lead for Prep (DDSL): Kate Hill

Phone: 01723 380 606, internal extension 244; mobile 07984 744943

Deputy Designated Safeguarding Lead (DDSL): Sam Thurgood

Phone: 01723 360 620, internal extension 358; mobile 07525 167950

Deputy Designated Safeguarding Lead (DDSL): Rob Kench

Phone: 01723 360 620, internal extension 246; mobile 07535 408919

School Nurse: Linda Pinkney

Phone: 01723 380 604; internal extension 212; mobile 07974 169584

Headmaster: Guy Emmett

Phone: 01723 360 620, internal extension 206; mobile 07717 185359

Designated Safeguarding Governor (DSG): James Cliffe

Phone: 01609 797495; mobile 07863 169584

Chair of Governors: John Renshaw

Phone: 01723 366122; mobile: 07721 538536 email: jrsteeth@gmail.com

2.2 Key local authority contacts:

If you have concerns about a child you wish to refer, or discuss, please use the following contacts:

for advice, please ask to speak to a Team Manager in your area

NYCC Customer Service Centre, County Hall, East Block, Northallerton, DL7 8AH

Telephone: 03000 200 190

social.care@northyorks.gov.uk

For other contact details, please see www.northyorks.gov.uk

If a child is in immediate danger or is at risk of harm anyone can make a referral to Children and Family services: 01609 780 780

NY Local Authority Designated Office: karen.lewis@northyorks.gov.uk 01609 534 200

2.3 Inspectorates: anyone may contact Ofsted, or the Independent Schools Inspectorate (ISI) should they believe the College is not acting in a suitable manner with regard to safeguarding:

- Ofsted: 0300 123 466 or email CIE@ofsted.gov.uk
- ISI: 0207 600 0100 or email concerns@isi.net

2.4 Other external contacts

- Help reporting child abuse: <https://www.gov.uk/report-child-abuse-to-local-council>
- NSPCC Child Protection Helpline: 0808 800 5000
- NSPCC Report Abuse in education Helpline: 0800 136 663 or help@nspcc.org.uk
- NSPCC Whistleblowing Helpline: 0800 028 0285
- NSPCC FGM helpline: 0800 028 3550 fgmhelp@NSPCC.org
- Police Prevent team: 101 and ask for the Prevent Team
- Prevent <https://act.campaign.gov.uk/> or telephone 0800 789 321
- Police non-emergency: 101
- Police emergency: 999
- DBS Helpline: 03000 200 190

2.5 If there is a **risk of immediate physical or mental harm to a child**, staff should act immediately.

2.6 Anyone may make a referral to children's services or the police.

Depending on the situation, they should call the relevant local authority number for advice or in an emergency call 999 straight away and/or contact the DSL who may call other relevant agencies. Where appropriate, and following local authority and/or police guidance, the DSL will inform parents of this contact/referral: staff should never do this themselves.

2.7 At least one member of the DST should always be available to discuss safeguarding concerns. If the team is absent from College for any reason, contact details of alternative support will be given to all staff via email.

2.8 Staff should not assume that another colleague or professional will act.

2.9 Whistleblowing: staff may use the College's whistleblowing policy to draw attention in good faith to any perceived failing with regard to safeguarding practice either in individual cases or concerning more general circumstances.

2.10 The following Information is made available to **pupils**:

School Counsellor – Kev Riley	07494 773 213	kev.riley@scarboroughcollege.co.uk
Independent Listener – Sue Higgins	07817 683 273	
Childline – 24 hrs. counselling and advice	0800 11 11	www.childline.org.uk
NSPCC Child Protection Helpline (24hrs)	0808 800 5000	www.nspcc.org.uk
The Samaritans (local)	0330 094 5717	
or the Samaritans (24hrs)	116 123	www.samaritans.org.uk
‘The Line’ (for Looked After Children)	0800 884 444	
The Office of the Children’s Commissioner		www.childrenscommissioner.gov.uk

Kidscape (www.kidscape.org.uk) offers excellent advice on making friends, changing schools, protecting yourself, what to do if you feel you are being bullied etc.

The College’s arrangements for consulting with and listening to pupils are provided via EYFS ‘Key Workers’, Senior School Tutors and Prep School form teachers, the School Council, the Boarding Council, by Sixth Form ‘Peer Support’, the School Counsellor and by an Independent Listener. We make pupils aware of these arrangements by posters in College and in the boarding houses as well as in assemblies. Senior pupils in the College, including College Prefects and Peer Mentors, are briefed on the appropriate action to take should they receive any allegations of abuse and undertake the NYSCB ‘Basic Awareness in Child Protection’ training.

2.11 The College shares a purpose with **parents** to keep children safe from harm and to have their welfare promoted. Parents may wish to consult the following for more information:

NYSCB	www.safeguardingchildren.co.uk	
NSPCC	www.nspcc.org.uk	
CEOP	www.ceop.gov.uk www.thinkuknow.co.uk/parents	
Parents Protect	www.parentsprotect.co.uk	0808 1000 900
Internet Matters	http://www.internetmatters.org/	
Parent Zone	http://www.theparentzone.co.uk/parent	
Childnet	http://www.childnet.com/resources/know-it-all-for-parents	
Parents Protect	www.parentsprotect.co.uk	

We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents’ rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so in order to protect a child. The College will share with parents any concerns we may have about their child, unless to do so may place a child at risk of harm.

We encourage parents to discuss any concerns they may have with Form Tutors or Heads of Tier in the first instance. These colleagues are then able to pass the concerns on to a senior member of staff if necessary.

We make parents aware of our policy via the prospectus pack, the College website and through the frequent newsletters, which contain a specific mention after the annual update has taken place and the new policy has been added to the College website. Parents are also made aware that they can view or obtain a paper copy of the policy on request.

3 SAFEGUARDING AIMS

- 3.1** At Scarborough College we are committed to safeguarding children and young people, and we expect all staff to share this commitment. Adults in our College take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child. The College will assess the risks and issues in the wider community when considering the well-being and safety of our pupils.
- 3.2** To support the child's physical and mental development in ways that will foster security, confidence and independence.
- 3.3** To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties, understanding that staff will always listen to them.
- 3.4** To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse; specifically: to ensure that staff know: how to identify the signs of abuse and neglect: how to pass on and record concerns about a pupil; that they have an individual responsibility to be alert to the signs and indicators of abuse and for referring child protection concerns to the DST; that they have a responsibility to provide a safe environment where children can learn.
- 3.5** To provide a systematic means of monitoring children known or thought to be at risk of harm or in need of early intervention and support, and to ensure that the College contributes to assessments of need and support plans for those children.
- 3.6** To develop a structured procedure within the College which will be followed by all members of the College community in cases of suspected abuse.
- 3.7** To develop and promote effective working relationships with other agencies, especially the Police and other appropriate external children's services.
- 3.8** To ensure that all staff including supply staff and volunteers working within the College who have substantial access to children have been checked prior to their starting dates as to their suitability, including verification of their identity and an enhanced DBS check as well as other required pre-appointment checks, and a central record is kept for audit.
- 3.9** To ensure that all pupils are provided with the guidance they need to keep themselves safe including when online including when using advanced mobile technology.
- 3.10** To ensure that the welfare and wellbeing of all children and pupils including those in the EYFS and our boarders are promoted effectively.
- 3.11** In order to further to promote the welfare and safety of students, to safeguard that the protected characteristics of students under the Equality Act 2010, including:
- age
 - disability
 - gender reassignment
 - race
 - religion or belief
 - sex
 - sexual orientation
 - marriage and civil partnership
 - pregnancy and maternity
- 3.12** To ensure that the safeguarding policy is up to date, incorporating the most recent DfE and local authority guidance, and is suitable for its purposes: the policy will be reviewed at least annually by the leadership of the College and following scrutiny by the governing body and any changes required the policy will be published to staff and to parents.

3.13 To recognise the importance of the role of the DST and ensure they have the time, funding, training, resources, and support necessary to undertake their duties which include, providing advice and support to staff, pupils' online safety, taking part in inter-agency meetings and contributing to the assessment of children in need.

3.14 To maintain confidentiality with regard to safeguarding matters: the Head and DST will disclose information about a child to other members of staff on a need-to-know basis only.

4 GUIDING PRINCIPLES OF SAFEGUARDING FOR STAFF

4.1 Each and every employee of the College and governor, contractor, and volunteer at the College is under a general moral and professional duty to:

- Ensure that the best interests of the child are paramount.
- Understand that the College provides an environment in which all pupils should feel able to speak freely.
- Seek to understand the child's point of view, always listening carefully to all they have to say, and wherever possible take it into account.
- Ensure that staff should not assume that somebody else will act and share information that might be critical in keeping children safe.
- Listen to the views of the child, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction: Scarborough College provides a listening environment for its pupils.
- Be aware of the College's child protection procedures and to follow them.
- Know how to access and implement the procedures, independently, if necessary.
- Keep a sufficient record of any significant complaint, conversation, or event.
- Report any matters of concern immediately to a DSL.
- Remember that no school is immune to a safeguarding issue.

4.2 Recognise that any child may benefit from early help and interventions, but all College staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether they have an education, health, and care plan or not);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups; or is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking, or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- note that children will sometimes blame themselves when they hear or see violent words or actions in the home; just hearing a violent quarrel will seriously unsettle many children; staff should therefore be aware of the specific impact of domestic abuse on children and how it might affect them;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

4.3 We aim to ensure that children receive the right help, at the right time to address risk and prevent issues escalating.

4.4 Staff will undertake appropriate formal safeguarding and child protection training which is regularly updated in accordance with KCSIE and local authority guidance. In addition, all staff members should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard

children effectively. The specific training will include online safety including the dangers of grooming, cyber-bullying and social media, peer-on-peer abuse, radicalisation, and dealing with harmful behaviours such as drug taking, alcohol abuse, sending nudes and semi-nudes. Staff will be made aware that: safeguarding incidents and/or behaviours can be associated with factors outside the College and can occur between children outside the College; and that a child may be at risk of abuse or exploitation in situations outside their families and be vulnerable to a variety of harms including sexual and criminal exploitation and serious youth violence.

- 4.5** 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. 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. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, referring the concern to the DST.
- 4.6** The College will always consider sharing our intention to refer a child to local children's services with their parents/carers unless, to do so, could put the child at greater risk of harm, or impede a criminal investigation: HOWEVER, if in any doubt whatsoever, the College will consult with the local children's services and/or the police on this point.
- 4.7** There will be occasions when staff may suspect that a pupil may be at risk but have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, staff may try to give the pupil the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill, or an accident has occurred. It is fine for staff to ask the pupil if they are OK or if they can help in any way.
- 4.8** Staff should use the College's reporting system to register any concern relating to safeguarding, to record these early concerns and then speak with the DSL as soon as possible. If the pupil does begin to reveal that they are being harmed, staff should follow the advice in this policy. Following an initial conversation with the pupil, if the member of staff remains concerned, they should discuss their concerns with the DSL, who will assess the situation and keep the member of staff informed. It is not the end of the member of staff's responsibility when they report it, they should expect feedback and should act if they do not receive satisfactory feedback.
- 4.9** Any parents who wish to report a safeguarding concern may contact a DSL or Head as appropriate directly at Scarborough College.
- 4.10** Concerns which do not meet the threshold for child protection intervention will be managed through the pastoral system working with key staff to help address the issue(s).
- 4.11** Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Scarborough College will share information based on the guidance document [Information sharing: advice for practitioners providing safeguarding services. \(DfE, 2018\)](#) noting that the Data Protection Act 2018 does not prevent the sharing of information for the purposes of keeping children safe.

5 TRAINING

5.1 Designated safeguarding lead (DSL) and deputies (DDSLs):

- Each member of the designated safeguarding team (DST) will receive suitable training updated at least every two years in accordance with local authority guidelines and will include guidance about inter-agency practice; the deputy DSLs will be trained to the same level as the DSL.
- Knowledge and skills will be refreshed at regular intervals and at least annually through attendance at online and in person training events.

- Training for the DSL and DDLs will provide them with a good understanding of their own role, and the processes, procedures, and responsibilities of other agencies, particularly children's social care.
- The DST will also maintain effective liaison with local children's and inter-agency services to ensure that their understanding of safeguarding practice is up-to-date and sufficiently detailed.
- The DST will have an in-depth understanding of DfE guidance including the most recent editions of KCSIE in its entirety, Working Together and other statutory or related guidance.
- At least one member of the DST will be responsible for ensuring that the College takes appropriate measures to deal with its Prevent duties in accordance with the most recent anti-extremist guidance.
- At least one member of the DST will be responsible for ensuring that the College takes appropriate measure to deal with looked after children in accordance with the most recent guidance from the local children's services.
- The DST will be responsible for ensuring that suitable safeguarding training is provided for all members of the College community, updated at least annually. This training will include guidance on early help and interventions.
- Training for the College community will include informal as well as formal updates and briefings orally or by email.
- The DST will be responsible for ensuring that suitable records are maintained for safeguarding training both formal and informal for the DST, staff, governors, and others within the College community.
- At least one member of the DST will be responsible for online safety in the College and as such they should receive suitable training to allow them to discharge their responsibilities effectively.
- At least one member of the DST team will ensure that all members of staff are trained effectively to promote an awareness of the need for online safety amongst pupils.
- At least one member of the DST will be responsible for ensuring that the senior leadership and the governing body receive suitable safeguarding training, updated at least annually.
- The DST will ensure that at least one person trained in safer recruitment is a member of each appointments panel for new members of staff.
- The DST will ensure that there are a number of trusted adults trained to listen to and provide support for LGBTQIA+ pupils.

5.2 Induction

All members of staff will receive either prior to their starting dates or as soon as possible thereafter suitable safeguarding training which will include:

- Meeting with at least one member of the DST.
- Knowing the identities of the DST
- Reading and having a working understanding of at least Part 1 and Annex B of the latest edition of KCSIE, unless it is decided that the member of staff concerned has no continual direct contact with pupils and so is asked to have a working understanding of Annex A (the condensed version of part) 1 only.
- Receiving suitable online training as directed by the DST.
- Reading the College's safeguarding policy and having a working understanding of how to manage safeguarding situations including disclosures, peer-on-peer abuse, child-on-child sexual violence, sexual harassment, allegations against staff, low-level concerns regarding staff, and the use of mobile technology and cameras especially in EYFS.
- Understanding the College's approach to online safety and the processes of filtering and monitoring that the College operates.
- Reading and understanding the College's policies and procedures for pupil behaviour, missing children, registration, and anti-bullying.
- Reading the College's whistleblowing policy and having a working understanding of how it may be used about safeguarding.
- Reading and understanding the staff behaviour (code of conduct) with particular regard to safeguarding matters, including guidance on staff/pupil relationships and the use by staff of mobile technology in College and of social media, and the guidance on the acceptable use of IT.
- Reading and understanding the guidelines on supervision in the Supervision of Pupils policy, including guidance for a member of staff who finds themselves in a one-to-one situation with a pupil or child.

5.3 Staff

- All members of staff will receive an update on safeguarding at least annually, with this including any changes to KCSiE and local authority guidance as well as reinforcement of key points from previous training.
- All members of staff will receive regular safeguarding updates through staff meetings, all-staff emails, and other appropriate mechanisms.
- All members of staff will be reminded at least annually of their obligations set down within the College's safeguarding policy and related policies including Anti-Bullying, Social Media and sending nudes and semi-nudes, guidance on the management of peer-on-peer abuse, awareness of the threshold for regarding bullying as a child protection matter, guidance on the acceptable use of IT, a reminder of the filtering and monitoring system at the College, the use of social media, and the staff behaviour code of conduct.
- All members of staff will receive guidance on early help and interventions and will support the pastoral team and DSTs in this area.

5.4 Contractors and Visitors

- The DST liaising with the HR Department will take a risk-assessed view as to the safeguarding guidance provided for contractors, community users of the College facilities and for visitors to the College and as to how this is managed in practice.
- HR staff will ensure that all contractors and visitors who may come into unsupervised contact with pupils have been subject to appropriate checks including as a minimum ID, barred list, and enhanced DBS.
- The College acknowledges that it has a duty to report any allegations made about an external agency or individual on the school site.

5.5 HR personnel

- The DST will ensure that members of the HR staff are suitably trained to ensure that pre-appointment and other safeguarding checks are carried out and that records are maintained effectively. KCSiE (2023) makes it clear that candidates should be explicitly told that checks will be made of social media accounts.
- HR staff will be trained in procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS and consider a referral to the Teachers Regulation Agency (TRA) if a person has been dismissed or removed due to safeguarding concerns or would have been had they not resigned or otherwise left the College.
- The HR team will receive sufficient training to ensure effective liaison with the senior leadership prior to the starting dates of new staff.

5.6 Governors

- The DST and Head will ensure that the designated member of the governing body for safeguarding receives suitable and regularly updated training for their role.
- The DST and Head will ensure that all members of the governing body receive suitable safeguarding training and updates (at least annually) to include all relevant parts of KCSiE and other guidance from the DfE and local authority. Key Governors (e.g. Chair, DSG, Committee Chairs) attend annual INSET training.
- The DST and Head will ensure that the governing body review the safeguarding policy and its implementation at least annually.
- Keeping in mind the requirements of KCSiE (2023), all Governors are ensured that filtering and monitoring provision is reviewed at least annually, to identify the current provision, any gaps, and the specific needs of your pupils and staff. In addition, governors identify and assign a member of the senior leadership team and a governor, to be responsible for ensuring these standards are met. SMT reviews of Filtering and Monitoring would involve the governor assigned to this role.
- Governors must be sufficiently well-trained to allow them to make a considered judgement that the leadership and management of the College have sufficient skills, training, and experience to fulfil their safeguarding responsibilities effectively. In particular:

- Governors will ensure that they have within their number the necessary skills to ensure that the College carries out pre-appointment checks effectively.
- Governors will ensure that they have within their number the necessary skills to ensure that the College provides effective online safety including monitoring and filtering the internet.
- Governors should be aware of the various pressures relating to safeguarding upon staff and pupils from the EYFS onwards including our boarding environment. Governors will therefore receive periodic presentations from key staff and from pupils.
- The member of the Governing Body nominated to liaise with the College and local authority on child protection issues (the DSG) should be sufficiently well trained to be able to monitor and challenge the DST effectively and to act appropriately in the event of an allegation of abuse made against the Head.

5.7 Pupils

- The DST will ensure that all pupils receive suitable age-related guidance about safeguarding matters including the action to take should they receive a disclosure or be concerned about another pupil.
- The DST will ensure that pupils receive suitable guidance about the reason for, and extent of, the College's filtering and monitoring system. This extends to the use of the College's Wi-Fi system as well as the use of College devices, at home or in school.
- The DST will ensure that all pupils will receive suitable age-related guidance on safeguarding matters including what to do if they feel unsafe.
- The DST will ensure that pupils receive suitable age-related guidance about staying safe online and to the safe use of social media, including an awareness of harmful challenges, misinformation, and hoaxes, PSHE and safeguarding, and relationship and sex education.
- Pupils will receive age-related guidance on child-on-child sexual violence and sexual harassment, including ensuring that they understand the law as a protection for them and understanding such abuse within the family and the impact on siblings.
- Pupils with responsibilities, including prefects, have a particular responsibility to be vigilant and to report their concerns: all such pupils will receive appropriate safeguarding training.
- Pupils will receive this information e.g., through a mix of assemblies, PSHE and subject lessons, and notices around the College.

5.8 Parents

- The DST will ensure that parents are provided with suitable guidance regarding the College's approach to safeguarding.
- The DST will ensure that parents receive suitable guidance about the reason for, and extent of, the College's filtering and monitoring system. This extends to the use of the College's Wi-Fi system as well as the use of College devices, at home or in school.
- The DST will, from time to time, provide suitable presentations for parents on safeguarding matters such as online safety, noting that most online abuse takes place at home and not at school.

6 RESPONSIBILITIES

6.1 Governors

- The governors as a corporate body have ultimate responsibility for safeguarding within the College.
- The governors shall receive an annual safeguarding audit from the DST.
- The governors will review the safeguarding policy, the filtering and monitoring system and its implementation at least annually.
- The governors will monitor and challenge appropriately the DST and the senior leadership of the College to ensure that the safeguarding policy is effectively implemented, using as appropriate: visits to the College; discussions with staff and with pupils; staff, pupil and parental questionnaires and surveys; scrutiny of records relating to safeguarding, bullying and behaviour, and early help and interventions.
- A designated member of the governing body (DSG) will be assigned to liaise on all safeguarding matters with the DST and the leadership of the College and local children's and other services; at

least once each term, this designated member of the governing body will meet with the DST as a whole; should there be an allegation against the Head, the Chair of Governors will immediately contact the designated officer for the local authority and if appropriate will liaise with the DSG in managing the allegation.

- The governors will ensure that they receive suitable and regular safeguarding training from the senior leadership, DST, and external sources.
- This training will include (in accordance with the latest edition of KCSIE): updated guidance on filtering and monitoring, forced marriages, county lines, Operation Encompass which provides emotional and practical help to children e.g. in cases of Domestic Abuse, and obtaining further resources on Child Sexual Abuse.
- The Chair of Governors will be responsible for liaising with the relevant external agencies in the event of their being a safeguarding allegation against the Head.
- The governors will ensure that relevant staff have due regard to the relevant data protection principles which allow them to share or withhold as appropriate personal information, as provided for in the GDPR and Data Protection Act 2018: practitioners may share safeguarding personal information without consent where this will enhance the safeguarding of a child; where serious harm is possible, again this is a good reason for withholding information.
- Governors should ensure Child Protection files are maintained as set out in Annex C of KCSIE.
- Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. In cases of doubt, legal advice should be sought.

6.2 Senior Leadership and Head

- The senior leadership will include the designated safeguarding leads.
- The senior leadership must monitor and challenge the DST in an appropriate manner to ensure that it discharges its duties effectively.
- At least once each term, the Head will meet with the DST as a whole.
- The senior leadership shall receive an annual safeguarding audit from the DST.
- The senior leadership shall ensure that all members of the DST are effectively trained and that this training is up to date.
- The senior leadership should ensure that the DST and members of staff generally understand and act appropriately about pupils with vulnerabilities and sensitivities and needs, and those with SEND and EAL and those who are looked after or who are being supported by local agencies.
- The senior leadership must ensure that IT systems and their use in the College are subject to appropriate filtering and monitoring and that there are termly reviews of the system.
- The Head will be responsible for liaising with the relevant external agencies in the event of their being a safeguarding allegation against a member of staff.
- The Head must have an overview and also understand how to deal with, record and, if necessary, report low-level concerns as well as allegations.
- The Head and senior leadership will be aware of updated guidance in the latest edition of KCSIE, including on filtering and monitoring, forced marriages, county lines, Operation Encompass which provides emotional and practical help to children e.g. in cases of Domestic Abuse, and obtaining further resources on Child Sexual Abuse.

6.3 DSL and DST

- The DSLs will be responsible to the Head and to the governors for the effective discharge of the safeguarding responsibilities of the DST; they will liaise with the Head and governors as required and at least on a termly basis.
- The DST will act immediately when it becomes aware of any disclosure or allegation or a child at risk, liaising directly with the three safeguarding partners: the local authority and local children's services; the chief officer of police for the area; and the clinical commissioning group for the area, as guided by *Working Together*. Where the College is named as a relevant agency the DSL will note and abide by the statutory duties required.
- The DST is responsible for ensuring that suitable and up-to-date safeguarding training is provided for themselves, the senior leadership, governors, staff including those working in EYFS and boarding, HR

personnel, pupils, parents, contractors and visitors and that suitable confidential records are kept of this training as set down in above.

- The DST will promote an environment within which the vulnerable children are protected, including when appropriate ensuring that staff are aware of, and are provided with the means to support, the specific needs of children, including children with a social worker; a culture of high aspirations for these children will be maintained. This may mean sharing information about the welfare, safeguarding and child protection issues that children are experiencing or have experienced, with teachers and the College leadership team.
- The DST will provide guidance and support for staff in all areas relating to safeguarding, including information about, and the management of: disclosures of abuse; allegations against staff; reports of extremism, instances of child-on-child abuse, sexual harassment and child sexual violence; examples of bullying which may be regarded as a safeguarding matter, i.e. when they are sufficiently serious as to cause or threaten significant harm; online safety; and children in need of support and early intervention.
- The DST will ensure that suitable measures are in place to provide pupils with effective education for safeguarding themselves including when online including when they are online at home or away from, College.
- Online safety training for which the DSL takes overall responsibility should cover the 4 areas of risk: content, contact, conduct and commerce and include awareness of the dangers of online challenges, misinformation, and hoaxes.
- The DST will ensure that suitable measures are in place to filter and monitor, as set out in KCSiE (2023), the use of the Internet at College and the use of College devices, to alert the DST to any problematic use, and to provide guidance on the use of 'smart' systems including 3G/4G/5G technology.
- The DST will liaise with pastoral staff to promote an environment in which pupils feel safe and able to speak to adults about their concerns.
- The DST will consider and provide suitable mechanisms through which both pupils and parents may be involved in supporting the College in its approach to safeguarding.
- The College will provide a suitably detailed job description for each member of the DST.
- The DST will provide continuing support to a pupil about whom there has been concerns, and who leaves the College, by ensuring that appropriate information is provided or copied as guided by local children's services under confidential and secure cover to the child's new setting and ensuring the College medical records and safeguarding files are forwarded as a matter of priority.
- The DST will notify children's social care if a child with a child protection plan is absent for more than two days without explanation (or sooner if required by the social worker)
- The College will normally seek to discuss any concerns about a pupil with their parents unless otherwise guided by local children's services and/or the police. This must be handled sensitively, and a member of the DST will contact the parent in the event of a concern, suspicion or disclosure. This may be delegated to another member of the Pastoral Staff, depending on the severity of the concern.
- However, if the College believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and, if necessary, the police.
- Pupils and their parents have access to a complaints procedure in relation to issues affecting their welfare.
- Where at risk children leave the College, the DSL will ensure that their child protection files are securely transferred to their new College as soon as possible and that the relevant local agencies are notified of the child's departure.
- The DSL and the DST will be aware of updated guidance in the latest edition of KCSiE, including on appropriate adults forced marriages, county lines, Operation Encompass which provides emotional and practical help to children e.g. in cases of Domestic Abuse, and obtaining further resources on Child Sexual Abuse.

6.4 Staff

- All staff should receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring – see para 141 KCSiE (2023) for further

information) at induction. The training should be regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

- Members of staff should have a suitable understanding of KCSIE and of this safeguarding policy, of the types and signs of abuse.
- Members of staff should have a suitable understanding of the management of disclosures, allegations, and other safeguarding concerns.
- Members of staff must understand that if there is a risk of immediate harm to a child, they should act immediately. Delay is unacceptable.
- Members of staff, in regard to filtering and monitoring, are aware that they should make a report when:
 - ◆ they witness or suspect unsuitable material has been accessed;
 - ◆ they access unsuitable material;
 - ◆ they are teaching topics which could create unusual activity on the filtering logs;
 - ◆ there is failure in the software or abuse of the system;
 - ◆ there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks;
 - ◆ they notice abbreviations or misspellings that allow access to restricted material.
- Members of staff should follow the guidelines set down for listening to children, avoiding leading questions or avowals of belief in what is being disclosed by the child.
- Members of staff must never promise confidentiality to a pupil when this may compromise their safety or well-being.
- All staff must be aware that the College has a professional as well as legal responsibility to share information with other agencies in order to safeguard children.
- Although they should understand that the DST is there to provide guidance and act on behalf of the child and the College, members of staff should be aware that anyone may make a referral to children's services or the police.
- Members of staff should never contact parents themselves: this is a matter for the DST or for local agencies.
- Members of staff should not assume that another colleague or professional will act on a safeguarding matter and should contact the DSL or appropriate external agency.
- If members of staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, speaking to the DSL or a member of the DST.
- Members of staff may use the College's whistleblowing policy to draw attention, in good faith to any perceived failing about safeguarding practice either in individual cases or concerning more general circumstances.
- Every member of staff should play their part in providing a safe and listening environment for pupils.
- The College's Staff Code of Conduct sets out our expectations of staff and is read and agreed by all staff members, with regard to safeguarding matters including staff/pupil relationships and the use of social media, but also taking note of the following requirements:
 - ◆ treating all pupils with respect;
 - ◆ setting a good example by conducting ourselves appropriately;
 - ◆ involving pupils in decisions that affect them;
 - ◆ encouraging positive, respectful and safe behaviour among pupils;
 - ◆ being a good listener;
 - ◆ being alert to changes in pupils' behaviour and to signs of abuse, neglect and exploitation;
 - ◆ recognising that challenging behaviour may be an indicator of abuse;
 - ◆ reading, understanding and putting into practice, the College's child protection policy, staff behaviour policy and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact, sexual exploitation, extremism, e-safety and information-sharing;
 - ◆ asking the pupil's permission before initiating physical contact, such as assisting with physical support during PE, Music or Drama or administering first aid;
 - ◆ maintaining appropriate standards of conversation and interaction with and between pupils and avoiding the use of sexualised or derogatory language;
 - ◆ being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse, (contextual safeguarding);

- ◆ applying the use of reasonable force only as a last resort and in compliance with College and the local authority's Safeguarding Children Partnership procedures;
 - ◆ referring all concerns about a pupil's safety and welfare to the DSL, or, if necessary, directly to police or children's social care;
 - ◆ abiding by the guidance provided on the use of cameras and mobile technology in the EYFS: only school equipment may be used and, with the written permission of the Head of EYFS, who will take note of any restrictions regarding individual children.
- All College staff will be aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.
 - In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual.
 - This means that any sexual activity between a member of the College staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.
 - It is also viewed as an abuse of trust if there is a relationship between a member of staff and a pupil over the age of 18.
 - Any member of staff leading a trip or visit outside of College should liaise with the person responsible for educational visits and the DST to ensure that all appropriate safeguards are in place.
 - All boarding staff must ensure that contact with pupils is always appropriate and never takes place in the private spaces and accommodation in boarding houses assigned to boarding staff.
 - All staff must follow the guidance provided on the use of cameras and mobile technology, noting that images of pupils and children in EYFS should only be taken on school equipment.

6.5 Pupils

- Pupils should work with the College to ensure that all may enjoy a safe and productive environment.
- Pupils should have the confidence to report any concerns, either about themselves or others, to a member of staff.
- Pupils should not put themselves at risk online or in the public arena, following the guidance provided through personal, health and social education and through other elements of the educational process in the College.
- The College is committed to ensuring that pupils are aware of behaviour towards them that is not acceptable and how they can keep themselves safe and how to complain. All pupils know that we have a Designated Safeguarding Lead with responsibility for child protection and know who this is. We inform pupils to whom they might talk, both in and out of College, of their right to be listened to and heard, and of what steps can be taken to protect them from harm.
- The College is committed to ensuring there are opportunities in the College curriculum, for example through the Personal, Social, Health Education (PSHE) curriculum and by providing an age-related, comprehensive curriculum, for pupils to be taught about aspects of safeguarding in order to develop the knowledge and skills they need to recognise and stay safe from abuse, including online safety.

We do this by:

- ◆ Emphasizing the importance of preventative education with regard to sexual violence and sexual harassment;
- ◆ developing healthy relationships and awareness of domestic violence, bullying, child sexual exploitation, sexual orientation, gender-based violence, hate, relationship abuse, faith abuse and other forms of abuse;
- ◆ recognising and managing risks (including online) such as cyberbullying, online grooming for sexual exploitation and radicalization, and running away;
- ◆ enabling pupils to become safe and responsible users of new technologies and the impact of new technologies on sexual behavior for example, upskirting, sexting and accessing pornography;
- ◆ enabling pupils to develop knowledge, skills, and attitudes consistent with the promotion of the **Fundamental British Values** of democracy, the rule of law, individual liberty, mutual respect for and tolerance of those with different faiths and beliefs and for those without faith;
- ◆ recognising how pressure from others can affect their behaviour, including the risks of radicalisation to extremist behaviour;
- ◆ ensuring pupils have the opportunity to discuss controversial issues and develop tolerance and

- ◆ respect for others;
- ◆ raising awareness of child sexual exploitation, domestic abuse, so-called 'honour-based' abuse, female genital mutilation and forced marriage;
- ◆ making available appropriate local and online advice.

Additional aspects of safeguarding included in the curriculum are risks associated with:

- ◆ substance misuse;
 - ◆ online challenges, misinformation, and hoaxes;
 - ◆ knives, gangs, and serious violence;
 - ◆ mental health;
 - ◆ water, fire, roads, and railways.
- The College has updated the curriculum aspects of related policies to ensure that they are aligned to our Child Protection Policy. This includes the College's online safety, sex and relationships, substance misuse, anti-smoking, and anti-bullying policies.
 - The College recognises the importance of using age-appropriate curriculum resources and ensuring that there is a safe climate for learning which includes the setting of ground rules. Parents are welcome to view any resources and discuss any concerns they have over any curriculum content within our PSHE curriculum provision. Arrangements can be made by contacting Mia Cross (Prep School), Heather Ramsay (Senior School).
 - Training needs of staff are regularly reviewed to ensure that staff who are delivering safeguarding aspects of PSHE or online safety have the appropriate knowledge and skills.
 - The College monitors and evaluates the impact of the safeguarding taught curriculum provision through our College based monitoring and evaluation processes which include lesson observation, work scrutiny and feedback from pupils, staff, and parents.

6.6 Parents

- Parents must understand that, whilst they College will endeavour to involve them in matters relating to their children, the College may not, without proper authority to do so, relate the details or even fact of a disclosure to them: this will be the case when to do so may undermine the safety or well-being of a child: guidance is always sought from local children's services and/or the police on such occasions.
- Parents are expected to support the safeguarding work of the College including about keeping children safe online, cyberbullying, online challenges, misinformation, and hoaxes.
- Parents should follow any guidance given regarding the use of cameras and mobile technology when in the College or attending an event at the College.

7 TYPES AND SIGNS OF ABUSE

- 7.1** All staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.
- 7.2** **Abuse: a form of maltreatment of a child.** Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others Abuse can take place wholly online, or technology may be used to facilitate offline abuse. A child may be abused by an adult or adults or another child or children. The personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse: contextual safeguarding.
- 7.3** **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- 7.4** **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate

expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from 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.

- 7.5 Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening or not. 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. Sexual abuse can take place online, and technology can be used to facilitate 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. Sexual harassment and child-on-child sexual violence are species of sexual abuse and frequently have a gendered nature.
- 7.6 Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- 7.7** Further information is provided in Appendix 1 about abuse which may arise in contexts of domestic abuse, child sexual exploitation, child criminal exploitation including county lines, gangs, female genitalia mutilation (FGM), forced marriage, and honour-based abuse (HBA).
- 7.8** Further information about abuse within the context of radicalisation and extremism is provided in Appendix 2.
- 7.9** There are a number of warning indicators which might suggest that a child may be being abused or neglected. Some, but certainly not all the following signs might be indicators of abuse or neglect: children
- whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
 - with clothes which are ill-fitting and/or dirty;
 - with consistently poor hygiene;
 - who make strong efforts to avoid specific family members or friends, without an obvious reason;
 - who don't want to change clothes in front of others or participate in physical activities;
 - who are having problems at College, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
 - who talk about being left home alone, with inappropriate carers or with strangers;
 - who are regularly missing from College or education;
 - who are reluctant to go home after College;
 - with poor College attendance and punctuality, or who are consistently late being picked up;
 - who are dismissive and non-responsive to practitioners' concerns;
 - who have parents who collect their children from College when drunk, or under the influence of drugs;
 - who drink alcohol regularly from an early age;
 - who are concerned for younger siblings without explaining why;
 - who talk about running away;
 - who shy away from being touched or flinch at sudden movements.
- 7.10** Children at greater risk of harm include: those who need a social worker; those requiring mental health support; looked after children and previously looked after children.

7.11 Children with SEND are also more vulnerable and at greater risk of harm, this includes the risk of child on child (child-on-child) abuse.

7.12 Signs of Possible Child Abuse

It is important to remember that lists such as the one below is neither completely definitive nor exhaustive. The information in such lists has to be used in the context of the child's whole situation and in combination with a range of other information related to the child and his/her circumstances.

There can be an overlap between all the different forms of child abuse, and all or several can co-exist.

POSSIBLE SIGNS OF PHYSICAL ABUSE

- Unexplained injuries or burns, particularly if they are recurrent;
- Improbable excuses given to explain injuries;
- Refusal to discuss injuries;
- Untreated injuries, failure to report them;
- Excessive physical punishment;
- Arms and legs kept covered in hot weather;
- Fear of returning home;
- Aggression towards others;
- Running away;
- Fabricated symptoms of or deliberately induced illness in a child.

It is important to remember that injuries may have occurred for other reasons such as a genuine accident.

POSSIBLE SIGNS OF NEGLECT

- Constant hunger;
- Poor personal hygiene;
- Constant tiredness;
- Poor state of clothing;
- Frequent lateness or non-attendance at school;
- Untreated medical problems;
- Destructive tendencies;
- Low self-esteem;
- Neurotic behaviour; (e.g.: hair twisting, thumb-sucking, etc...)
- Compulsive stealing and scavenging;
- No social relationships.

POSSIBLE SIGNS OF EMOTIONAL ABUSE

- Low self-esteem
- Admission of punishment which appears excessive;
- Over reaction to mistakes;
- Sudden speech disorders;
- Fear of new situations;
- Neurotic behaviour; (e.g.: hair twisting, thumb-sucking, etc...)
- Self-mutilation;
- Compulsive stealing;
- Extremes of passivity or aggression;
- Running Away;
- Drug / solvent abuse;
- Compulsive stealing / scavenging;
- Emotional immaturity;

POSSIBLE SIGNS OF SEXUAL ABUSE

- Be chronically depressed;
- Be suicidal;
- Use drugs or drink to excess;
- Self-mutilate, show self-hatred;

- Have unexplained pregnancies;
- Experience memory loss;
- Become anorexic or bulimic;
- Run-away frequently;
- Be inappropriately seductive;
- Be fearful about certain people like relatives or friends;
- Not to be allowed to go out on dates or have friends round;
- Find excuses not to go home or to a particular place;
- Have recurring nightmares / be afraid of the dark;
- Be unable to concentrate, seem to be in a world of their own;
- Have a 'friend who has a problem' and then talk about the abuse of the friend;
- Have chronic ailments such as stomach pains and headaches;
- Sexually abuse a friend or sibling;
- Exhibit a sudden change in school/work habits, become truant;
- Be withdrawn, isolated or excessively worried;
- Have outbursts of anger or irritability;
- Be fearful of undressing for PE or games;
- Be sexually promiscuous;
- Fear of medical examinations;
- Inappropriate sexual language and/or behaviour.

8. ABUSE AND DISCLOSURES: GUIDANCE TO STAFF

- 8.1** All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to the likes of drug taking, alcohol abuse, deliberately missing education and sending nudes and semi-nudes, put children in danger.
- 8.2** Safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between children outside the College. All staff, but especially the DST should be considering the context within which such incidents/behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.
- 8.3** It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.
- 8.4** If a pupil talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the pupil know that they must pass the information on** – staff are not allowed to keep secrets. The point at which they tell the pupil this is a matter for professional judgement. If they jump in immediately the pupil may think that they do not want to listen, if left until the very end of the conversation, the pupil may feel that they have been misled into revealing more than they would have otherwise.
- 8.5** In some cases a disclosure may be indirect, e.g., through a friend of a pupil. Such disclosures should be taken just as seriously as direct disclosures: the DST should be informed immediately so that the pupil who is the subject of the disclosure may be seen immediately and kept safe.
- 8.6** If a pupil discloses to a member of staff some form of abuse (other than an allegation against a member of staff which is dealt with in section 10 of this policy), the member of staff concerned should adhere to the following procedure, noting the summary guidance in Appendix 9:
- Listen to all the pupil says sympathetically but without avowing belief in what is said.
 - Make a record of what is said either contemporaneously or as soon as possible afterwards: write up their conversation as soon as possible and submit to the DST with the concern. These notes should use the pupil's words and be included in the details of the concern section of the report and uploaded as an attachment to any online recording system. It will also include the **time, date, and place of the**

disclosure. It should be factual and differentiate between fact/ opinion/ interpretation. The more detail the better. The original notes must be passed to the DSL or DDSL for secure filing.

- Do not ask leading questions.
- Allow pupils to speak freely.
- Remain calm and not overreact – the pupil may stop talking if they feel they are upsetting their listener.
- Give reassuring nods or words of comfort – e.g. ‘I’m so sorry about this’, ‘I want to help’, ‘You are doing the right thing in talking to me’.
- Do not be afraid of silences – staff must remember how hard this must be for the pupil.
- Do not promise confidentiality.
- Avoid admonishing the child for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be the staff member’s way of being supportive but may be interpreted by the child to mean that they have done something wrong.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Do tell the pupil what happens next: who will be told.
- Notify a member of the DST immediately.
- Keep the pupil in a place of safety. Do not leave them alone.
- If the pupil needs medical attention, take them to a College nurse.
- Do not ask the pupil to reveal any part of their body not normally clothed even if they offer to do so.
- Do not discuss the disclosure with any person other than a member of the DST.
- Do not discuss the matter with the parents of the child: it is a matter for the DST guided by external agencies whether it is appropriate for parents to be informed.
- Do not attempt to resolve the matter in part of whole yourself: this is entirely a matter for the DST and external agencies.
- Remember you are not the Police or Social Services: please listen, record and report.
- Do seek support from the DST: receiving a disclosure may be stressful and disturbing.

Remember: Anyone may make a direct referral to local children’s services and/or the police.

8.7 Record Keeping

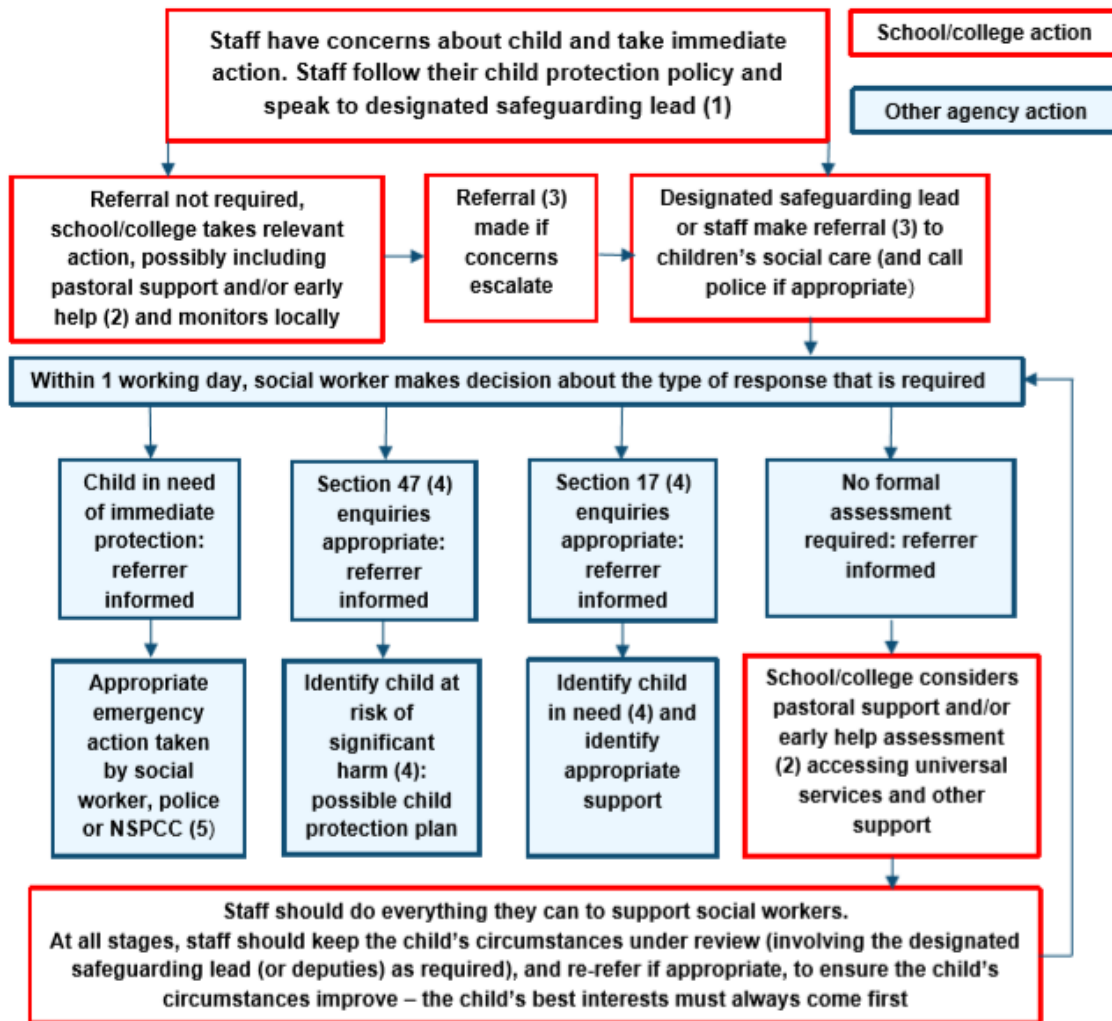
All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing. The information will be kept confidential and stored securely.

Records will include:

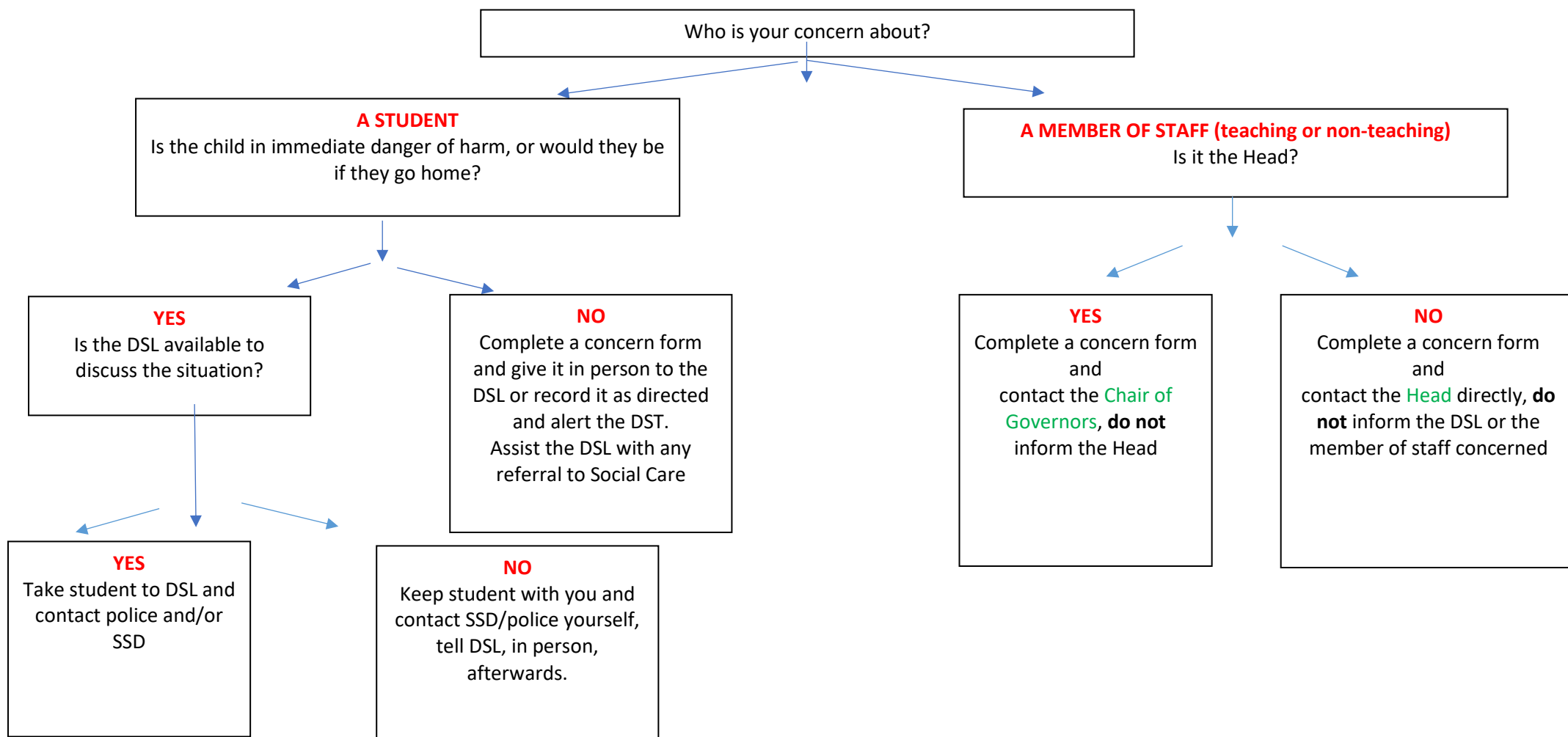
- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

The flow chart below from Keeping Children Safe in Education 2020 gives some guidance on what to do. The DST will contact the LA in case of a disclosure to seek guidance if there is the slightest doubt about a referral and will also seek advice from the LA/police before contacting parents about the referral.

Actions where there are concerns about a child



Scarborough College guide for staff - What to do if you have a concern about someone in College or there is a disclosure made to you?



9 CHILD-ON-CHILD ABUSE

- 9.1** All staff should be aware that safeguarding issues can manifest themselves as children can abuse other children (now called child-on-child abuse and previously referred to as peer-on peer-abuse), This can happen both inside and outside of College and online. This abuse frequently has a gendered nature, girls are more likely to be victims and boys' perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously. Staff should recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.
- 9.2** All staff should understand, that even if there are no reports in the College, it does not mean it is not happening, it may be the case that it is just not being reported. If staff have **any** concerns regarding child-on-child abuse, they should report these via the safeguarding procedure and discuss with the DST.
- 9.3** **A child-on-child concern will be treated as a child protection concern when there is reasonable cause to believe that a child is suffering or likely to suffer significant harm which may warrant referral to an external agency.**
- 9.4** All staff should understand the importance of challenging inappropriate behaviours between peers that are abusive in nature They should be aware that abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Downplaying certain behaviours, e.g., dismissing sexual harassment as 'just banter', can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
- 9.5** Child-on-child abuse is most likely to include, but may not be limited to:
- bullying (including cyberbullying, prejudice-based and discriminatory bullying), noting that bullying including cyber-bullying which causes or threatens serious harm is potentially a child protection matter;
 - harmful online challenges;
 - abuse within intimate personal relationships between peers;
 - 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 nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
 - upskirting; a criminal offence which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and could include an online element).
- 9.6** The College will take all reasonable measures to minimise the risk of child-on-child abuse, including through PSHE, relationship and sex education programmes, and specific actions promoted through the College's pupil behaviour and anti-bullying programmes.

Particular attention will be paid to the protected characteristics of students under the Equality Act 2010, namely: disability; gender reassignment; race; religion or belief; sex; sexual orientation. Pupils will be given information about how to report instances of child-on-child abuse in lessons and information will be displayed around the site.

- 9.7** Members of staff are required to report as soon as possible and certainly within one working day instances or suspected instances of child-on-child abuse to the pastoral team and/or DST.
- 9.8** Alleged instances of child-on-child abuse will be investigated by either the DST or by a member of the College's pastoral staff. If there is any doubt at all about the seriousness of the alleged abuse, especially but not only where this involves sexual violence or abuse, the DST will contact the relevant local authority for guidance before proceeding. Records of the investigation, including any actions taken as a result of the investigation, will be maintained by the DST. Disciplinary action against any pupil will be in accord with the College's pupil behaviour policy. Appropriate support will be provided for the perpetrator as well as the victim. A flowchart of the possible pathways is in Appendix 9. The NSPCC helpline 'Report abuse in education' 0800 163 663 or help@nspcc.org.uk, can be shared with the student/staff members.
- 9.9** The College policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g., cyber, racist, homophobic, and gender-related bullying. A record of known and alleged bullying incidents is kept.
- 9.10** All staff are made aware that children with SEND and/or differences or perceived differences are more susceptible to being bullied and victims of child abuse.
- 9.11** The College's anti-bullying policy promotes a climate with zero tolerance to bullying and emphasises the fact that any reliance on a defence by the bully of "banter, just a part of growing up, or just a laugh or a bit of fun" is unacceptable.
- 9.12** The College will provide, through the pastoral team, appropriate support for both the victims and perpetrators of child-on-child abuse. Support may include referral to the College's pupil counsellor or to children's services for early help. The College may also devise a pupil welfare risk assessment and add them to our internal Pastoral Watch list, so that key staff can offer the correct bespoke support. The DSL will listen to the child's wishes.
- 9.13 Sending nudes and semi-nudes.**
(Amended after the release of the UKCIS document 'Sharing nudes and semi-nudes. Advice for education settings working with children and young people. Responding to incidents and safeguarding children and young people December 2020).

[The UKCIS advice document](#) uses the term 'sharing nudes and semi-nudes' to mean the sending or posting of nude or semi-nude images, video, or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve the sharing between devices via services like Apple's AirDrop which works offline.

- 9.14** Many professionals may refer to 'nudes and semi-nudes' as:
- youth produced sexual imagery or 'youth involved' sexual imagery;
 - indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18;
 - 'sexting'. Many adults use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images;
 - Imaged-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes.

See Appendix 11 – the UKCIS document ‘Sharing nudes and semi-nudes: how to respond to an incident’ should be read by all staff.

9.15 All incidents involving nude and semi-nude images will be responded to as follows:

- The incident will be referred to the DSL immediately and the DSL will hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the young people involved;
- Parents will be informed at an early stage and involved in the process, unless there is good reason to believe that involving parents would put the young person at risk of harm;
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm a referral will be made to children’s social care and/or the police immediately in accordance with this policy.

In some instances, it may be necessary to refer the matter to the police. Once a report is made to the police, the report must be recorded, and the police will investigate. This may include seizure of devices and interviews with the young people involved.

10 CHILDREN IN NEED OF EARLY SUPPORT AND INTERVENTION

10.1 Early help means providing support as soon as a problem emerges at any point in a child’s life. Providing early help is more effective in promoting the welfare of children than reacting later. A child in need is defined as a child who is unlikely to achieve or maintain a reasonable level of health or development; or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

10.2 Effective early help relies upon local agencies working together to identify children and families who would benefit from early help, to undertake an assessment of the need for early help, such as the Common Assessment Framework (CAF) or Early Help Assessment (EHA), and to provide targeted early help services to improve the outcomes for the child and prevent needs escalating to a point where intervention from children’s services would be needed.

10.3 Inter-agency assessments should take place when a child and family would benefit from coordinated support from more than one agency (e.g. education, health, housing, police). The assessment should be undertaken by a lead professional who should provide support to the child and family and coordinate the delivery of support services. The lead professional could be a teacher, family support worker, health visitor or GP and the decision about who should be the lead professional should be informed by the child and their family. Examples of support services include family and parenting programmes, assistance with health issues and help for problems relating to drugs and alcohol.

10.4 For early help assessment to be effective:

- the assessment should be undertaken with the agreement of the child and their parents and should involve the child and the family as well as the professionals working with them.
- professionals should be able to discuss concerns they may have about a child and family with a social worker in the local authority.

10.5 If consent is not given for an early help assessment, the DST should consider how the needs of the child might be met. If at any time it is considered that the child may be a child in need or that the child has suffered significant harm or is likely to do so, a referral to the local authority’s children’s service should be made immediately.

- 10.6** Staff should discuss emerging problems and early help requirements with the DST. If early help is appropriate, the DST will generally lead on liaising with other agencies and setting up an inter-agency assessment. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional as appropriate.
- 10.7** Any such cases should be kept under constant review and consideration given to a referral to local authority's children's service for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.
- 10.8** The DST is responsible for maintaining effective records of all such cases.
- 10.9** Further information relating to early help and interventions is provided in Appendix 3.

11 PUPILS WITH SPECIAL EDUCATIONAL NEEDS AND/OR DISABILITIES AND/OR PHYSICAL HEALTH ISSUES.

- 11.1** We recognise that, statistically, children with special educational needs and/or disabilities or certain health conditions are most vulnerable to abuse and can face additional safeguarding challenges. College staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse, including child-on-child abuse.
- 11.2** Staff should be aware that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:
- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
 - these children being more prone to peer group isolation or bullying (including prejudice-based and discriminatory bullying) than other children;
 - the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
 - communication barriers and difficulties in managing or reporting these challenges.
- 11.2** The College has pupils with emotional and behavioural difficulties and/or challenging behaviours. The College will support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self-esteem as part of an overall behaviour support plan agreed with parents/carers.
- 11.3** As part of the PSHE curriculum staff will teach young people personal safety skills in an age-appropriate manner. Pupils will be taught on how to keep themselves safe, peer pressure and appropriate relationships.
- 11.4** The College has pupils who may have learning difficulties and we are aware that they are vulnerable to abuse because they may be unable to express themselves to others. Instead, such pupils may exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the child.
- 11.5** Where necessary, the College will provide additional training to staff in the use of alternate communication systems. Supervision by senior managers will be vigilant to create a protective ethos around the pupil.
- 11.6** We promote high standards of practice, including ensuring that children with disabilities know how to raise concerns, and have access to a range of adults with whom they can communicate.

12 ALLEGATIONS AGAINST AND LOW-LEVEL CONCERNS REGARDING STAFF.

- 12.1** At Scarborough College we recognise the possibility that adults working in the College may harm children. This includes governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the College should be taken to the Head without delay; any concerns about the Head should go to the Chair of Governors. Contact details are in section 2 of this document. Concerns may come from various sources, e.g., a suspicion; complaint; or disclosure made by the child, parent or other adult within or outside the organisation; or as the result of vetting checks undertaken.
- 12.2** All College staff (which always includes supply staff and contractors for safeguarding purposes) and volunteers should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults. Particular care should be taken by those teaching on a one-to-one basis, by those involved in the personal care of children, and by those such as musicians and physical education staff who may come into physical contact in the course of educational demonstrations with pupils.
- 12.3** All staff and volunteers should have read and understand the College's staff behaviour and conduct policy.
- 12.4** Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers, will be given at induction, and reinforced at regular intervals. Particular note should be taken of the fact that communications between pupils and adults, by whatever method, are transparent and take place within clear and explicit professional boundaries and are open to scrutiny. Should a member of staff be required to use reasonable physical restraint on any occasion, this must be reported immediately to the Head or in their absence a member of the DST: a written record is maintained of such instances by the Head.
- 12.5** KCSIE September 2023 sets out two levels of allegation/concern:

1. Allegations that may meet the harms threshold.

It is an allegation if the person has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicated he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

2. Allegations/concerns that do not meet the harms threshold (referred to as 'low-level concerns').

The term 'low-level concern' does not mean that it is insignificant, it means that it does not meet the criteria in 1. above.

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 College may have acted in a way that:

- is inconsistent with the staff code of conduct, including appropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider referral to the LADO.

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

- being overfriendly with children;
- having favourites;
- taking photographs of children on their personal mobile phone or other device;
- engaging with a child in a one-on-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating, or offensive language.

We believe that low-level concerns should not be ignored or discounted; we seek to

- encourage an open and transparent culture;
- enable us to identify concerning, problematic, or inappropriate behaviour early;
- minimise the risk of abuse; and
- ensure that adults working in or on behalf of the college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution;
- ensure that we learn lessons from allegations in all cases including those not proven or unsubstantiated.

REPORTING ALLEGATIONS – LEVEL 1 – ALLEGATIONS THAT MEET THE THRESHOLD.

- 12.6** If a pupil makes an allegation against a member of staff other than the Head, or information is received which suggests that a member of staff may be unsuitable to work with children, the member of staff receiving the allegation or being made aware of the information will immediately inform the Head without informing the member of staff who is the subject of the allegation. Any children involved will be given the necessary welfare support.
- 12.7** Any person receiving an allegation must not ask leading questions nor guarantee confidentiality to the person making the allegation and must make a written record of what is said by the person making the allegation either contemporaneously or as soon as possible afterwards. This record must be handed to the person stipulated in 12.8 or 12.9 below. However, any person may make a referral to the local authority and/or police in such cases. The matter should not be discussed with others.
- 12.8** The Head on all such occasions has to decide whether the concern is an allegation or a low-level concern. The term low-level concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO). With an allegation, the Head will discuss the content of the allegation with the LADO and if a crime is alleged, with the police at the earliest opportunity and within one working day of receiving the allegation.
- 12.9** If the concern is about the Head, then this must be referred to the Chair of Governors. With an allegation the Chair of Governors will immediately (and within one working day) consult the LADO and, if a crime is alleged, with the police without notifying the Head first. In the absence of the Chair of Governors, the matter should be referred directly to the LADO, again without notifying the Head first.
- 12.10** The College will follow the local authority guidance for managing allegations against staff and will proceed only when given permission by the local authority and/or police to do so.
- 12.11** Suspension of the member of staff, excluding the Head, against whom an allegation has been made, needs careful consideration, and the Head will seek the advice of the LADO and if appropriate the College's HR and Legal Consultants in making this decision.

- 12.12** In the event of an allegation against the Head, the decision to suspend will be made by the Chair of Governors in consultation with the LADO and if appropriate the College's HR and Legal Consultants in making this decision.
- 12.13** The College will ensure that any disciplinary proceedings against staff relating to child protection matters are concluded in full even when the member of staff is no longer employed at the College and that notification of any concerns is made to the DBS, in accordance with the legal requirement on the College to do so, with consideration being given to referral to the TRA, and included in references where applicable.
- 12.14** Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.
- 12.15** Consideration will be given to the needs of the child and a recognition that a child may make an allegation against an innocent party because they are too afraid to name the real perpetrator. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.
- 12.16** The College will ensure that all staff are aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents/carers as advised within the staff behaviour code of conduct. As part of the Induction process, all staff will receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all children, especially those with a disability or who are vulnerable.
- 12.17** The College will ensure that staff and volunteers are aware that sexual relationships with pupils aged under 18 (or any pupil classified as a vulnerable adult) are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Trust). Sexual relationships between a member of staff and any pupil aged 18 and over constitute gross professional misconduct and will result in disciplinary proceedings.
- 12.18** Should the College employ supply staff from an agency, the College will inform the agency of its process for managing allegations: the College and not the agency is responsible for reporting allegations to the local authority and/or police.

REPORTING ALLEGATIONS – LEVEL 2 – LOW LEVEL CONCERNS.

- 12.19** Low-level concerns about a member of staff should be reported to the Head. Where a low-level concern is raised about the Head, it should be shared with the Chair of Governors.
- 12.20** Staff should self-refer if they find themselves in a situation that could be misinterpreted, which might appear compromising to others, and/or on reflection they believe they have behaved in a such a way that they consider falls below the expected professional standards.
- 12.21** If the concern has been raised by a third party, the Head will collect as much evidence as possible by speaking;
- directly to the person who raised the concern, unless it has been raised anonymously;
 - to the individual involved and any witnesses.
- 12.22** If the low-level concern is about a person employed by a supply agency or a contractor, this concern should be shared with the headteacher and recorded in accordance with the College's staff code of conduct policy which contains guidance on low-level concerns. Their employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

- 12.23** Information collected will help the Head categorise the type of behaviour and determine what further action needs to be taken.

Low-level concerns will be recorded in writing, including:

- name of the individual sharing their concerns;
- details of the concern;
- context in which the concern arose;
- action taken;
- rationale for decisions and action taken;

If the person sharing the concern wishes to remain anonymous this should be respected as far as reasonably possible.

- 12.24** Records will be kept confidential, held securely, and comply with the Data Protection Act 2018. Records will be kept at least until the individual leaves the employment of Scarborough College.

- 12.25** Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation (level 1), then the matter will be referred to the LADO. The records' review may identify wider cultural issues within the College that enabled the behaviour to occur. This may lead to revision of policies and processes, or extra training would be delivered to minimise the risk of it happening again.

13 THE PREVENT DUTY

- 13.1** The College has due regard to 'the need to prevent people from being drawn into terrorism' in line with the Counterterrorism and Security Act 2015 and Prevent Duty guidance.
- 13.2** The DSL has received training about the Prevent Duty and tackling extremism and other members of staff normally complete an online general awareness training module on Prevent that includes information on when it is appropriate to make a referral to Channel on a schedule to be determined in consultation with the local children's services.
- 13.3** Staff are aware of the increased risk of online radicalisation. Suitable IT filtering/screening and monitoring is in place on the College's computer system. We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.
- 13.4** Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should report these concerns via the safeguarding channels and discuss with the DST.
- 13.5** Scarborough College is committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the College's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just, and civil society.
- 13.6** Visiting speakers will be vetted so that the College can be satisfied that the information provided by speakers will be aligned to the ethos and values of the College and to British values.
- 13.7** Any concerns in relation to possible radicalisation will be discussed with a pupil's parents unless there is a specific reason to believe that to do so would put the pupil at risk.

- 13.8** Staff should be alert to changes in children's behaviour, which could indicate that they may need help or protection. Further details about radicalisation are provided in Appendix 2.
- 13.9** Further information relating to extremism and the prevent duty may be found in Appendix 2.
- 13.10** Prevent is supported by Channel which is a voluntary, confidential programme which provides support to individuals who are vulnerable to being drawn into any form of terrorism. Further details about Channel are provided in the statutory guidance for Channel partners: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/964567/6.6271_HO_HMG_Channel_Duty_Guidance_v14_Web.pdf

14 BOARDING AND BOARDERS.

- 14.1** The College has due regard to the safeguarding requirements of the revised National Minimum Standards for Boarding (September 2022) and to the recommendations of the Independent Inquiry into Child Sex Abuse (IICSA) (March 2022).
- 14.2** IICSA noted that sexual abuse can and does occur;
- in all types of schools;
 - to all ages of children.
- And so, it recommended that schools must go beyond the acceptance that 'it could happen here' to the belief that 'it probably is happening here'.
- 14.3** The boarding environment is regarded by IICSA as a high risk for grooming and abuse by adults working at the school as well as providing opportunities for child-on-child sex abuse. Day pupils at boarding schools are also judged to be vulnerable to these risks. Overseas boarders may be especially vulnerable not just at school but when staying with their educational guardians for whom there is no convincing system of checks. The current statutory guidance and independent school standards are judged to be inadequate in these regards.
- 14.4** The Inquiry maintained that there is no simple general solution to the problem of child sexual abuse (CSA) in schools. Instead, a series of incremental changes are proposed most of which require government action. However, several specific actions for individual schools are recommended, which the College fully embraces. Accordingly, we shall
- report any allegation of child sexual abuse to the inspectorate as well as to the DBS and TRA;
 - ensure that the Head, DSL, and members of the DS team (and DSG) are trained to the highest level;
 - ensure that RSE for all pupils including those with SEND is as effective as possible; and
 - ensure that pre-appointment checks and supervision of volunteers are as effective as possible.
- 14.5** We support and embrace the key substantive changes made to the National Minimum Standards for boarding:
- the focus upon good rather than suitable or adequate provision (e.g. accommodation, facilities, food); how inspectors will decide between 'good' and suitable/adequate' is yet to be seen;
 - the central importance of the welfare and wellbeing of boarders;
 - the need to ensure that our policies reflect the interests and needs of boarders;
 - the need to monitor any lodgings, host families and guardians rigorously.

14.6 The College shall carry out an annual audit of boarding which shall be submitted to the Governors: boarding pupils will be invited to provide feedback to Governors on the experiences of boarding especially as it relates to their wellbeing.

14.7 Accordingly, the following guidelines amongst others will be followed:

- The **wellbeing of boarders** will be a primary concern.
- The risks associated with the **potential impact of sexual violence and sexual harassment** in the boarding environment will be considered
- Any incidents of sexual harassment and sexual violence within the boarding environment will be **recorded as boarding incidents**.
- Staff and boarders of all kinds and needs should know **what to do in an emergency including at night**.
- We shall ensure that there are **clear arrangements for arrival at and departure** from school.
- We shall ensure that **boarders know how to raise concerns** and staff must know how to respond when this happens.
- **Our behaviour and bullying policies** reference behaviour and bullying in boarding accommodation.
- Any incidents of bullying or misconduct within the boarding environment are **recorded as boarding incidents**.
- In accordance with our **RSE policy** we promote good relationships amongst boarders.
- We take appropriate steps to ensure that **guardians are suitable and promote the welfare of boarders**.
- We do not appoint school staff should as educational guardians for **boarders**.
- There will be termly checks in place for any **lodgings and host families** and DBS checks on all over 16s residing in such accommodation which will be good not merely suitable.

15 RELATED POLICIES

There are several College policies, published through the College website, all of which have a direct relationship to safeguarding:

- 15.1 Recruitment and Selection:** this sets out approach taken to required pre-appointment checks and describes how records are maintained. Checks for staff in paid employment will normally include identity, relevant qualifications, DBS and barred list, right to work in the UK, references, medical, detailed employment history. Additional checks are in place for those who have worked overseas.
- 15.2 Anti-bullying:** this sets out the College's approach to bullying in all its forms, bullying which causes or threatens serious harm to a pupil is potentially a child protection matter. Aspects of bullying are noted under child-on-child abuse.
- 15.3 Pupil behaviour and sanctions:** this sets out the College expectations for high levels of pupil conduct and describes how the College seeks to achieve these.
- 15.4 Code of conduct:** this provides guidance to staff on how they should conduct themselves in their relationships with pupils and advice on the use of social media.
- 15.5 Acceptable use of IT and Online Safety:** this sets out a code of conduct for users of the College's IT systems, which are filtered and monitored centrally and includes guidance on 3G/4G/5G technologies.
- 15.6 Whistleblowing:** this provides guidance for anyone wishing to draw the attention of the senior leadership, the Head, or the governors any problematic feature of safeguarding either in general or with regard to an individual case.
- 15.7 Health and safety and educational trips and visits:** these provide guidance to staff on maintaining a safe environment within the College and when taking pupils on external trips and visits.
- 15.8 PSHE:** including guidance on **Relationship and Sex Education**.
- 15.9 Attendance and registration policy:** this includes information about children missing education.

APPENDIX 1A: TYPES OF ABUSE: SPECIFIC SAFEGUARDING ISSUES AND SIGNS AND INDICATORS OF ABUSE

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

Specific Safeguarding Issues:

Domestic abuse:

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- physical or sexual abuse;
- violent or threatening behaviour;
- controlling or coercive behaviour;
- economic abuse (adverse effect of the victim to acquire, use or maintain money other property; or obtain goods or services); and
- psychological, emotional, or other abuse.

People are 'personally connected' when they are, or have been, married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibilities for the same child or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Children who witness **domestic abuse** may, amongst other indicators:

- become aggressive;
- display anti-social behaviour;
- demonstrate overnight incontinence (bed-wetting);
- suffer from depression or anxiety; and not do as well at College due to difficulties at home or disruption of moving to and from refuges.

Operation Encompass

Operation Encompass is a national system operating in the majority of police forces across England. When the police have been called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (the DSL) at Scarborough College. This ensures that the College has up to date information about the child's circumstances and can offer support to the child according to their needs.

National Domestic Abuse Helpline (24 hours, free and in confidence)

0808 2000 247

Child Sexual Exploitation, Child Criminal Exploitation and County Lines

Child Sexual Exploitation (CSE): Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. This imbalance may arise from a range of factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic and other resources. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Potential vulnerabilities

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these vulnerabilities.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involving adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories);
- Sexual identity.

Child Criminal Exploitation (CCE): Child Criminal Exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator, and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can occur through the use of technology. Examples of CCE include being coerced into moving drugs across the country (county lines), being forced to shoplift or being forced to threaten other young people.

Again, as with CSE, this imbalance may arise from a range of factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic and other resources.

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 (and store) drugs and money. Gangs establish a base in the market

location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as 'cuckooing'. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims, it may involve force and/or enticement-based methods of compliance. County Lines Exploitation can still be exploitation even if the activity appears consensual. Children can be targeted and recruited into county lines in a number of locations including Colleges. Children are also increasingly being targeted and recruited online using social media. The perpetrators may be individuals or groups, males or females and young people or adults and it is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Children can easily become trapped by this type of exploitation as county lines gangs create drugs 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 College) when the victim may have been trafficked for the purpose of transporting drugs.

Child Sexual Exploitation – indicators of CSE

Children rarely self-report child sexual exploitation so it is important that practitioners are aware of potential indicators of risk, including:

- acquisition of money, clothes, mobile phones etc. without plausible explanation;
- gang-association and/or isolation from peers/social networks;
- association with other young people involved in exploitation;
- exclusion or unexplained absences from College, Prep School or work;
- leaving home/care without explanation and persistently going missing or returning late;
- excessive receipt of texts/phone calls;
- returning home under the influence of or otherwise misusing drugs/alcohol;
- inappropriate sexualised behaviour for age/sexually transmitted infections or pregnancy;
- evidence of/suspicions of physical or sexual assault;
- relationships with controlling or significantly older individuals or groups;
- multiple callers (unknown adults or peers);
- frequenting areas known for sex work;
- concerning use of internet or other social media;
- increasing secretiveness around behaviours; and
- self-harm or significant changes in emotional well-being.

Criminal exploitation of children and vulnerable adults: County Lines guidance – indicators of CCE

Some indicators of involvement in serious violence and county lines and criminal exploitation are listed below, with those at the top of particular concern:

- persistently going missing from College or home and/or being found out-of-area;
- unexplained acquisition of money, clothes, or mobile phones;
- excessive receipt of texts and/or phone calls;
- references to gangs;
- association with other young people involved in exploitation;
- relationships with controlling/older individuals or groups;
- returning home under the influence of or otherwise misusing drugs/alcohol;
- going missing from home / care without explanation or regularly coming home late;
- children who regularly miss College or education or do not take part in education;
- suspicion of physical assault / unexplained injuries;
- parental concerns;

- carrying weapons;
- significant decline in College results / performance;
- gang association or isolation from peers or social networks;
- self-harm; and/or
- significant changes in emotional well-being.

Indicators of county lines involvement

Many of the indicators of CSE and CCE may be applicable to where children are involved in county lines. Some additional indicators are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g., knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

APPENDIX 1B: FABRICATED AND INDUCED ILLNESS, FGM, FORCED MARRIAGE, HBA

Fabricated or Induced Illness is a condition whereby a child suffers harm through the deliberate action of her/his main carer, and which is attributed by the adult to another cause. There are four main ways of the carer fabricating or inducing illness in a child:

- Fabrication of signs and symptoms, including fabrication of past medical history
- Fabrication of signs and symptoms and falsification of hospital charts, records, letters and documents and specimens of bodily fluids
- Exaggeration of symptoms/real problems. This may lead to unnecessary investigations, treatment and/or special equipment being provided;
- Induction of illness by a variety of means.

Harm to the child may be caused through unnecessary or invasive medical treatment, which may be harmful and possibly dangerous, based on symptoms that are falsely described or deliberately manufactured by the carer, and lack independent corroboration.

In cases of suspected Fabricated and Induced Illness the College will work closely with other agencies to ensure information is shared appropriately.

Where a child has suffered, or is likely to suffer, significant harm, the College will make a referral to Children's Social Care/the MASH.

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of external female genitalia or other injury of the female genital organs. It is illegal in the UK and constitutes a form of child abuse with long-lasting harmful consequences. FGM is internationally recognised as a violation of human rights of girls and women, and it is essential that staff are aware of certain practices and the need to look for signs, symptoms, and other indicators of FGM. It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

FGM typically takes place between birth and around 15 years old (although it can occur later); however, it is believed that the majority of cases happen between the ages of 5 and 8. Staff should not assume that FGM only happens outside the UK.

There is a specific legal duty on teachers. The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In Colleges this will usually come from a disclosure (unlike in the medical profession where an observation may have been made).

Teachers must personally and immediately report to the police where they discover that an act of FGM appears to have been carried out and discuss any such cases with the DSL and children's services. By law, teachers who fail to report such cases will face disciplinary sanctions.

If a girl is considered to be at risk or there is a suspicion that FGM may be going to take place you should report this using the usual safeguarding reporting process.

Types of procedure include:

- Clitoridectomy - partial/total removal of clitoris;
- Excision - partial/total removal of clitoris and labia minora;
- Infibulation - entrance to vagina is narrowed by repositioning the inner/outer labia.

Other procedures that may include pricking, piercing, incising, cauterising, and scraping the genital area.

Beliefs underpinning FGM include:

- FGM brings status/respect to the girl – social acceptance for marriage;
- Preserves a girl's virginity;
- Part of being a woman / rite of passage;
- Upholds family honour;
- Cleanses and purifies the girl;
- Gives a sense of belonging to the community;
- Fulfils a religious requirement;
- Perpetuates a custom/tradition;
- Helps girls be clean / hygienic;
- Cosmetically desirable;
- Makes childbirth easier.

Circumstances and occurrences (risk factors) that may indicate that FGM may take place:

- Low level of integration into UK society;
- Child talking about getting ready for a special ceremony;
- Visiting a female elder from the country of origin;
- Family taking a long trip abroad/holiday to the country of origin/at-risk country;
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria and Eritrea, as well as non-African communities including Yemen, Afghanistan, Kurdistan, Indonesia and Pakistan);
- Knowledge that the child's mother or sibling has undergone FGM;
- Child talks about going abroad to be 'cut' or to prepare for marriage, or a 'special procedure' to become a woman;
- Girls who are withdrawn from PSHE.

Signs that may indicate a child has undergone FGM:

- Prolonged absence from College and other activities;
- Behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued;
- Spending long periods of time away from the classroom with bladder or menstrual problems;
- Spending longer than normal in the bathroom or toilet due to difficulties urinating;
- Finding it difficult to walk, stand or sit still and looking uncomfortable;
- Complaining about pain between the legs;
- Mentioning something somebody did to them that they are not allowed to talk about;
- Secretive behaviour, including isolating themselves from their social group. Reluctance to take part in physical activity;
- Repeated urinary tract infections, menstrual or stomach problems;
- Reluctance to undergo normal medical examinations;
- Disclosure.

Actions

THE 'ONE CHANCE' RULE action must be taken without delay: inform the police and make a referral through the DST or direct to local authority children's services.

- If staff have a concern regarding a girl that might be at risk of FGM, they should treat the situation as a safeguarding concern and follow the College's safeguarding procedures, discussing the issue with the DSL and liaising with police and children's social care immediately.
- It is mandatory for teachers to report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss such a case with the College's DSL and involve children's social care as appropriate.

Forced Marriage: a forced marriage is when someone is made to marry another person who they don't want to. Forced marriages can happen in secret and can also be planned by parents, family or religious leaders. It may involve physical abuse, sexual abuse or emotional abuse. A forced marriage is different from an arranged marriage. In an arranged marriage, people have a choice about whether they get married or not. Arranged marriages are a cultural tradition for many people, but forced marriages are an abuse of human rights.

Forced marriage is against the law in the UK and any concern that a child or young person may be being forced into marriage should be responded to as a child protection concern and referred, without delay, to the local authority children's services and social care.

Prevention: the College plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

Staff can contact the Forced Marriage Unit for advice or information:

Tel: 020 7008 0151 email: fmufco.gov.uk

Honour-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community. It may include but is not restricted to FGM, forced marriage and practices such as breast ironing. Abuse often involves a wider network of family or community pressure and can include multiple perpetrators. Children may become entangled in inter-family or other disputes which may involve some form of punitive violent action or non-violent abuse against a member of the child's family or the child themselves.

There have been cases of acid attacks and arson as well as murder. Staff should be vigilant and report any suspicions of a child being at risk of or already having suffered HBA to the DST without delay.

APPENDIX 2: PREVENTING RADICALISATION

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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 must be designed to influence the government or to intimidate the public and is made for the purpose of advancing political, religious, or ideological cause.

Indicators of vulnerability to radicalisation

Identity Crisis - Distance from cultural/ religious heritage and uncomfortable with their place in the society around them.

Personal Crisis – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.

Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.

Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life.

Criminality – Experiences of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups.

Access to extremism / extremist influences

- Is there reason to believe that the child/young person associates with those known to be involved in extremism - either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate? (e.g., the child/young person is the partner, spouse, friend or family member of someone believed to be linked with extremist activity)
- Does the child/young person frequent, or is there evidence to suggest that they are accessing the internet for the purpose of extremist activity? (e.g., Use of closed network groups, access to or distribution of extremist material, contact associates covertly via Skype/email etc.)
- Is there reason to believe that the child/young person has been or is likely to be involved with extremist/military training camps/locations?
- Is the child/young person known to have possessed or is actively seeking to possess and/or distribute extremist literature/other media material likely to incite racial/religious hatred or acts of violence?
- Does the child/young person sympathise with, or support illegal/illicit groups e.g., propaganda distribution, fundraising and attendance at meetings?

- Does the child/young person support groups with links to extremist activity but not illegal/illicit e.g., propaganda distribution, fundraising, and attendance at meetings?

Experiences, Behaviours and Influences

- Has the child/ young person encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political, or religious influence on the child/young person from within or outside UK?
- Have international events in areas of conflict and civil unrest had a personal impact on the child/young person resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e., images of children dying) and it is important to differentiate them from those that sympathise with or support extremist activity.
- Has there been a significant shift in the child/young person's behaviour or outward appearance that suggests a new social/political or religious influence?
- Has the child/young person come into conflict with family over religious beliefs/lifestyle/dress choices?
- Does the child/young person vocally support terrorist attacks; either verbally or in their written work?
- Has the child/young person witnessed or been the perpetrator/victim of racial or religious hate crime or sectarianism?

Travel

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?
- Has the child/young person travelled for extended periods of time to international locations known to be associated with extremism?
- Has the child/young person employed any methods to disguise their true identity? Has the child/young person used documents or cover to support this?

Social Factors

- Does the child/young person have experience of poverty, disadvantage, discrimination, or social exclusion?
- Does the child/young person experience a lack of meaningful employment appropriate to their skills?
- Does the child/young person display a lack of affinity or understanding for others, or social isolation from peer groups?
- Does the child/young person demonstrate identity conflict and confusion normally associated with youth development?
- Does the child/young person have any learning difficulties/mental health support needs?
- Does the child/young person demonstrate a simplistic or flawed understanding of religion or politics?
- Does the child/young person have a history of crime, including episodes in prison?
- Is the child/young person a foreign national, refugee or awaiting a decision on their immigration/national status?
- Does the child/young person have insecure, conflicted, or absent family relationships?
- Has the child/young person experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other in the child/young person's life has extremist view or sympathies?

More critical risk factors could include:

- Being in contact with extremist recruiters;
- Articulating support for extremist causes or leaders;
- Accessing extremist websites, especially those with a social networking element;
- Possessing extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining extremist organisations, making remarks or comments about being at extremist events or rallies outside College;
- Intolerance of difference, including faith, culture, gender, race, or sexuality;
- Graffiti, art work or writing that displays extremist themes;
- Attempts to impose extremist views or practices on others;
- Verbalising anti-Western or anti-British views;
- Significant changes to appearance and/or behaviour, secretive behaviour.

If staff have any concerns, they should follow the College safeguarding procedures and report to the DST.

APPENDIX 3: CHILDREN ABSENT FROM EDUCATION (CAE)

All children of College age, regardless of their circumstances, are entitled to full-time education which is suitable to their age, ability, aptitude, and any special educational needs they may have.

Staff need to be made aware that pupils who are absent, as well as missing, from education can be a warning sign of a range of safeguarding concerns including sexual abuse, sexual exploitation or child criminal exploitation. KCSiE (2023) calls for a robust response is needed for those children persistently absent from education.

The College recognises that some pupils are at particular risk of missing education e.g. pupils at risk of harm and abuse, GRT (Gypsy, Roma and Traveller) families, children of service personnel, missing children or runaways, children supervised by the Youth Justice Service and children of immigrant families. As indicated in Keeping Children Safe in Education, 'a child going missing from education is a potential indicator of abuse or neglect'. All staff should be aware that children going missing, particularly repeatedly, may act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect (potentially sexual abuse or child criminal exploitation). It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or forced marriage. Early intervention is necessary to identify any underlying safeguarding risk and to help prevent the risks of the child going missing in future.

Staff working within the College know and implement the College's policy on Missing Children, actively search for children who are missing, including working with the police where appropriate. Any child subject to a Multi-Agency Child Protection Plan who is missing without satisfactory explanation will be reported to their Key Social Worker as soon as possible and within two days in any case.

Staff will monitor pupils' attendance through their daily register and will inform senior staff who in turn will be in touch with the local children's services for pupils who are regularly absent from College or have missed 10 school days or more without permission.

The College will notify the local authority when a pupil of school age is to be removed from the College roll when they:

- leave the College to be home educated;
- move away from the College's location;

- remain medically unfit beyond compulsory College age;
- are in custody for four months or more (and will not return to College afterwards); or
- are permanently excluded.

We will ensure that pupils who are expected to attend the College but fail to take up their place will be referred to the local authority.

When a pupil leaves the College, wherever possible, we will record the name of the pupil's new school and their expected start date.

The College will monitor attendance carefully and address poor or irregular attendance without delay. The College will follow up with parents/carers when pupils are not at school. This means we need to have, where reasonably possible, more than one, up to date, emergency contact number for each pupil. Parents should remember to update the College as soon as possible if the numbers change.

APPENDIX 4: CHILDREN WITH A SOCIAL WORKER AND PRIVATELY FOSTERED CHILDREN

At Scarborough College, we recognise that when a child has a social worker, it is an indicator that the child could be more at risk. This may mean that they are more vulnerable to further harm, as well as possibly facing educational barriers to attendance, learning, behaviour, and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.

A private fostering arrangement occurs when someone other than a parent or a close relative care for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents, or cousins.

By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify children's services at least six weeks before the arrangement is due to start.

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

Privately fostered children will be allocated a social worker.

Other children may need a social worker due to safeguarding or welfare needs.

Local authorities should share this information with Scarborough College, and the DSL will hold and use this information, in the best interests of the child, to inform decision making about safeguarding and promoting the child's welfare and educational outcomes.

APPENDIX 5: EARLY HELP AND INTERVENTION

KCSIE states that any child may benefit from early help, but all College and Prep School staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health, and Care Plan);
- has a mental health need;

- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, or exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as FGM or Forced Marriage;
- is a privately fostered child;
- is persistently absent from education, including persistent absences for part of the College day.

Referrals to Children's Social Care/Services for statutory assessments

Referrals to Children's Social Care/Services for statutory assessments are made under the Children Act 1989.

Section 17, Child in Need: A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare.

Section 47, Child suffering or likely to suffer significant harm: Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence and extra-familial threats like radicalisation and sexual exploitation.

Where there is a child in immediate danger of who is at risk of harm, for example a complaint involving a serious criminal offence, a referral will always be made to the relevant authority and/or police immediately, without further investigation within College. **Anyone can make a referral.** Where the referral is not made by the DSL, they should be informed as soon as possible that a referral has been made.

There may be a need for Children's Social Care/services and/or the police to provide immediate protection whilst an assessment or enquiries are carried out.

When making a referral of a case of suspected or alleged abuse, the person making the referral/ Designated Safeguarding Lead will ask to be informed of the timing of the strategy discussion between the statutory agencies which will decide whether and how to investigate.

The person making the referral/Designated Safeguarding Lead will clarify with the investigating agencies when, how and by whom the parents and the pupil will be told that a referral has been made. A member of staff, either the Designated Safeguarding Lead or the member of staff who knows the pupil best, (Form Tutor or Head of Year) will be prepared to contribute to the strategy discussion the School's knowledge of the pupil.

APPENDIX 6A: LAC, HOMELESSNESS, SERIOUS VIOLENCE

Looked-After Children (LAC)

A 'Looked-After' Child is one who is subject to a care order (either an interim or a full care order), or who is voluntarily accommodated by the local authority. The most common reason for children to be looked after by the Local Authority is as a result of abuse and/or neglect.

Appropriate pastoral staff should have all the relevant information required about:

- The child's looked after legal status (i.e., they are looked after under voluntary arrangements with the parents' consent, or are under an interim or full care order)
- The levels of authority delegated to the carer by the local authority
- Details of the child's social worker
- The name of the Virtual College Head in the authority that looks after the child (a Virtual College Head is an officer employed by the local authority to promote the educational achievement of the child)

Any Looked-After Children (LAC) in the College are supported by a designated teacher, whose aim is to promote and support their educational progress.

A previously Looked-After Child remains potentially vulnerable, and, where relevant, all staff will be supported to develop the skills, knowledge and understanding to keep him/her safe. In such a case the DSL and pastoral team would work closely with all agencies. The College recognises the need for prompt action to be taken when necessary to safeguard any LAC children, given their particular vulnerabilities.

HOMELESSNESS

There are many situations which are potentially harmful or concerns which may cause harm to children, and any evidence of any of these should be presented to the DST without delay.

Being, or being at risk of becoming homeless, present a real risk to a child's welfare. The DSLs are aware of the contact details and referral routes in the Local Housing authority so that they can raise concerns quickly where needed, together with a referral to Children's Social Care if a child is at risk of harm.

Indicators that a family may be at risk of homelessness may include a family being asked to leave a property or other such as:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour

SERIOUS VIOLENCE

All staff should be aware of the indicators that children are at risk from or are involved with serious violent crime. These may include:

- increased absence from College;
- a change in friendships;
- relationships with older individuals or groups;
- a significant decline in performance;
- signs of self-harm;

- a significant change in wellbeing;
- signs of assault or unexplained injuries; or
- unexplained gifts or new possessions.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence. These include:

- being male;
- having been frequently absent or permanently excluded from College;
- having experienced child maltreatment;
- having been involved in offending, such as theft or robbery.

Any concerns about a child should be reported through the College safeguarding procedures and discussed with the DST.

APPENDIX 6B: CHILDREN AND COURTS, PRISON, MODERN SLAVERY, CYBERCRIME

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a College can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to College on their own) it is important they are given practical advice on how to keep themselves safe. Many Colleges provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5–11-year-olds and 12–17-year-olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

Cybercrime

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as online bullying or general online safety.

Additional advice can be found at: Cyber Choices, 'NPCC - When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

APPENDIX 7: CHILDREN REQUIRING MENTAL HEALTH SUPPORT

All staff should 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.

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, and the College safeguarding procedures should be followed.

Scarborough College recognises the importance of educating children about mental health and this may be through the curriculum (including PSHE), assemblies and other areas such as peer support.

Identification

When children have suffered abuse or neglect, or some other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.

Negative experiences and distressing life events can affect mental health in a way that can bring about changes in a young person's behaviour or emotional state, displayed in a range of different

ways, all of which can be an indication of an underlying problem. This can include, but is not limited to:

- Emotional state (fearful, withdrawn, low self-esteem);
- Behaviour (aggressive or oppositional; habitual body rocking);
- Interpersonal behaviours (indiscriminate contact or affection seeking, overfriendliness or excessive clinginess; demonstrating excessively 'good' behaviour to prevent disapproval; failing to seek or accept appropriate comfort or affection from an appropriate person when significantly distressed; coercive controlling behaviour; or lack of ability to understand and recognise emotions).

Early Support and access to specialist support.

If staff are concerned about a child, they should follow the College safeguarding route and consult the DST.

Early support in College may include accessing the College nurses or the College counsellor. It may be necessary to make a referral to specialist support e.g., CAMHS.

APPENDIX 8: SEXUAL VIOLENCE AND SEXUAL HARASSMENT

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

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. This will be exacerbated if the alleged perpetrator(s) attends the same College.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal). They are never acceptable.

Staff should be aware that some groups are potentially more at risk and evidence shows that girls, children with SEND and LGBT children are at greater risk.

It is essential that all pupils are reassured that they are being taken seriously and that they will be supported and kept safe. A pupil should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a pupil ever be made to feel ashamed for making a report.

Staff at Scarborough College should be aware of the importance of:

- challenging inappropriate behaviours;
- making it clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as 'banter', 'part of growing up', or 'just having a laugh' or 'boys being boys'; and
- challenging 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.

Sexual violence

It is important that College staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- A child under the age of 13 can never consent to any sexual activity;
- The age of consent is 16;
- Sexual intercourse without consent is rape.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of College. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- upskirting or other forms of covert making of images; 'upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence.
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- ◆ non-consensual sharing of nudes and semi-nudes and/or videos. Taking and sharing nude photographs of U18s is a criminal offence;
- ◆ sharing of unwanted explicit content;
- ◆ sexualised online bullying;
- ◆ unwanted sexual comments and messages, including, on social media; and
- ◆ sexual exploitation; coercion and threats.

The response to a report of sexual violence or sexual harassment.

The initial response to a report from a child is incredibly important. How the College responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is essential that all victims 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If members of staff have a concern about a child or a child makes a report to them, **they should follow the referral process set out in this policy.** As is always the case, if staff are in any doubt as to what to do, they should speak to a member of the DST.

The DST will follow the guidance in KCSIE and also use the document 'Sexual violence and sexual harassment between children in Colleges and Schools. Advice for governing bodies, proprietor, headteachers, principals, senior leadership teams and designated safeguarding leads', updated September 2021 when investigating reports from pupils or staff.

A flowchart of possible outcomes is found in Appendix 12.

The NSPCC helpline 'Report abuse in education' can be accessed on 0800 163 663 or by email: help@nspcc.org.uk

Relationships and Sex Education and PSHE teach students about respectful, positive, safe and healthy relationships and consent.

APPENDIX 9: TERMINOLOGY

The following terminology is used in this policy:

Abuse is defined in the DfE document 'Keeping Children Safe in Education' as 'a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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. They may be abused by an adult or adults or by another child or children.'

Child/Pupil refers to all young people including those who have reached their 18th birthday.

Child in Need: defined under the Children Act 1989 as 'a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.' Children in Need may require multi-agency support, e.g., CAMHS, TAF, TAC (such as pupils with eating disorders or depression).

Child Protection refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

Children at Risk: those children who suffer from an acute problem or may be at significant risk of immediate harm. They require an immediate referral to Children's Services and Social Care, the local authority's Designated Officer (DO) support or the Police.

Contextual Safeguarding: Considering the context within which certain incidents and/or behaviours occur. Assessments of children should consider such factors, and the information provided by Colleges to agency decisions can prove very useful.

Early Help: KCSIE defines this as action that 'provides support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.' (KCSIE 2018 p. 6). If Early Help is appropriate, the DSL will liaise with other agencies to support the child and will keep the situation under constant review.

Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

Child-on-Child Abuse refers to a range of types of abuse perpetrated by a child on another child, including cyberbullying, physical assault (e.g., hitting, kicking, shaking, biting, hair pulling), verbal bullying, sexual assaults, gender-based violence, sending nudes and semi-nudes, upskirting, and initiation and ritualistic types of violence (also known as 'hazing').

Safeguarding and promoting the welfare of children refers to the process of protecting children from abuse or neglect, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and undertaking that role to enable those children to have optimum life chances and to enter adulthood successfully.

Sexual Assault: intentional sexual touching without consent.

Sexual Consent: Having the freedom and capacity to choose. In the context of sexual activity, it means that a person may agree to one kind of action but not another. Consent can be withdrawn at any time during sexual activity and each time the sexual activity occurs.

The age of consent to any form of sexual activity is 16 for both men and women. The age of consent is the same regardless of the gender or sexual orientation of a person and whether the sexual activity is between people of the same or different gender.

It is an offence for anyone to have any sexual activity with a person under the age of 16. However, Home Office guidance is clear that there is no intention to prosecute teenagers under the age of 16 where both mutually agree and where they are of a similar age.

It is an offence for a person aged 18 or over to have any sexual activity with a person under the age of 18 if the older person holds a position of trust (for example a teacher or social worker) as such sexual activity is an abuse of the position of trust.

The Sexual Offences Act 2003 provides specific legal protection for children aged 12 and under who cannot legally give their consent to any form of sexual activity. There is a maximum sentence of life imprisonment for rape, assault by penetration, and causing or inciting a child to engage in sexual activity.

Sexual Harassment: Unwanted conduct of a sexual nature which can occur online and in real life. Sexual harassment violates the victim's dignity, makes them feel intimidated, degraded and humiliated, and can create a hostile, offensive and sexualised environment.

Sexual Violence includes acts such as rape, assault by penetration and sexual assault.

Significant Harm is the threshold that justifies compulsory intervention in family life in the best interests of the child. There are no absolute criteria on which to rely when judging what constitutes significant harm, but consideration should be given to the following:

- The severity of ill-treatment which may include the degree and extent of physical harm including, for example, impairment suffered from seeing or hearing the ill-treatment of another
- The duration and frequency of abuse or neglect
- The extent of premeditation

Staff refers to all those working for or on behalf of the College, full-time or part-time, in either a paid or voluntary capacity.

APPENDIX 10: EDUCATION AT HOME AND REMOTE LEARNING

Safeguarding pupils and teachers online.

Most children were educated at home from March 20, 2020, until the summer break during the coronavirus (COVID-19) outbreak, and some students may have had to go into periods of isolation from September 2020 or undergo periods of blended learning. School leaders and teachers are having to adjust to remote education strategies. While this is happening, it is important that Colleges continue to follow safeguarding procedures.

As set out in the [Coronavirus \(COVID-19\): safeguarding in Colleges, colleges and other providers](#) guidance, online education should follow the same principles set out in the College's staff behaviour policy.

Keeping teachers safe when providing remote education is also essential. Remote education is a new experience for both staff and pupils, so it's important that staff understand how to approach safeguarding procedures online.

Guidance on [teaching online safety in Colleges](#) provides information to help Colleges ensure their pupils understand how to stay safe and behave online.

School contact with parents and carers during this time can also be used to reinforce the importance of children staying safe online.

It's especially important for parents and carers to be aware of what their children are being asked to do, including:

- sites they will be asked to use
- College staff their child will interact with

Schools should emphasise the importance of a safe online environment and encourage parents and carers to set age-appropriate parental controls on digital devices and use internet filters to block malicious websites. These are usually free, but often need to be turned on.
Specific guidance will be provided by the senior leadership team.

Reporting concerns

It is essential to have and communicate clear reporting routes so that children, teachers, parents and carers can raise any safeguarding concerns. Any child protection concern must be reported as

now to the DST or if it involves an allegation against staff to the Head (or for allegations against the Head, to the Chair of Governors).

Communicating with parents, carers and pupils.

Where education is now having to take place remotely, it's important for Colleges, teachers and pupils to maintain professional practice as much as possible. When communicating online with parents and pupils, Colleges should:

- communicate within College hours as much as possible (or hours agreed with the College to suit the needs of staff)
- communicate through the College channels approved by the senior leadership team
- use College email accounts (not personal ones)
- use College devices over personal devices wherever possible
- do not to share personal information

Virtual lessons and live streaming.

Teaching from home is different to teaching in the classroom. Teachers should try to find a quiet or private room or area to talk to pupils, parents, or carers. When broadcasting a lesson or making a recording, consider what will be in the background.

In some areas, Colleges may also be able to seek support from their local authority when planning online lessons and activities and considering online safety.

Providing pastoral care remotely.

Helping parents, carers and pupils to make a weekly plan or structure that includes time for education, playing and relaxing is important to reduce stress and anxiety for families.

As set out in [Public Health England's guidance for parents and carers](#), routine can give children and young people an increased feeling of safety in the context of uncertainty.

Schools might want to consider whether one-to-one sessions could be appropriate in some circumstances. For example, to provide pastoral care or provide support for pupils with special educational needs and disabilities (SEND).

This should be discussed and approved by the senior leadership team to assess any risks. There may be helpful solutions, such as including a parent or additional staff member in the call.

Personal data and GDPR.

Schools and colleges should continue to follow the guidance outlined in the [data protection: toolkit for Colleges](#) when managing personal data and may need to consider:

- taking care not to share contact details when emailing multiple people;
- being careful when sharing usernames and other personal data for access to online resources;
- providing access to College data systems safely.

Sharing nudes and semi-nudes: how to respond to an incident

An overview for all staff working in education settings in England

This document provides a brief overview for frontline staff of how to respond to incidents where nudes and semi-nudes have been shared.

All such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) or equivalent and managed in line with your setting's child protection policies.

The appropriate safeguarding lead person should be familiar with the full 2020 guidance from the UK Council for Internet Safety (UKCIS), *Sharing nudes and semi-nudes: advice for education settings working with children and young people* and should **not** refer to this document instead of the full guidance.

What do we mean by sharing nudes and semi-nudes?

In the latest advice for Colleges and colleges (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's Airdrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year-olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

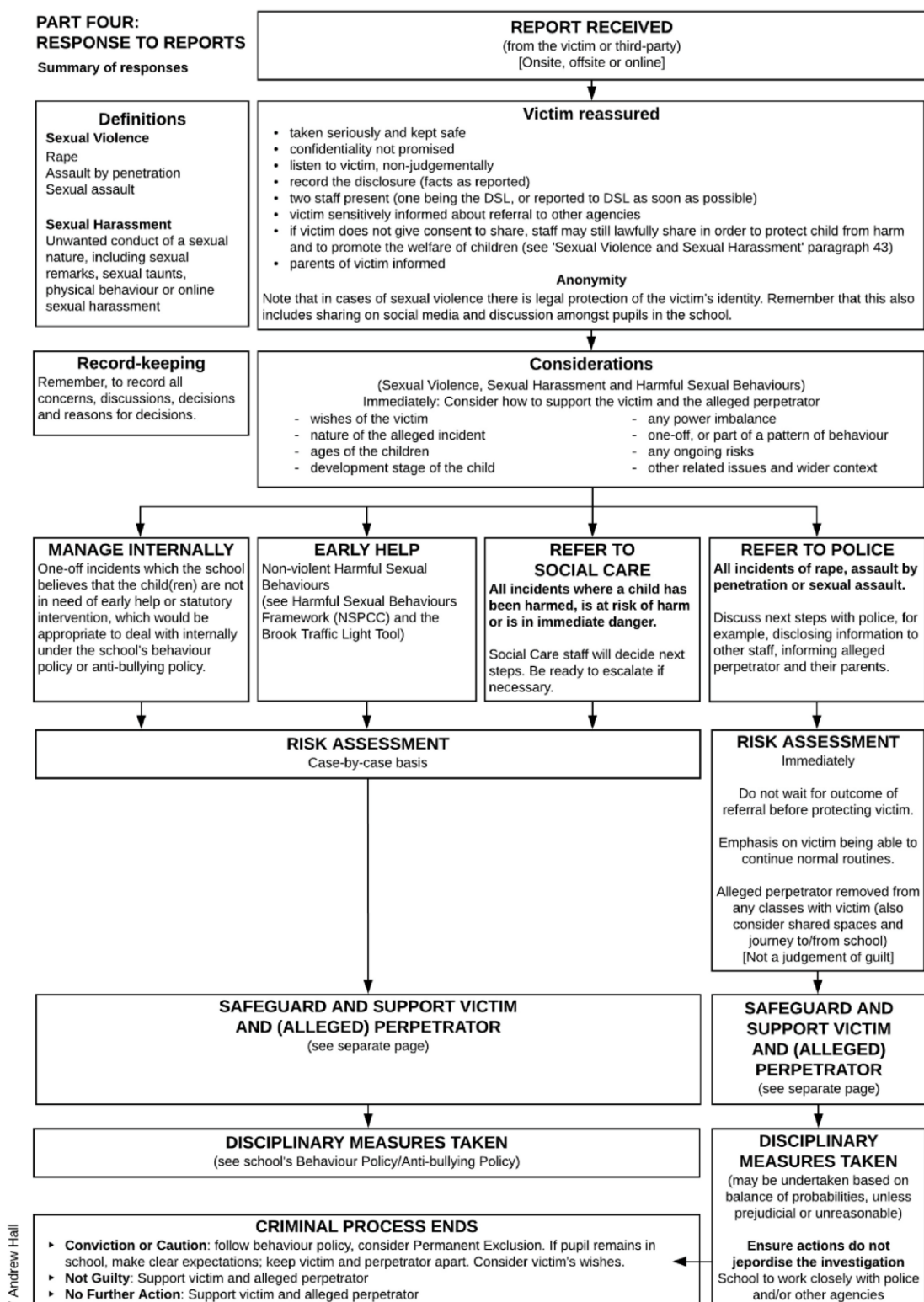
What to do if an incident comes to your attention.

Report it to your Designated Safeguarding Lead (DSL) or equivalent immediately. Your setting's child protection policy should outline codes of practice to be followed.

- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal**.¹
- If you have already viewed the imagery by accident (e.g., if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not** delete the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).
- For further information Download the full guidance, *Sharing nudes and semi-nudes: advice for education settings working with children and young people* (UKCIS, 2020) at www.gov.uk/government/publications/sharing-nudesand-semi-nudes-advice-for-education-settings-working-with-children-and-young-people.

¹ In exceptional circumstances, it may be necessary for the DSL (or equivalent) only to view the image in order to safeguard the child or young person. That decision should be based on the professional judgement of the DSL (or equivalent).

APPENDIX 12 – RESPONSE TO REPORTS OF SEXUAL HARASSMENT OR SEXUAL VIOLENCE



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Source:
Sexual Violence and Sexual Harassment between children in schools and colleges (DfE, 2017)

SVSH Flow Chart for Schools 2017 v.1.0

Safeguarding and supporting victims and alleged perpetrators

Victim	Alleged Perpetrator	Other children
<ul style="list-style-type: none"> ■ needs and wishes of victim are paramount ■ not made to feel they are the problem ■ consider proportionality of response ■ aim for victim to carry out normal routine ■ recognise that they may struggle in class and may need time out (if they wish) ■ be aware that they may not disclose the whole picture immediately ■ prepare for support over a long period and consider who is involved (internal and external) ■ if victim moves College, the Designated Safeguarding Lead (DSL) informs the new College of the need for continued support 	<ul style="list-style-type: none"> ■ possible tension between discipline and support (these are not mutually exclusive) ■ consider age/developmental stage/any SEND ■ proportionate response ■ consider unmet needs (for example, harmful sexual behaviours (HBV) in younger children may be a sign or abuse or trauma) ■ if (alleged) perpetrator moves College, the Designated Safeguarding Lead (DSL) informs the new College of the issues and transfers the child protection file 	<ul style="list-style-type: none"> ■ witnesses may need support (especially in cases of sexual violence) ■ avoid allowing pupils to 'take sides' ■ minimise potential for bullying or victimisation in College and on College transport ■ be aware of any social media use and inappropriate or even illegal posts (especially in cases of criminal investigation where anonymity is legally guaranteed) ■ develop safeguarding culture ■ constantly review reporting procedures and responses ■ consider potential for systematic and environmental weaknesses

Further Links

Sexual Violence and Sexual Harassment between children in Colleges and colleges (DfE, 2017)

www.safeguardinghandbook.co.uk/svsh

Harmful Sexual Behaviour Framework (NSPCC)

www.safeguardinghandbook.co.uk/hsbf

Sexual Behaviours Traffic Light Tool (Brook) (identifying typical and atypical sexual behaviours)

www.safeguardinghandbook.co.uk/brook

Preventing bullying (DfE)

<http://www.safeguardinghandbook.co.uk/bullying>

Assessing behaviour.

Hackett's 'Continuum of children and young people's sexual behaviours' model can help practitioners to understand that children and young people's sexual behaviours exist on a wide continuum from normal to abusive and violent behaviours and may move fluidly between each category. It is important to note that an isolated incident that demonstrates problematic or abusive behaviour may not necessarily be indicative of the child or young person's overall sexual behaviour.

It is important for professionals to place a child's sexual behaviour within the context of their age and development.

All concerns should be referred using the College safeguarding procedures and discussed with the DST.

Adapted from 'A continuum of children and young people's sexual behaviours' (Hackett 2010)

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected	Single instances of inappropriate sexual behaviour	Problematic and concerning behaviours	Victimising intent or outcome	Physically violent sexual abuse
Socially acceptable	Socially acceptable behaviour within peer group	Developmentally unusual and socially unexpected	Includes misuse of power	Highly intrusive
Consensual, mutual, reciprocal	Context for behaviour may be inappropriate	No overt elements of victimisation	Coercion and force to ensure victim compliance	Instrumental violence which is physiologically and/or sexually arousing to the perpetrator
Shared decision-making	Generally consensual and reciprocal	Consent issues may be unclear	Intrusive	Sadism
		May lack reciprocity or equal power	Informed consent lacking or not able to be freely given by victim	
		May include levels of compulsivity	May include elements of expressive violence	

APPENDIX 13: SAFER RECRUITMENT

The College will follow the guidance provided in the Independent Schools Inspectorate Commentary regarding the Standards for Staff, Agency and Supply Staff, Volunteers, and Governors.

The College keeps a Single Central Record (SCR) detailing a range of checks carried out on their staff (including supply staff and teacher trainees on salaried routes) who work at the College and all members of the governing body.

The following pre-appointment checks will be made prior to the starting date:

- Identity in all cases;
- Qualifications where required for the role;
- Enhanced DBS;
- Barred list for all including those presumed to be in regulated activity;
- Prohibition from teaching for all in teaching roles including peripatetic and coaches;
- Prohibition from management (Section 128) for all teachers in managerial roles and for any non-teacher on the senior leadership team;
- Right to work in all cases except volunteers;
- Overseas police checks when applicable, or third reference where such checks are unobtainable;
- Overseas professional association checks when applicable, or third reference where such checks are unobtainable;
- Medical declaration in all cases;
- Employment history including a confidential declaration that there is no reason why the applicant may not work in an environment where children are present in all cases;
- As indicated in KCSiE (2023), the College is required to inform shortlisted candidates that online searches may be done as part of due diligence checks;
- Two references, obtained whenever possible prior to interview in all cases;
- Disqualification from childcare declaration for those working with under 8s including for those involved in pre and after College supervision.

The guidance provided for contractors, visitors, and visiting speakers will also be followed.

In accordance with the National Minimum Standards for Boarding, letters of agreement will be kept for any person 16 and over not employed by the College but living in boarding accommodation: such persons will also be subject to DBS checks.

All those visiting the College will be asked for ID on arrival and will be provided with appropriate safeguarding and other health and safety guidance.

At least one member of any recruitment panel will be safer recruitment trained.

All College staff are made aware that they are required to disclose any convictions or cautions received during their employment at the College or receive a Penalty Notice for Damage or a Penalty Notice for Disorder. For those who drive on business at any point during their employment (whether in a College vehicle or their own) this includes all motoring offences dealt with through the courts, and penalty points on driving licenses – whether awarded by a court or through fixed penalty notices.

EYFS Staff are made aware that they are expected to disclose any convictions, cautions, court orders, reprimands and warnings which may affect their suitability to work with children (whether received before or during their employment at the College) or any circumstances which could lead to consideration of disqualification.

APPENDIX 14: DST, GOVERNORS, AND COLLEGE TRAINING SCHEDULE

Whole School	Annual in-house refresher training – run by DSL – April each year. KCSiE (Sept 2019) - Full Staff Training Session - September 2019 KCSiE (Sept 2020) – Full Staff Training Session - September 2020 including updated training on Prevent, FGM & Domestic Abuse KCSiE (Sept 2021) – Full Staff Training Session - September 2021 including external training led by Ray Galloway & Sarah Lynch KCSiE (Sept 2022 Amends) – Full Staff Training – September 2022 KCSiE (Sept 2023 Amends) – Full Staff Training – September 2023	
DSL Tim Cashell	Level 3 Certificate in Safeguarding for Designated Safeguarding Leads - July 2023	Safer Recruitment in Education July 2023 – TES/EduCare
Deputy DSL Julie Fraser	Level 3 Child Protection Training for Designated Safeguarding Leads – March 2022	Safer Recruitment in Education October 2023 – TES/EduCare
Head of the College Guy Emmett	DSL Refresher Course 2015	Safer Recruitment in Education February 2021 – TES/EduCare Due for renewal February 2024
Head of Prep DSL for Prep & EYFS Chris Barker	Level 3 Child Protection Training for Designated Safeguarding Leads – March 2022	Safer Recruitment in Education February 2021 – TES/EduCare Due for renewal February 2024
Chairman of Governors John Renshaw	Child Protection Basic Awareness NYSCB	Safer Recruitment in Education October 2020 – EduCare
Nominated Governor for Safeguarding (DSG) James Cliffe	Safeguarding Children online basic awareness (2018)	Fire awareness (2018) H & S for Managers (2017)
Deputy DSL for Prep & EYFS Kate Hill	Level 3 Child Protection Training for Designated Safeguarding Leads – March 2022	
Business Manager Alison Higgins	Child Protection Basic Awareness NYSCB	Safer Recruitment in Education October 2023 – TES/EduCare
School Nurse Linda Pinkney	Level 3 Child Protection Training – August 2022 E-magination – July 2016	

APPENDIX 15: REFERRALS TO CHILDREN & FAMILIES SERVICE AND FURTHER INFORMATION

Professionals in all agencies have a responsibility to refer when it is believed or suspected that a child:

- Has suffered significant harm and /or;
- Is likely to suffer significant harm and/or;
- Has developmental and welfare needs which are likely only to be met through provision of family support services (with agreement of the child's parent).

If you are worried about a child or a young person under the age of 18, you should contact the Children & Families' Service through the Customer Service Centre. A written confirmation of the referral must be completed and submitted within 48 hours. Where possible, North Yorkshire CYPS request that you use their official referral form (see link below) to ensure that all relevant information is provided to ensure that the referral can be progressed as effectively as possible.

To access the form please click on one of the links below:

<http://safeguardingchildren.co.uk/admin/uploads/forms/cfs-referral-form-v2-2.docx>

<http://www.safeguardingchildren.co.uk/referral-process>

<http://www.safeguardingchildren.co.uk/section-5-procedures.html>

Partnership sharing information form (for reporting info to Police):

<https://docs.google.com/document/d/1vAmo64WEs4X1NfLZeFwBS2VkLGK5JjliUoPqIHdDnr4/e/dit#>

Websites

North Yorkshire Safeguarding Children Board: www.safeguardingchildren.co.uk

CAPE (Child Protection in Education): www.cape.org.uk

Sexual abuse: www.parentsprotect.co.uk

Metropolitan Police: www.safe.met.police.uk/index.html

Cyberbullying: www.digizen.org

KS2/3: www.dotcomcf.org

Bullying & child abuse: www.kidscape.org.uk; www.childline.org.uk; www.nspcc.org.uk

Domestic Violence: www.idas.org.uk

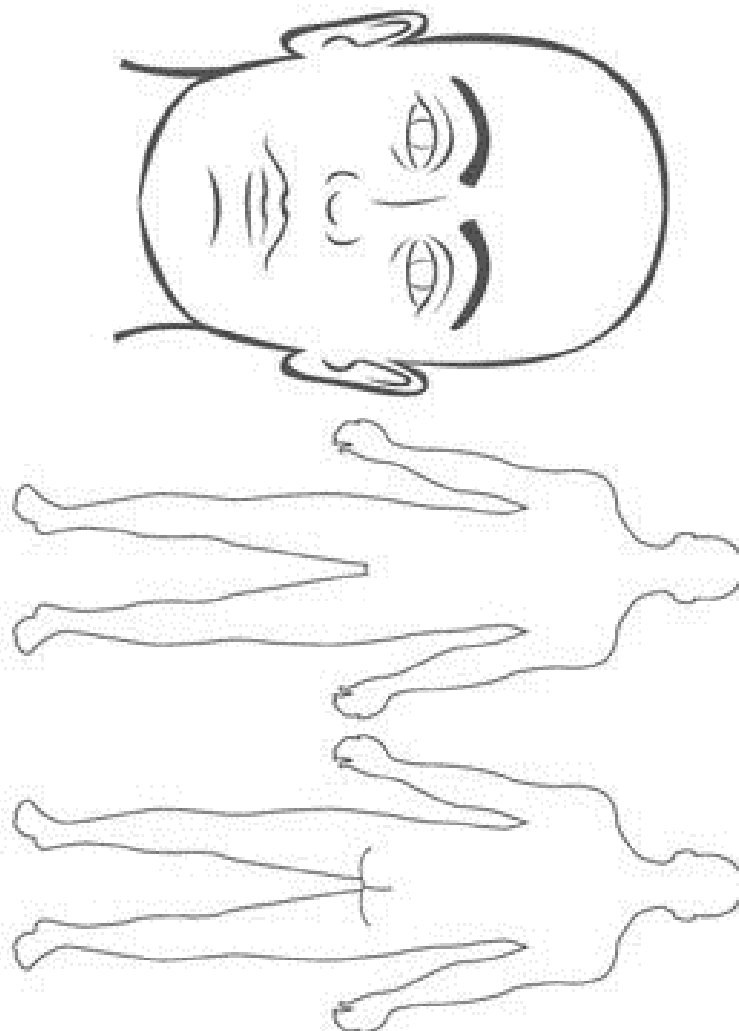
Internet Safety: www.ceop.gov.uk

DCSF/DfE Documents: www.education.gov.uk/Colleges

Online Basic Awareness Training: www.safeguardingchildren.co.uk

Diagram to be used to record injuries – PHOTOGRAPHS SHOULD NOT BE TAKEN

This diagram should be accompanying a 'Safeguarding Note of Concern' or a formal referral form. Indicate the size, colour and position of any injuries seen: NEVER view any part of the body not normally covered by clothing.



Name of child:		Date	
Name of person reporting:		Time	
Any other information:			

Scarborough College – Safeguarding Children – Note of Concern

Name of Child:		Tutor Group/Form:		Date:	
<p>Issue: Please record the details of the incident/issue you are concerned about. Include verbatim comments where possible. Keep the account factual. Please continue on the reverse if necessary. If any injuries are seen please record these on a diagram – do not take photographs or view any part of the body not normally covered by clothing.</p>					
Name and role of person reporting the concern:			Signature of person reporting the concern:		
How did you become aware of the issue? Please circle opposite:		Observation		Disclosure	
Reported to:		Date and Time report completed:			
<p>Outcome: Please include the outcome of the discussions with parents/carers where this is appropriate.</p>					
Further action: Please circle below:					
Continue to Monitor	Advice from Social Care	Meeting of SMT/CP Team	Refer to Social Care/Police		
Signature of SMT/DSL for Child Protection:			Date:		

Additional Notes continued from overleaf: