Child Protection and Safeguarding Policy and Procedures

Brooke House College

2026/27 Version

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College Contacts

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Deputy Designated Safeguarding Leads	Name: Linda Mugadzaweta (School Nurse) Email: nurse@brookehouse.com **Tel: 01858 434245** **Mobile: 07702515445** Name: Wylie Wright (Director of Summer School) Email: w.wright@brookehouse.com Mobile: 07710 509515 Name: Constantin Leonte (Head of Boarding) Email; l.constantin@brookehouse.com **Mobile: 07702515441** Name: Cory White (FA Email: c.white@brookehouse.com
Principal	**Name: Ian Smith** Email: principal@brookehouse.com Tel: 01858 462452 (Ext: 211) **Mobile: 077702 515435**
Nominated Safeguarding Director	**Name: Joan Williams** Email: j.williams@brookehouse.com **Mobile: 07802 631306**
Independent Listener: Stina Farrell	**Mobile: 07703 728226**

Contacts

Head of Service - Safeguarding and Performance Service

Kelda Claire Tel: 0116 305 9084 / 07507686100

LADO / Allegations:

Kim Taylor / Lovona Brown / Shellie Miskella cfs-lado@leics.gov.uk Tel: 0116 305 7597

or Tel: 0116 305 4141

Designated Officer(s) of the Local Authority:

Names:	Mark Goddard and Karen Browne
Address:	Safeguarding and Improvement Unit Room 500 County Hall Glenfield LE3 8RA
Email and tel:	mark.goddard@leics.gov.uk - 0116 305 7597
Email and tel:	karen.browne@leics.gov.uk - 0116 305 4532

First Response Team and out of hours:

Referral Desk Tel: 0116 305 0005
Advice phone number for professionals Tel: 0116 305 5500

Joanne.searle@leics.gov.uk Tel: 0116 3053909

donna.smalley@leics.gov.uk Tel: 0116 3056631

Early Help queries and Consultation Line: **Tel:** 0116 305 8727

earlyhelpreferrals@leics.gov.uk

CCE/CSE Consultation Line Tel: 0116 3059521
CSE.duty.team@leics.gov.uk

Leicestershire and Rutland Children's Social Care department:

Leicestershire Tel: 0116 305 0005

Email: childrensduty@leics.gov.uk

www: www.lrsb.org.uk

Rutland Tel: 01572 758 407

Email: childrensduty@rutland.gcsx.gov.uk

The local police non-emergency contact number for FGM reporting is 101.

The Local Authority Prevent Contact Information:

St Philip's Centre Limited
2A Stoughton Drive North
Leicester
LE5 5UB

Tel: 0116 273 3459
Mobile: 07403 727727
Email: prevent@stphilipscentre.co.uk
Prevent.Team@leicestershire.pnn.police.uk Tel 101 ext 2541

Channel Referral Prevent Engagement Team]	0116 248 6726
Nn-emergency DfE advice	020 7340 7264
	counter-extremism@education.gsi.gov.uk

National advice line Tel: 0800 011 3764

Email Leicestershire Police Prevent team
at preventengagement.team@leicestershire.pnn.police.uk or call 0116 248 6726.

Email the Leicester, Leicestershire and Rutland Prevent co-ordinator
at prevent@stphilipscentre.co.uk or call 0116 273 3459

https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales

Other useful contacts

The NSPCC whistleblowing helpline can be contacted on:
National Society for the Prevention of Cruelty to Children (NSPCC)
Weston House
42 Curtain Road
London
EC2A 3NH
Tel: 0808 800 5000 Email: help@nspcc.org.uk

Dedicated NSPCC sexual abuse helpline 0800 136 663
This new helpline will provide both children and adults who are potential victims of sexual abuse in schools with the appropriate support and advice. This includes how to contact the police and report crimes if they wish. The helpline will also provide support to parents and professionals too.

Childline 0800 1111

S&A Safeguarding Advice & Support

Simon Genders; email: simongenders@countysafeguarding.co.uk tel: 07928144864
Ann Prideaux; email: annprideax@countysafeguarding.co.uk tel: 07845 552449

1. Policy statement

1.1 Every pupil should feel safe and protected from any form of abuse and neglect and exploitation. Pupils will learn how to keep themselves safe and how to recognise when they are risk and how to get help when they need it. The College is committed to safeguarding, creating a culture of vigilance, and promoting the welfare of children and young people and requires everyone who comes into contact with children and their families to share this commitment.

1.2 KCSIE defines safeguarding and promoting the welfare of children as providing help and support to meet the needs of the children as soon as problems emerge. Protecting children from maltreatment whether that is within or outside the home, including online; 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

1.3 The College's Child Protection and Safeguarding Policy and Procedures (**Policy**) has regard to the following guidance and advice:

1.3.1 Keeping children safe in education (September 2026) (**KCSIE**);

1.3.2 Relationships education, relationships and sex education (RSE) and health education (updated July 2025 – implemented 1st September 2026)

1.3.3 Working Together to Safeguard Children (18th March 2026 updated);

1.3.4 Prevent Duty Guidance for England and Wales (December 2023 revised March 2024);

1.3.5 Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (14th October 2025);

1.3.6 Multi-agency statutory guidance on FGM (2016) Updated 30th July 2020, Forced Marriage Updated

1.3.7 and Breast Ironing non-statutory guidance updated December 2025;

1.3.8 What to do if you're worried a child is being abused: advice for practitioners (2015);

1.3.9 Information sharing: advice for practitioners providing safeguarding services (May 2024).

1.3.10 Meeting digital & technology standards in schools & colleges (May 2024) (Filtering & Monitoring Standards)

1.3.11 Data Protection: Toolkit for schools (DFE, April 2024) should be used by staff governors and trustees to help them comply with data protection law and develop policies and processes.

1.3.12 Sexual violence and sexual harassment between children (Sept 2021) updated KCSIE 2026

1.3.13 Criminal exploitation of children and vulnerable adults: County lines

1.3.14 UKCCIS: Sexting in schools and colleges (2017)

1.3.15 'Upskirting' Voyeurism Offences Act 2019 & downblousing

1.3.16 Teaching online safety in school guidance DfE Updated January 2023 updated KCSIE 2026

1.3.17 When to call the police: NPCC (National Police Chiefs Council)

1.3.18 National Minimum Boarding Standards September 2022 updated April 2026

This policy also takes into account the procedures and practice of Leicestershire Local Authority and the published safeguarding arrangements set out by the neighbouring safeguarding partners.

The Advisory Body and Senior Leadership Team, especially their designated safeguarding leads, will:

• make themselves aware of and follow their local arrangements (including the local criteria for action and the local protocol for assessment)

• ensure this is reflected in their own policies and procedures

• supply information as requested by the local safeguarding partners

• work with social care, the police, health services and other services to promote the welfare of children and protect them from harm

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners 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. 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 and taking prompt action.

The College will ensure they facilitate a whole-school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Staff working with children should have an attitude of 'it could happen here' and no reports in their school it does not mean it is not happening. Where there is a safeguarding concern, the school will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback.

Our local safeguarding partner is Leicestershire Safeguarding Children Partnership, and the locally agreed safeguarding arrangements can be found at https://www.leicestershire.gov.uk/education-and-children/child-protection-and-safeguarding

1.4 The College will:

1.4.1 follow the local inter-agency procedures of the [LRSCP] Leicestershire and Rutland safeguarding Children Partnership.

1.4.2 ensure the practice of safer recruitment in checking the suitability of staff, directors and volunteers (including staff employed by another organisation) to work with children and young people, and ongoing suitability of staff, directors and volunteers. The College's separate Safer Recruitment Policy will ensure that all recruitment, volunteer engagement and DBS checking arrangements comply with the latest KCSIE and statutory safeguarding requirements. Particular regard will be given to determining whether individuals are engaged in regulated activity and therefore require an enhanced DBS check, including barred list information where appropriate and will;

1.4.3 be alert to signs of abuse both in the College and from outside (considering wider environmental factors in a pupil's life that may be a threat to their safety and/or welfare. E.g., contextual safeguarding), and to protect each pupil from any form of abuse, whether from an adult or another pupil. This includes low level concerns.

1.4.4 deal appropriately with every suspicion or complaint of abuse and to support children who have been abused in accordance with their agreed child protection plan.

1.4.5 design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations.

1.4.6 be alert to the needs of children with physical and mental health conditions.

1.4.7 operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse.

1.4.8 assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area.

1.4.9 identify children who may be vulnerable to radicalisation, and know what to do when they are identified; and

1.4.10 consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in the College or in the local area.

1.4.11 Advisory Board to receive training at Induction in September in person and by webinar/SmartLog and bespoke resources generated by the DSL/Principal

1.5 **Application and accessibility**

1.5.1 This Policy is a whole-college policy, and applies wherever staff, Directors and volunteers are working with pupils even where this is away from the College, for example an educational visit.

1.5.2 This Policy is published on the College website and is available in hard copy on request. It can be made available in large print or other accessible format if

required. Related polices and the Staff Code of Conduct are available on the College website or available on request to the College. COO@brookehouse.com

1.6 **Related policies**

1.6.1 The following policies, procedures and resource materials are also relevant to the College's safeguarding practices:

(a) Staff Code of Conduct

(b) Staff Acceptable Use and Social Media Policy (contained in the Staff Handbook)

(c) Whistleblowing Policy

(d) Safer Recruitment Policy

(e) Anti-bullying Policy and behaviour & discipline policy

(f) Data protection policy, the Children's Code for privacy, the related Policy on the Safe and Acceptable Use of ICT including online & remote learning. Covid mitigation is in hibernation and accessible

(g) Visitor and Access to Grounds Policy

(h) Risk Assessment Policy for Pupil Welfare

(i) Missing Pupil Policy & Children Missing from Education Policy

(j) Policy on Special Educational Needs and Learning Difficulties

(k) Disability Policy

(l) Policy on the administration of medicines and supporting pupils with medical conditions

(m) resource materials for the governance of school safeguarding

(n) Equal Opportunities Policy including Transgender Policy

(o) Relationships Education, RSE & Health Education Policy

(p) Child-on-Child Abuse Policy

(q) Attendance Policy

(r) Transgender Policy

1.6.2 These policies procedures and resource materials are available to staff on the College's intranet and hard copies are available on request. COO@brookehouse.com

2. The Designated Safeguarding Lead

2.1 The College's Board of Directors has appointed a Designated Safeguarding Lead (**DSL**). The DSL is a senior member of staff of the College's leadership team with the necessary status and authority to take lead responsibility for safeguarding and child protection (Including online safety & understanding of filter & monitoring systems in the College).

2.1.1 The role of the DSL is fully defined within the latest version of KCSIE (2026) Annex B. The following broadly summarises the role;

2.1.2 ensure the college's child protection policies are known, understood and used appropriately.

2.1.3 ensure the college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or directors regarding this.

2.1.4 ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the college in this.

2.1.5 link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and

2.1.6 help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and the college leadership team. The role includes ensuring that the college, and the staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children. Safeguarding requests for transferring pupils and arrivals/departures at non-standard times is also sent to the relevant local authority agency.

2.2 The DSL shall be given the time, funding, training, resources and support to enable them to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings - and/or to support other staff to do so - and to contribute to the assessment of children.

2.3 The name and contact details of the DSL are set out in the College Contacts list at the front of this Policy. The main responsibilities of the DSL are set out in Appendix 1.

2.4 If the DSL is unavailable the activities of the DSL will be carried out by one of the Deputy DSLs. The Deputy DSLs details are also set out in the College Contacts list at the front of this Policy. In this Policy, reference to the DSL includes the Deputy DSL where the DSL is unavailable. The College will always ensure that there is safe coverage for the DSL with DDSLs and has robust procedures in place when the DSL is absent.

2.5 The DSL and Deputy DSL may be contacted on their mobile telephones in relation to any safeguarding concerns out of College hours.

3. Duty of staff, Directors and volunteers

3.1 All staff, Directors and volunteers of the College are under a general legal duty:

3.1.1 to protect children from abuse.

3.1.2 to be aware of the terms and procedures in this Policy and to follow them.

3.1.3 to know how to access and implement the procedures in this Policy, independently if necessary.

3.1.4 to keep a sufficient record of any concerns, discussions and decisions in accordance with this Policy; and

3.1.5 to report any matters of concern in accordance with this Policy.

3.2 The Board of Directors ensures that:

3.2.1 there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.

3.2.2 the College's safeguarding arrangements consider the procedures and practice of the LRSCP, including understanding and reflecting local protocols for assessment and the referral threshold document; and

3.2.3 the College contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of children are identified and support to children subject to child protection plans.

3.3 The Principal will ensure that the policies and procedures adopted by the Board of Directors, particularly concerning referrals of cases of suspected abuse and neglect and exploitation, are followed by all staff, and will evidence this with a staff questionnaire and declaration form. (See 4.3.6 below)

3.4 The Board of Directors, as the proprietorial body, has nominated one of its members to take leadership responsibility for the College's safeguarding arrangements. The Nominated Safeguarding Director is Mrs Joan Williams whose contact details are set out in the College Contacts list at the front of this Policy.

4. Training

4.1 All training will be carried out in accordance with Leicestershire and Rutland safeguarding partnership procedures. To ensure a thorough knowledge of local protocols as required in KCSIE 2026.

4.2 **Induction**

4.2.1 All staff, including temporary staff and volunteers, will be provided with induction training that includes:

(a) this Policy.

(b) the staff Code of Conduct and Staff Handbook, including the whistleblowing policy, staff Social Media Policy and Acceptable Use of IT Policy.

(c) the role of the Designated Safeguarding Lead, their identity and contact details together with that of and their Deputy.

(d) child protection training in accordance with LRSCP procedures including cyber-bullying, child on child sexual abuse and sexual harassment and RSHE teaching.

(e) a full copy of Part 1 KCSIE for all staff and Annex A for SLT;

(f) appropriate Prevent training.

(g) appropriate online safety awareness training

(h) role & responsibility in relation to IT filtering & monitoring systems

(i) all pupil behaviour policies

(j) the safeguarding response to Children Missing Education (CME) in accordance with the College's Missing Pupils Policy & Attendance Policy

4.3 **Child protection training**

4.3.1 All staff, including directors, advisory board members, volunteers, temporary staff and those not directly working with children, must read Part One of KCSIE 2026 in full and confirm understanding. See 3.3 above

4.3.2 The Principal and all staff members will undertake appropriate child protection training which will be updated annually and following consultation with the LRSCP. In addition, all staff members will receive safeguarding and child protection updates via e-mail, e-bulletins and staff meetings on a regular basis and at least annually.

4.3.3 Staff development training will also include training on how to manage a report of a child-on-child sexual violence or harassment act, online safety and Prevent training assessed as appropriate for them by the College.

4.3.4 Additionally, the College will assess the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child sexual exploitation, female genital mutilation, cyberbullying and mental health, and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

4.3.5 The Nominated Safeguarding Director and all other Directors will receive appropriate training to enable them to fulfil their safeguarding responsibilities.

4.3.6 The College has mechanisms in place to assist staff to understand and discharge their role and responsibilities with particular regard to KCSIE Part 1, and to ensure that they have the relevant skills and knowledge to safeguard children effectively, including questionnaires / test your understanding forms, staff meetings, professional development reviews. See 3.3 above

4.4 **Designated Safeguarding Lead**

4.4.1 The DSL and Deputy DSL will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent awareness

training and will be updated at least every two years. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL, see Appendix 1.

4.4.2 Prevent duty training will be consistent with Home Office WRAP (Workshop to Raise Awareness of Prevent) training if available.

4.5 **Teaching pupils about safeguarding**

4.5.1 The College teaches pupils about safeguarding through the curriculum and PSHE, including guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, and providing information about who they should turn to for help. RSHE is embedded within the PSHE programme and is taught within three themes: - Theme 1: Health and wellbeing, Theme 2: Relationships and Theme 3: Living in the wider world.

The use of social media for online radicalisation

The UK Safer Internet Centre http://www.saferinternet.org.uk

CEOP's Thinkuknow website http://www.thinkuknow.co.uk

4.5.2 The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities. The College has appropriate filters and monitoring systems in place (see the College's Policy on the Safe and Acceptable Use of ICT Updated with KCSIE and is mindful that this should not lead to unnecessary restrictions on learning. The aims of our online provision will be such that the College will evaluate what pupils see online and will teach the pupils to recognise techniques for persuasion, types of online behaviour, the ability to recognise online risks and inform the pupils how and when to seek support.

4.5.3 The College also sends a very clear message within its educational programme regarding 'sexting' and 'upskirting & downblousing'. This topic is dealt with in assemblies, the PSHE curriculum and with outside agency presentations.

(a) "upskirting" became a specific criminal offence under the Voyeurism (Offences) Act 2019 [April 2019]. It typically involves taking a photograph under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification or causing humiliation, distress or alarm.

'Downblousing' refers to the practice of making unauthorized photographs down the top of a female's dress, capturing an image of her breasts. The practice is regarded as a form of sexual fetishism or voyeurism and is similar in nature to upskirting. For ethical and legal issues relating to similar types of photography, see upskirt.

(b) "Sexting" [Youth produced sexual imagery including requests for and the transmission of nudes and semi-nudes], and the use of AI to produce 'deepfake' sexualised images. The College will always respond if informed that pupils have been involved in 'Sexting' and AI imagery. The College will

use KCSIE 2026, and the UK Council for Child Internet Safety (UKCCIS) guidance, "Sexting in schools and colleges: responding to incidents & safeguarding young people" as its guide. The key points being: -

- Inform the Principal/DSL as soon as possible
- Support the victim as appropriate and in accordance with their best interests
- Inform all parents of involved children unless by doing so you put a child at risk
- Images will not be viewed by school staff
- If school is to deal with the matter, involve parents in ensuring the images are deleted
- If there is evidence of exploitation or the targeting of a vulnerable student, inform the police

(c) What to do if an incident comes to your attention

Report it to your Designated Safeguarding Lead (DSL) or equivalent immediately.

Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.

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).

4.5.4 Child-on-Child abuse (formally described as peer-on-peer) is also tackled within the PSHE curriculum and by other means. Within this structure, the College explains how:

I) Child-on-child abuse will be dealt with

ii) How the risk of child-on-child abuse will be minimised by:

- Provide appropriate and regularly updated staff training.

- Challenge inappropriate behaviours.
- Provide a preventative curriculum programme.
- Resources.

iii) How child-on-child abuse will be recorded, investigated, and if necessary, reported

iv) How the victims, and perpetrators, will be supported

v) Recognises the gendered nature of child-on-child abuse; specifically, the dominance of male-on-female abuse, misogyny, sexist behaviour and harmful attitudes towards women and girls and to put in place, through PSHE and other means such as assemblies, measures to educate and mitigate against it.

vi) Staff should familiarise themselves with the College's separate Child-on-Child Sexual Abuse & Harassment Policy

Safeguarding issues can manifest themselves via child-on-child abuse.

Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between two or more children and within children's relationships (both intimate and non-intimate).

All staff working with children are advised to maintain an attitude of "it could happen here". Staff should recognise that even if there are no reports, it does not mean that child-on-child abuse is not happening, it may be the case that it is just not being reported

This is most likely to include, but may not be limited to:

• Abuse in intimate personal relationships between children.

• Bullying (including cyberbullying).

• 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, jokes and online sexual harassment, or misogynistic messages which may be stand alone or part of a broader pattern of abuse.

• The non-consensual sharing of indecent images*, especially around chat groups, and the sharing of abusive images, nudes, videos and pornography to those who do not want to receive it (see further below).

• 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.

• Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element); and

• Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

4.5.5 Downblousing, which typically refers to the practice of making unauthorized photographs down the top of a female's dress, capturing an image of her breasts. The practice is regarded as a form of sexual fetishism or voyeurism and is similar in nature to upskirting.

The College recognises the gendered nature of child-on-child abuse (i.e., that it is more likely that girls will be "victims" and boys, "perpetrators"). Even if there are no reports in their school it does not mean it is not happening, it may be the case that it is just not being reported. As such, if staff have any concerns regarding child-on-child abuse, they should speak to their designated safeguarding lead (or deputy).

Child-on-child abuse can be associated with factors outside the College and can occur online and face-to-face between two or more children of any age or gender. The College therefore takes a contextual safeguarding approach to managing child-on-child abuse.

Child-on-child abuse is abuse and is never acceptable. The College takes a zero-tolerance approach. It should never be passed off or dismissed as "banter", "part of growing up", "just having a laugh" or "boys being boys".

The College issues and implements a pupil Code of Conduct that emphasises the importance of mutual respect and consideration for all members of the College community

- rewarding / praising kind and considerate behaviour

- challenging intimidating, unkind and inconsiderate behaviour wherever we encounter it, however minor it may appear, issuing sanctions as appropriate

- strongly discouraging and challenging overtly sexualised behaviour or language.

- prohibiting pornography in any form - adopting a zero-tolerance approach to bullying - limiting opportunities for cyber-bullying/abuse by controlling the use of electronic devices in School - using Assemblies, Mentoring Reflections, Boarding House events and PSHE to celebrate and underline the importance of individuality, diversity, and the unconditional value of all humans

- being alert to any behaviour or the development of circumstances which may suggest that bullying / abuse could be more likely to happen (such as: the formation of gangs or assertive cliques; certain pupils appearing to be uncomfortable in the presence of other pupils; overtly sexualised behaviour / use of sexual language)

- and reporting any concerns to a senior member of staff

- publicising to pupils where to go if they are scared, intimidated, or concerned about others' behaviour

*Children need to know that consensual and non-consensual sharing of images is illegal and abusive. The College's approach to pupil's sharing nudes and semi-nudes images and or videos (also known as sexting or youth produced sexual imagery), as well as AI deepfake imagery is that it will be treated as a safeguarding concern.

The DSL will then:

• hold an initial review meeting with appropriate School staff

• interview the young people involved (if appropriate)

• inform parents at an early stage and involve them in the process unless there is good reason to believe that involving parents would put the young person at risk of harm

• 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.

Further guidance can be found in KCSIE 2026 and in the UKCCIS Sharing nudes and semi-nudes: advice for education settings guidance. Where an issue of student behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the College Anti-Bullying and Behaviour policies in the first instance.

4.5.6 **Sexual Violence and Sexual Harassment:**

Sexual harassment and sexual violence can be driven by wider societal factors such as everyday sexist stereotypes and everyday sexist language. Therefore we place emphasis on building a preventative culture through the curriculum. It is important that students develop a good understanding of what makes relationships safe and healthy. "Given the increasing concerns around child sexual abuse and exploitation and the growing risks associated with growing up in a digital world, there is a particularly compelling case to act in relation to pupil safety." (DfE Guidance, Relationship and Sex Education 2020 he College additionally takes on board the Strengthened guidance on identifying and responding to sexual harassment and violence, aligning with the "child-on-child" abuse framework as outlined in KCSIE 2026.).

T

Child-on-Child; Sexual Violence and Harassment:

Child-on-Child sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. We place emphasis on the importance of raising awareness that as a community we have the following expectations:

● Sexual violence and sexual harassment are not acceptable, will never be tolerated and is not an inevitable part of growing up.

● We do not tolerate or dismiss sexual violence or sexual harassment as "banter."

● We will challenge and report behaviour (potentially criminal in nature) that falls short of our Code of Conduct, Boarding Handbook and Student Planner

The College works collaboratively with external organisations to challenge, sanction, record and report behaviours that are exploitative and unsafe in line with the DfE Keeping Children Safe in Education guidelines. “Schools and colleges should be made aware of making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated.”

Serious Violence

There are a number of indicators, which may signal children are at risk from, or are involved in committing serious violence. These may include:
• increased absence from school or college;
• a change in friendships or relationships with older individuals or groups;
• a significant decline in educational performance;
• signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries; and
• unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:
• being male;
• having been suspended, spent time in Alternative Provision or permanently excluded from school;
• having experienced child maltreatment;
• having been involved in offending, such as theft or robbery;
• having used drugs or alcohol in early adolescence,;and
• having previously been a victim or previously perpetrated violence.

Staff should be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from College (in the case of day pupils) and can concentrate in particular places. These times can be particularly risky for young people involved in serious violence. It is important that staff try to understand where these places are, with a view to working with partners to promote safety for children. Listening to children and consulting with staff can help establish when and where they feel unsafe. Working with wider partners can also help build understanding of the local context beyond the school or college and help co-ordinate a collective safeguarding response around the school day.

5. Procedures

The child protection training provided to staff considers the types and signs of abuse and neglect and exploitation staff must be aware of. The types of abuse and neglect, exploitation and examples of specific safeguarding issues are set out in Appendix 2.

5.1 Staff should refer to the guidance in Appendix 3 in the event of receiving a disclosure from a child and for guidance about recording concerns.

5.2 Staff members working with children should maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the **best** interests of the child.

5.3 **If staff are ever unsure of what they should do, they must always speak to the DSL.**

5.4 **Travel & Care Arrangements**

5.4.1 To ensure the safety and whereabouts of our students, its important the College seeks to understand where the student will be travelling to, who they will be accompanied by and their travel arrangements. Residential Tutors should ensure they use the Departure Forms to collate the following information, before a student departs -

- Name and Email address of person completing the form
- Students full name, boarding house & telephone number
- Parent/Guardian name, email address and telephone number
- Confirmation that they agree to the responsibility of the child and will adhere to guidelines from the school.
- Day of Departure
- Details of departure (BHC taxi, self-arranged transport or collected by parent)
- If being collected by a nominated adult, their name, telephone number and relationship to the child. Photo ID should also be sent to the Compliance Officer.
- If using self-arranged transport, the company name, booking reference and departure time. We would also ask for a copy of booking confirmation to be supplied.
- Destination information, including all addresses where the student will reside, the dates they will be at those addresses and the name and contact number of the responsible adult looking after them at that address.
- If the student is travelling overseas, we ask for the flight information for departure, including if they have been booked as an unaccompanied minor, who will collect the student from the airport, their contact number and their relationship with the student. We also ask for the address overseas.

5.4.2 The declaration form must be signed.

5.4.3 Once we have received the requested information, the Residential Tutors, under the leadership of the Head of Boarding will scrutinise the details provided to ensure we are confident our students are being cared for and that the information provided is an accurate reflection of the care and travel arrangements agreed with the parents. If staff need to clarify any information with the parent, we will utilise the telephone log form and save it in the departure details folder for that student within TEAMS.

Early help (Now Family Help)

5.4.4 The College understands that providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges at any point in a child's life, and for children of all ages in order to improve a family's resilience and outcomes or reduce the chance of a problem getting worse. The College will provide help and support to meet the needs of children as soon as problems emerge in line with the latest KCSIE document, incorporating the DfE's 'working together to safeguard children'. The College also notes the reference to 'family help' instead of 'early help' in the latest guidance. The College will, at all times, keep families fully informed of any issues arising, but does so under the assumed process of 'in loco parentis' for our boarding/international community.

5.4.5 The College's safeguarding training includes guidance about the early help process and prepares all staff to identify children who may benefit from early help. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges.

5.4.6 A member of staff or volunteer who considers that a pupil may benefit from early help should in the first instance discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with LRSCP referral threshold document and will support staff in liaising with other agencies and setting up an inter-agency assessment as appropriate.

5.4.7 If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

5.5 **Concerns about a pupil's welfare**

5.5.1 If a member of staff is concerned about a pupil's welfare, the matter should be reported to the DSL as soon as possible. See paragraph 0 and Appendix 4 for the procedures for dealing with allegations against staff and volunteers.

5.5.2 On being notified of a concern the DSL will consider the appropriate course of action in accordance with the LRSCP referral threshold document. Such action may include early help or a referral to children's social care. When a Multi-Agency referral Form (MARF) is used, the following guidance should be followed: -

To download the MARF, use the link to: -

https://lrsb.org.uk/uploads/marf-form.pdf

When completing the MARF, as much detail as possible needs to be provided to support the First Response Team who in turn will require the details to aid the pupil being referred.

Examples: -

- If pupil is self-harming, describe the nature of the harm, frequency of incidents and how serious you feel it is.
- State the College's view…the College knows the pupil far better than children's social services.

- Is the pupil looked after? Is the pupil unkempt? Does the pupil smell of urine? Has the College seen the pupil's home?
- Has the pupil been hit? Was it a punch or slap? Give a timeline if possible and what was the cause of being hit.
- Are there any siblings involved?
- Influencing factors: - Has something happened recently or is there a long-term issue?

Consent may be required from the family for children's social services to be involved via MARF.

- If the College suspects a safeguarding issue, consent is not required.
- What sort of support would benefit the pupil/family?

Take into consideration the thresholds for section 47 of the Children Act 1989 (the pupil has been harmed or is in danger of being harmed) and section 17 of the Children Act 1989 (the pupil is in need)

5.5.3 If it is decided that a referral is not required, the DSL will keep the matter under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

5.5.4 Staff are reminded that normal referral processes must be used when there are concerns about children who may be at risk of being drawn into terrorism.

5.5.5 In accordance with these procedures, if a member of staff has a concern about a child, there should be a conversation with the DSL to agree a course of action where possible. However, any member of staff can make a referral to children's social care. If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

If a child is in immediate danger or at risk of harm

It is a legal requirement in England and Wales for staff in all schools to report safeguarding concerns or allegations of risk of harm to pupils.

Key Legal Frameworks and Duties

- **Keeping Children Safe in Education (KCSIE)**: This is the statutory guidance issued by the Department for Education (DfE). **All school staff** must read at least "Part One" of this document, which explicitly mandates that staff must act immediately if they have a concern about a child's welfare, protection, or safety;
- **The Teachers' Standards**: Under these legally binding professional requirements, teachers must safeguard children's well-being and maintain public trust in the profession; and
- **Mandatory Reporting Duty for FGM**: Under the Female Genital Mutilation Act 2003 (as amended), there is a specific, personal **legal duty on teachers** to report known cases of female genital mutilation (FGM) in girls under 18 directly to the police. See section 6.7.4 below

What Staff Must Report

The legal expectation covers a broad spectrum of safeguarding triggers. Staff are required to identify and report:

- **Signs of Abuse or Neglect**: Emotional, physical, or sexual abuse, as well as severe neglect.
- **Child-on-Child Abuse**: Harm perpetrated by other pupils, including bullying or sexual violence.
- **Radicalisation**: Risks associated with extremist grooming or exploitation.
- **Allegations Against Staff**: Concerns or allegations that an adult working in the school has harmed a child or poses a risk of harm.
- **Low-Level Concerns**: Minor behaviours by staff members that do not meet the direct harm threshold but conflict with the school's code of conduct.

The Standard Reporting Protocol

The College maintains a tight reporting hierarchy to ensure legal duties are met:

1. **Immediate Notification**: Staff must report the concern or allegation to the school's **Designated Safeguarding Lead (DSL)** or a deputy without delay.
2. **Written Record**: The staff member must document the information accurately, including dates, times, and observable facts.
3. **External Referral**: If the harm threshold is met, the DSL is legally responsible for escalating the report to Local Authority Children's Social Care, the Local Authority Designated Officer (LADO), or the police.
4. **Bypassing Authority**: If a staff member believes a concern is not being taken seriously by the school leadership, they are legally empowered and expected to bypass internal channels and report directly to external children's services or the police. See the College's 'whistleblowing policy'

5.5.6 See section 5.6 below for details on making a referral.

5.5.7 If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

Female genital mutilation /breast ironing and Forced Marriage

5.5.8 Teachers must report to the police known cases of female genital mutilation (FGM) in under 18s & discuss with the DSL unless there is a good reason not to. See Appendix 2 for further information about FGM and this reporting duty.

5.5.9 If teachers have suspicions or are concerned that a pupil may be about to be forced into a marriage or may be a victim of forced marriage, their key responsibility is to inform the DSL (the person with designated responsibility for child protection in their school) as soon as possible.

5.6 **Making a referral See 5.6.2 above for guidance**

5.6.1 The relevant contact information is set out at the front of this Policy. If the referral is made by telephone, this should be followed up in writing. It is considered best practice to record who information is passed on to and for what reason. The College will therefore adopt this procedure.

5.6.2 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.

5.6.3 If after a referral the pupil's situation does not appear to be improving, the DSL (or the person that made the referral) should press for reconsideration to ensure their concerns are addressed and that the pupil's situation improves.

5.6.4 Where relevant, the College will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The College will respond to requests for information from the police promptly and in any event within five to ten working days.

Dealing with allegations against teachers, including supply teachers, trainee teachers, the Principal, Directors, volunteers and other staff

6.10.1 The College has procedures for dealing with allegations against teachers, including supply teachers, the Principal, Directors, volunteers and other staff who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures are set out in Appendix 4 and follow Part 4 of KCSIE. Where there is an allegation about a supply teacher: Whilst the College is not the employer of supply teachers, we will ensure allegations are dealt with properly. In no circumstances will The College decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome.

6.10.2 The local authority has designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children (**Designated Officer(s)**). The Designated Officer(s) will be informed immediately and in any event within one working day of all such allegations that come to the College's attention and appear to meet the criteria set out in paragraph 1 of Appendix 4.

6.10.3 Detailed guidance is given to staff, Directors and volunteers to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in Staff Code of Conduct, which is available in Reception, in all staff rooms and on the Smartlog, and which includes detail of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.

6.10.4 Staff and volunteers should also feel able to follow the College's separate Whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices at the College or potential failures by the College or its staff to properly safeguard the welfare of pupils, and that such concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see the front of this policy for the relevant contact details).

5.7 **Allegations against pupils**

5.7.1 The conduct of pupils towards each other will, in most instances, be covered by the College's behaviour and discipline policies. However, some behaviour by a pupil towards another may be of such a nature that safeguarding concerns are raised. Staff should have read the College’s separate policy on Child-on-Child sexual Abuse

and Harassment. Examples of behaviour by a pupil which may raise safeguarding concerns may include:

(a) violence, including gender-based violence.

(b) threatening or intimidating behaviour.

(c) blackmail.

(d) misconduct of a sexual nature, including indecent exposure or touching or serious sexual assaults.

(e) sexting and upskirting & downblousing [including requests for and the transmission of nudes and semi-nudes] and creating/distributing AI 'deepfake' sexualised imagery. (see the College's Policy on the Safe and Acceptable Use of ICT for the College's approach to sexting).

(f) encouraging others to engage in inappropriate sexual behaviour.

(g) any form of inappropriate behaviour by an older pupil towards a younger or more vulnerable pupil.

(h) bullying, including cyberbullying.

5.7.2 The College takes steps to minimise the risk of child-on-child abuse, including sexting and upskirting & downblousing, and creating/distributing AI 'deepfake sexualised imagery. The College has robust anti-bullying procedures in place (see the College's Anti-bullying Policy) and pupils are taught at all stages of the College about acceptable behaviour and how to keep themselves safe. Risk assessments are carried out and appropriate action taken to protect pupils identified as being at risk including risks arising from behaviour in boarding houses (see the College's Risk Assessment Policy for Pupil Welfare.

5.7.3 Abusive behaviour by pupils must be taken seriously. Behaviour should not be dismissed as being normal between young people, as "banter" or simply "part of growing up". Behaviour such as initiation violence or any form of sexual harassment is not acceptable.

5.7.4 Allegations against pupils should be reported in accordance with the procedures set out in this Policy (see sections 0, 5.5 and 0).

5.7.5 A pupil against whom an allegation of abuse has been made may be suspended from the College during the investigation and the College's policy on behaviour, discipline and sanctions will apply. The College will take advice from children's social services and the police on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.

5.7.6 If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the College will ensure that, subject to the advice of children's social care, the pupil's parents are informed as soon as possible, and that the pupil is supported during the interview by an appropriate adult in accordance with the latest guidelines within the Police and Criminal Evidence (PACE) guidance

5.7.7 Where an allegation is made against a pupil, both the victim and the accused will be treated as being at risk and safeguarding procedures in accordance with this Policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services as necessary.

5.8 **Informing parents**

5.8.1 Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Designated Safeguarding Lead will need to consult the Principal, the Designated Officer(s), children's social care and / or the police before discussing details with parents. In all cases, the DSL will be guided by LRSCP referral threshold document. For reference, referrals do not require parental consent. Staff must act in in the best interests of the child, even if this means making a referral against the parents' wishes. In making a referral, and after discussing the matter with LRCSP, attention must be paid to sections 47 and 17 of the Children Act. This will determine if a referral is the correct course of action.

5.8.2 In relation to Channel referrals, the DSL will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

5.8.3 See also section 3 of Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff, volunteer or the Principal of the College.

6. Use of mobile phones and cameras

6.1 The College recognises that unrestricted access to mobile phones and smart technology can present safeguarding risks including cyberbullying, online grooming, child-on-child abuse, exposure to harmful content, the sharing of nudes and semi-nudes, AI-generated imagery and other forms of online exploitation. Certain areas, activities and times of the College day may therefore be designated as mobile phone-free. Any misuse of mobile technology which places a child at risk will be treated as a safeguarding concern. The College's policy on the use of mobile phones and cameras in the College, is as follows:

6.1.1 The College's Policy on the Safe and Acceptable Use of ICT sets out the expectations on pupils. This includes expectations with regard to online safety and use of the internet and how the college acts to minimise threats to the safety and/or welfare of pupils

6.1.2 Staff and volunteers should use mobile phones and cameras in accordance with the guidance set out in the staff Code of Conduct.

7. Record keeping, confidentiality and information sharing Including pupil voice

7.1 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

7.2 Staff must record all concerns about a child on the College's pro forma Recording Form for Safeguarding Concerns which is available at Appendix 5 of this policy and also on Smartlog,

at Reception, in all staff rooms and from the DSL on request. Guidance on record keeping is set out in Appendix 3.

7.3 The DSL will open a child protection file following a report to them of a child protection concern about a pupil. The DSL will record all discussions with both colleagues and external agencies, decisions made and the reasons for them and detail of the action taken.

7.4 The College will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The College will co-operate with police and children's social care to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989. For the purposes of full disclosure of information, the College do not need consent to share personal information provided that there is a lawful basis to process any personal information required. The College will adopt this approach whilst still adhering to point 3.2 of appendix 4. Pupils' privacy matters are covered in the Children's Code for privacy, which comes into law Sept. 2021. The college's Children's Code is available within the policy file and on the College's website.

7.5 Where allegations have been made against staff, the College will consult with the Designated Officer(s) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

8.6 **Holding and sharing information**

The designated safeguarding lead has been suitably trained to:

• understand the importance of information sharing, both within the College, and with other schools on transfer including in-year and when pupils change schools, and with the local safeguarding partners, other agencies, organisations and practitioners.
• understand relevant data protection legislation and regulations, especially the Data Protection Act 2018; and
• be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

- Keep written records of all concerns, discussions and decisions including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme.

- Keep all such records in a safe and secure location along with individual safeguarding files, the annual audit and the annual safeguarding report.

8.7 **Understanding the views of children**

The College understands that it is important that children feel heard and understood. Therefore, The College has a series of forums to gather the views of our pupils. Each house has a 'House Council'. These councils feed into the 'College Council', where the Head of Boarding will:

• encourage a culture of listening to children and taking account of their wishes and feelings, and in any measures the school or college may put in place to protect them; and

• understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate

communication.

8.7.1 In addition to the House and College Councils, the College's Director of Pastoral Care, Head of Boarding & Assistant Head of Boarding meet regularly, the girls in particular, but all pupils in general, in the light of the testimonies published on the 'Everyone's Invited' website. Whilst no evidence [as demonstrated by the findings of the College Wellbeing Staff] has been found of a culture of abuse, as outlined in the testimonies, all College safeguarding polices have been produced assuming "it could happen here" (see 5.3 above) in the College and that measures have been put in place to negate or at least minimise the risks involved.

8. Private Fostering

8.1 A private fostering arrangement is when a child under 16 (or under 18 if the child has a disability) is being cared and is living with someone else. That person is someone who is not a close relative for example a grandparent, stepparent, brother or sister, aunt or uncle. The relative can be half blood, full blood or by marriage. It is an arrangement where care is intended to last more than 28 days. Any private fostering arrangement details must be provided at the point of enrolment and prior to arrival at the College. Brooke House College will make a referral to social care prior to the child's arrival and the LA will a) check that the person who is caring is able to fulfil that role b) check that the accommodation is suitable for the young person. Brooke House will advise the LA of the child's intended date of arrival at the College.

9. Monitoring and review

9.1 The Principal & Designated Safeguarding Lead will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with the Board of Directors as necessary and seeking contributions from staff. The DSL will update the Senior Management Team regularly on the operation of the College's safeguarding arrangements.

9.2 Any child protection incidents at the College will be followed by a review of these procedures by the DSL and a report made to the Board of Directors. Where an incident involves a member of staff, the Designated Officer(s) will be asked to assist in this review to determine whether any improvements can be made to the College's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.

9.3 The full Board of Directors will undertake an annual review of this Policy and the College's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. The DSL will work with the Nominated Safeguarding Director, preparing a written report commissioned by the full Board of Directors. The written report should address how the College ensures that this Policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the College and how these have been handled; and the contribution the College is making to multi-agency working in individual cases or local discussions on safeguarding matters.

The full Board of Directors, when undertaking the annual review, policies and safeguarding procedures may also consider independent corroboration, such as inspection of records or feedback from external agencies including the Designated Officer(s). The full Board of Directors will review the report, this Policy and the implementation of its procedures and

consider the proposed amendments to the Policy before giving the revised Policy its final approval. Detailed minutes recording the review by the Board of Directors will be made.

Authorised by	resolution of the Board of Directors
Signed Joan Williams On behalf of the Board of Directors **Date**	August 2026

Schedule of Updates

Date document updated	Document updated by	Summary update/comments	Location of saved file
October 2016	SD / MCO / RP	Update as part of the Spring/Summer 2016 review of policies and compliance. Updated in line with KCSIE 2016.	Dropbox – SMT – Policies Final
October 2016	RP	Minor amends on VWV advice and in accordance with LG email to RP dated 21 Oct.	Dropbox-SMT-Policies Final
February 2017	MCO	Additions to FGM to take into account tattoos of genitalia etc. and teachers working as volunteers	Dropbox-SMT-Policies Final
February 2017	SD	Update definition of CSE in line with Home Office revision	Dropbox-SMT-Policies Final
May 2017	SD	Additions as recommended further to visit of J.Wood/ ISA Compliance Check	Dropbox-SMT-Policies Final
July 2017	SD	Point 8 Private Fostering added as per Leicestershire County Council Termly Safeguarding Briefing for Schools	Dropbox - SMT Policies Final
September 2018	MCO	Updates in response to changes in KCSIE 2018, Working together to safeguard children 2018, Data	Dropbox - SMT Policies Final

		Protection Act 2018, and DfE guidance on peer-on-peer sexual abuse and sexual harassment	
October 2018	MCO	Updates in response to changes in Multi-Agency Statutory Guidance on FGM	Dropbox - SMT Policies Final
February 2019	MCO	Updates in response to WT amendment Feb 2019	Dropbox - SMT Policies Final
July 2019	MCO	Updates in response to KCSIE 2019 amendments, teaching online safety guidance	Dropbox - SMT Policies Final
September 2019	MCO	Updated in response to further guidance on 'county lines' matters & Final KCSIE version	Dropbox - SMT Policies Final
July 2020	MCO	Updated in response to KCSIE 2020 & ISA compliance check	Dropbox - SMT Policies Final
January 2021	MCO	Updated in response to changes in 'Working Together' document	Dropbox - SMT Policies Final
April 2021	MCO	Updated in response to peer-on-peer abuse matters	Dropbox - SMT Policies Final
July 2021	MCO	Updated in response to Ofsted review into Everyone's Invited, KCSIE 2021 & WTSC	Dropbox – SMT Policies 2021-2022
Aug 2022	IMS	KCSIE Sept 2022 – Sexual Harassment (Everyone's Invited), Preventative Education, Protected Characteristics, Peer-on-Peer Abuse migrates to Child-on-Child Abuse. Aug 22 review of DSL/DDSL Team.	
Aug 2023	IMS	KCSIE Sept 2023 Meeting digital & technology standards in schools & colleges (March 2023)	MS TEAMS/Policies
May 2024	EC/ML	UKVI recommendations and KCSIE 2023 guidance	MS TEAMS/Policies
Aug 2024	IMS	KCSIE 2024	MS TEAMS/Policies
Aug 2025	IMS/DSL	KCSIE 2025	MS Teams/Policies
May 2026	MCO	Advisory Board review of policies	MS Teams/Policies

Schedule of Review

Date of document review	Reviewed by	Scheduled date of next review
July 2017	SD	July 2018
September 2018	MCO/SD	July 2019
July 2019	MCO/SD	July 2020
July 2020	MCO/SD	July 2021
July 2021	MCO/SD	July 2022
Aug 2022	IMS/SD	Aug 2023
Aug 2023	IMS/SD	July 2024
Aug 2024	IMS/DSL	July 2025
July 2025	IMS/DSL	July 2026

Appendix 1 The Designated Safeguarding Lead

1 The DSL for the College site is Nick Owens, who is the Director of Pastoral Care and who may be contacted on **07510 368878**.

2 The Deputy DSL is Linda Mugadzaweta, who is the College Nurse and Constantin Leonte, the Head of Boarding who may be contacted on 01858 434245 or 07702 515445 and 07702515441 respectively. Please note the Deputy DSL is qualified to the same level as the DSL & holds a Designated Safeguarding Lead training certificate issued by Leicestershire County Council. In the event the DSL or the deputies are unavailable, referrals should be made to the Principal and then if the Principal is unavailable the designated director for safeguarding.

In accordance with Annex B of KCSIE, the main responsibilities of the DSL are:

2.1 **Managing referrals**

(a) The DSL is expected to:

(i) refer cases of suspected abuse to the local authority children's social care as required.

(ii) support staff who make referrals to the local authority children's social care.

(iii) refer cases to the Channel programme where there is a radicalisation concern as required.

(iv) support staff who make referrals to the Channel programme.

(v) refer cases where a person is dismissed or has left due to risk / harm to a child to the Disclosure and Barring Service as required.

(vi) For referrals to the Teacher Regulation Agency (TRA), these may be made by:

- A teacher's employer, including an employment or supply agency.
- members of the public who think that a case of misconduct by a teacher is serious enough to warrant a prohibition order
- The Police.
- the Disclosure and Barring Service (DBS) and other regulators who are aware of relevant information

(vii) refer cases where a crime may have been committed to the Police as required.

2.2 **Work with others**

(a) Liaising with the Principal to inform him of issues especially ongoing enquiries under section 47 and 17 of the Children Act 1989 and police investigations.

(b) As required, liaise with the Case Manager (see Appendix 4 of this policy) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member);

(c) Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

(d) Liaise with Estate Manager & IT Provision to understand the filtering & monitoring systems and processes in place to safeguard pupils in College's care. Update the SLT on online safety practices & performance of the College's Filtering & Monitoring arrangements.

(e) Be responsible for educating the pupils about the 4 Cs of online safety through the PSHE/RSHE programme. The 4Cs being:

Content, **Contact**, **Conduct**, and **Commerce**. These categories help schools identify, understand, and mitigate potential online dangers to children and young people.

- **Content:** Exposure to inappropriate, harmful, or illegal material, including:
  - Pornography
  - Misinformation, disinformation, and conspiracy theories
  - Racism, misogyny, and hate speech
  - Self-harm and suicide content
  - Radicalisation and extremism
- **Contact:** Harmful interactions with other users:
  - Grooming
  - Peer-to-peer pressure
  - Exploitation
- **Conduct:** Online behaviour that causes harm, such as:
  - Cyberbullying
  - Sending or receiving nudes and semi-nude images
  - Violent or aggressive behaviour
- **Commerce:** Risks related to financial transactions and exploitation:
  - Online gambling
  - Phishing and scams
  - Inappropriate advertising

2.3 **Raise awareness**

(a) The DSL should ensure this Policy is known, understood and used appropriately.

(b) Ensure this Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Board of Directors regarding this.

(c) Ensure this Policy is available publicly.

(d) Ensure that parents are aware that referrals about suspected abuse or neglect may be made to children's social care and the College's role in this.

(e) Maintain links with the Leicestershire and Rutland safeguarding partnerships to ensure staff are aware of training opportunities and the local policies on safeguarding.

2.4 **Child protection file**

(a) Where children leave the College ensure their child protection file is sent to any new school or college as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt will be obtained. It is no longer a legal requirement for the school to keep a copy of this file other than for reasons of compliance of the Data Protection Act 2018 and the college's data retention policy

2.5 **Prevent**

(a) In accordance with the Prevent Duty Guidance for England and Wales and Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) the DSL has, in addition, the following responsibilities:

(i) Acting as the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty.

(ii) Co-ordinating Prevent duty procedures in the College.

(iii) Liaising with local Prevent co-ordinators, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and/or the police where indicated.

(iv) Undergoing WRAP or other appropriate training.

(v) Maintaining ongoing training programme for all school employees including induction training for all new employees and keeping records of staff training; and

(vi) Monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty.

3 **Availability**

4.1 During term time the designated safeguarding lead (or a deputy) will always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, the College has established the definition that working with the designated safeguarding lead and what "available" means allows in exceptional circumstances availability via phone and/or FaceTime or other such medium as being acceptable. (Teams or Zoom). Cover will always be made available during term time working hours in accordance with the latest guidance within KCSIE 2026.

4 The DSL and the Deputy DSL have undertaken training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent awareness training and will be updated at least every two years. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

4.1 understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.

4.2 have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.

4.3 can contribute to inter-agency working in line with *Working Together to Safeguard Children 2024 and* through effective communication and good co-operation with local agencies.

4.4 ensure each member of staff has access to and understands the College's child protection policy and procedures, especially new and part time staff.

4.5 are alert to the specific needs of children in need, those with special educational needs and young carers.

4.6 are able to keep detailed, accurate, secure written records of concerns and referrals.

4.7 understand and support the College with regard to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.

4.8 obtain access to resources and attend any relevant or refresher training courses.

4.9 encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them.

Appendix 2 Types and signs of abuse and specific safeguarding issues

1 **Types of abuse**

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

1.2 KCSIE defines the following types of abuse, however, staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another.

1.3 **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.

1.4 **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 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.

1.5 **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 or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

1.5.1 Where consenting, underage pupils have engaged in a sexual act, and it is clear no laws have been broken, there is no legal obligation to report the underage sex unless exploitation or abuse is suspected. Assessment of such actions of the pupils would be subject to Gillick Competency and Fraser Guidelines. However, a breach of College regulations would have taken place and as such the pupils concerned would be subject to 'school rules'.

1.6 **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. Neglect could also occur as a result of homelessness. In such cases the College would report the neglect to the appropriate authorities under its obligation to section 213 B of the Housing Act 1996

1.7 **Domestic Abuse:** Domestic abuse is a vastly under reported crime affecting one in three women and one in six men. Two women are still killed on average every week by their partner or ex-partner. It is rarely a one-off event and in most cases the abuse escalates over time. Around three quarters of the children or young people who have had a child protection plan have experienced domestic abuse. Domestic violence is experienced in all communities, in all socio-economic groups, by LGBT people as well as in heterosexual relationships and by people of all ages. The definition of emotional harm recognises that children and young people are affected not only by experiencing violence themselves but also by witnessing harm to others. Threatening, controlling, belittling behaviours are domestic abuse as well as physical harm. Children living in households where domestic violence is happening are now identified as "at risk" under the Adoption and Children Act 2002. From 31 January2005, Section 120 of this act extended the legal definition of harming children to include harm suffered by seeing or hearing ill treatment of others. This would include witnessing domestic abuse. The College aims to provide a safe retreat from problems at home. However, some day pupils may avoid coming to school to stay home to protect their parent or siblings, whilst some boarders may display changes of character knowing what might be going on at home.

Controlling or coercive behaviour. Also known as coercive control, the use of control and coercion in relationships is a form of domestic abuse and, since December 2015, a criminal offence. Controlling and coercive behaviour is outlined in Government guidance issued under section 77 of the Serious Crime Act 2015 as part of the Government's non-statutory definition of domestic violence and abuse. It is described as:

• Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour; and

• Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim Coercive control is a form of abuse that involves multiple behaviours and tactics which reinforce each other and are used to isolate, manipulate and regulate the victim. This pattern of abuse creates high levels of anxiety and fear. This has a significant impact on children and young people, both directly, as victims in their own right, and indirectly due to the impact the abuse has on the non-abusive parent. Children may also be forced to participate in controlling or coercive behaviour towards the parent who is being abused. Controlling or coercive behaviour also form part of the definition of domestic abuse in section 1(3)(c) of the Domestic Abuse Bill.

In addition to the core title of abuse, we highlight other specific risks below, which our staff are also made aware of.

1.8 Specific Safeguarding Risks & Contextual Harm

- **Child-on-Child Abuse:** Abuse between peers, including bullying, cyberbullying, sexual violence, and harassment.
- **Online Abuse:** Sexual exploitation, grooming, and exposure to harmful content, including apps and social media platforms.
- **Child Criminal/Sexual Exploitation:** Exploitation for sex or crime, such as county lines grooming.
- **Domestic Abuse:** Children witnessing or experiencing violence/coercive control at home.
- **Radicalisation (Prevent Duty):** Protecting children from extremist ideologies and being drawn into terrorism.
- **Harmful Practices:** Including Female Genital Mutilation (FGM), honor-based abuse, and forced marriage.
- **Mental Health and Self-Harm:** Identifying behavioural issues, eating disorders, and self-harm.

1.9 Additional Safety Concerns

- **Child Missing from Education:** Following up on unexplained absences to prevent safeguarding risks.
- **Staff Misconduct:** Allegations against staff, volunteers, or supply teachers.
- **Discriminatory Abuse:** Prejudice-based abuse, including racist, sexist, homophobic, or transphobic bullying.
- Children questioning their gender

1.9.1 The College will follow its Transgender policy, which takes into account the 'Supreme Court' ruling on the subject as well as the latest DfE guidance on ' Gender-Questioning Children (2026) . The key features of which are:-

- they have a right to know about decisions regarding their child's gender expression.
- **Cautious Approach:** The College will be sensitive to social transition (e.g., changing names, pronouns, uniforms) should not be rushed and should be considered with high caution due to potential long-term psychological effects.
- **Non-Automatic Changes:** Teachers are not required to automatically agree to social transition requests, such as changing a child's name or pronouns., but will be sensitive to the situation.
- **Biological Sex Focus:** The College will be mindful with regard to single-sex spaces (toilets, changing rooms) and sports should be based on biological sex in accordance with the Supreme Court's judgement.
- **Flexibility & Safety:** While aiming to provide a supportive environment, the College aims to give flexibility in ensuring both inclusion and the protection of all pupils.

- **Parental Involvement:** The College will engage parents, as 1.10 include where they see, hear or experience its effects.

Disclosure Where domestic abuse is disclosed, staff must follow Safeguarding Procedures. Namely:

- Don't question or interrogate the young person. This is the role of the police or social services.
- Offer reassurance and explain what will happen next.
- Write down what has been said, what you have seen and what you may already know and share this promptly with your school Designated Safeguarding Lead (DSL). Date and sign all records.
- DSL to consider immediate risk of harm and, as appropriate, contact or refer to First Response/LADO, contact non abusing parent or carer if safe to do so, or police or Domestic Violence contact numbers.

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

2 Signs of abuse

2.1 Possible signs of abuse include, but are not limited to:

2.1.1 the pupil says he / she has been abused or asks a question or makes a comment which gives rise to that inference

2.1.2 there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries

2.1.3 the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour

2.1.4 the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons

2.1.5 the pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing

2.1.6 the pupil appears neglected, e.g., dirty, hungry, inadequately clothed

2.1.7 the pupil is reluctant to go home, or has been openly rejected by their parents or carers and

2.1.8 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one to one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

2.1.9 KCSIE requires all staff to be alert to indicators that may signal that children are at risk from, or involved with, serious violent crime related to 'County Lines' activity. Such indicators include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing
- signs of assault or unexplained injuries
- unexplained gifts or new possessions

"Criminal Exploitation of children and vulnerable adults": County Lines guidance offers further advice.

2.2 The Leicestershire and Rutland safeguarding partnerships can provide advice on the signs of abuse and the DfE advice 'What to do if you're worried a child is being abused' (2015) provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice.

3 Children with Specific safeguarding issues that should raise concerns

3.1 KCSIE acknowledges the following as specific safeguarding issues:

3.1.1 bullying including cyberbullying

3.1.2 children missing education (see section 3.2 below)

3.1.3 children missing from home or care

3.1.4 child sexual exploitation (see section 3.3 below)

3.1.5 domestic violence

3.1.6 drugs

3.1.7 fabricated or induced illness formerly Munchausen by proxy

3.1.8 faith abuse

3.1.9 female genital mutilation (FGM) (see section 3.4.2 below)

3.1.10 forced marriage (see section 3.4.3 below)

3.1.11 gangs and youth violence including 'Knife Crime'

3.1.12 gender-based violence / violence against women and girls (VAWG)

3.1.13 hate

3.1.14 homelessness

3.1.15 mental health

3.1.16 missing children and adults' strategy

3.1.17 private fostering

3.1.18 preventing radicalisation (see section 3.5 below)

3.1.19 relationship abuse

3.1.20 sexting [including upskirting, downblousing, requests for or the transmission of nudes and semi-nudes] and the creation/distribution of AI 'deepfake' sexualised imagery.

3.1.21 modern slavery and trafficking (see section 3.9 below)

3.1.22 any issues involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons, which relate to abuse across 'county lines'

3.1.23 Child-on-Child abuse or Harassment

3.1.24 Children with Medical Conditions, including SEND.

3.1.25 Child to parent or child to carer abuse (Care leavers)

3.1.26 Young carers

3.1.27 Children who need a social worker

3.1.28 Children in elective home education

3.1.29 Looked after children

3.1.30 LGBTQ+ children

3.1.31 Children questioning their gender.

Staff training will alert colleagues as to what signs to expect from any on the above and how to deal with them. Some are specifically highlighted below for further reinforcement.

3.2 **Children missing education (**unexplained and or persistent absences)

3.2.1 The College shall inform the local authority of any pupil who is going to be added to or deleted from the College's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2024.

3.2.2 This will assist the local authority to:

(a) fulfil its duty to identify children of compulsory school age who are missing from education; and

(b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

3.2.3 The College shall inform the local authority of any pupil who:

(a) fails to attend College regularly; or

(b) has been absent without the College's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the College

and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

3.2.4 College attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this Policy if any absence of a pupil from the College gives rise to a concern about their welfare. Ref KCSIE .See also Missing pupils' policy

3.3 **Child sexual exploitation**

3.3.1 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. 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. (Government definition of CSE, Working Together to Safeguard Children 2026)

3.4 **Honour- based violence**

3.4.1 All forms of so-called honour-based violence are abuse (regardless of motivation) and should be handled and escalated as such. Staff should speak to the Designated Safeguarding Lead if they have any doubts.

3.4.2 **Female genital mutilation (FGM) and breast ironing**

(c) FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Likewise with breast ironing.

(d) There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, in the Multi-agency statutory guidance on FGM [updated 2024]

(e) All staff must be aware of the requirement for teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM/genital piercing/genital tattoo/non-medical indicated genital surgery and breast ironing appears to have been carried out on a girl under 18. The report should be made orally by calling 101, the single non-emergency number. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

(f) If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance Mandatory Reporting of Female Genital Mutilation - procedural information for further details about the duty. Note: the mandatory

reporting duty does not apply to any voluntary work carried out by teachers and other relevant professionals

(g) Guidance published by the Department for Health also provides useful information and support for health professionals which will be taken into account by the College's medical staff.

3.4.3 **Forced marriage**

(a) Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form or coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

(b) Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage.

(c) Staff should speak to the Designated Safeguarding Lead if they have any concerns. Pages 32-36 of the Multi-agency guidelines: Handling case of forced marriage focus on the role of schools in detecting and reporting forced marriage and the Forced marriage Unit can be contacted on 020 7008 0151 or fmu@fco.gov.uk for advice and information.

3.5 **Radicalisation and the Prevent duty**

3.5.1 The College has a legal duty to have due regard to the need to prevent people from becoming terrorists or supporting terrorism.

3.5.2 The College aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The College is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

3.5.3 The College has adopted the Government's definitions for the purposes of compliance with the Prevent duty:

Extremism: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas"

Radicalisation: "the process of a person legitimising support for. Or use of terrorist violence"

3.5.4 There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. College staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

3.5.5 Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2025) notes the following:

There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances.

i). Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists.
- changing their style of dress or personal appearance to accord with the group.
- day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause.
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause.
- possession of material or symbols associated with an extremist cause (e.g., the swastika for far-right groups);
- attempts to recruit others to the group/cause/ideology; or
- communications with others that suggest identification with a group/cause/ideology.

ii). Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills.
- using insulting or derogatory names or labels for another group.
- speaking about the imminence of harm from the other group and the importance of action now.

- expressing attitudes that justify offending on behalf of the group, cause or ideology.

- condoning or supporting violence or harm towards others; or

- plotting or conspiring with others."

3.5.6 Protecting children from the risk of radicalisation is part of the College's wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

3.5.7 The DfE's briefing note The use of social media for on-line radicalisation (2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

3.6 **Mental Health**

3.6.1 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.

3.6.2 Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

3.6.3 Where children have suffered abuse and neglect and exploitation, 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.

3.6.4 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

3.7 **Child-on-Child Abuse**

3.7.1 All staff should be aware that children can abuse other children (often referred to as peer-on-peer abuse). And that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of child-on-child peer abuse and know how to identify it and respond to reports.

3.7.2 All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to the designated safeguarding lead (or deputies DDSLs).

3.7.3 It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” 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.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting.
- kicking.
- shaking.
- Biting.
- hair pulling; or
- otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).

3.7.5 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).

3.7.6 sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.

3.7.7 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.

3.7.8 consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);

3.7.9 upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm and downblousing, which typically involves taking a picture without permission, with the intention of viewing their breasts to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

3.7.10 initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff should be clear as to the College's policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

3.8 **Serious violence (See 4.5.6 above)**

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

- increased absence from school.
- a change in friendships or relationships with older individuals or groups.
- a significant decline in performance.
- signs of self-harm or a significant change in wellbeing; or
- signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

3.9 **Modern Slavery and Trafficking**

Modern slavery and human trafficking can take on many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Children may be trafficked into the UK from abroad or moved around the country. Staff need to be aware of indicators which include, but not limited to, neglect, isolation, poor living conditions, having few personal belongings and a lack of trust and reluctance to seek help. Staff will refer any concerns to the DSL without delay who will take action and also refer victims to the National Referral Mechanism (https://www.modernslavery.gov.uk/start).

Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland Version 3.8 refers.

4 Special educational needs and disabilities

4.1 The College welcomes pupils with special educational needs and disabilities and will do all that is reasonable to ensure that the College's curriculum, ethos, culture, policies, procedures, and premises are made accessible to everyone. See the College's Policy on Special Educational Needs and Learning Difficulties and Disability Policy.

4.2 Additional barriers can exist when detecting the abuse or neglect of pupils with a special educational need or disability creating additional safeguarding challenges for those involved

in safeguarding and promoting the welfare of this group of children. The College is mindful that:

4.2.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's special educational need or disability without further exploration.

4.2.2 pupils with a special education need or disability can be disproportionately impacted by bullying without outwardly showing any signs; and

4.2.3 there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

5 Child Criminal Exploitation (CCE)

5.1 Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through **county lines**, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

5.2 Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. Staff need to be aware of 'county lines' activity amongst all pupils, particularly our day pupils, but need to be mindful of boarders being involved as well.

6.0 Children with Medical Conditions

6.1 Children with medical conditions may be more vulnerable to abuse, neglect or exploitation and may face additional barriers to recognising, disclosing or communicating concerns. Medical conditions can affect a child's attendance, wellbeing, emotional health and ability to access support, and in some cases may increase dependence on adults or peers. Staff should remain vigilant to any safeguarding concerns involving children with medical conditions and ensure that their needs are appropriately considered when assessing risk, providing support and making referrals. Any concerns should be reported to the Designated Safeguarding Lead (DSL) in accordance with this policy.

7.0 Child on parent / Carer

7.1 The College recognises that child-on-parent/carer abuse is a safeguarding issue and may involve physical, emotional, psychological, verbal or coercive behaviour towards a parent or carer. Any concerns should be reported to the DSL so that appropriate support and intervention can be considered for the child and family

8.0 Young Carers

8. 1 The College recognises that young carers may face additional safeguarding vulnerabilities, including social isolation, poor attendance, emotional wellbeing concerns and barriers to accessing support. Staff should remain alert to indicators that a pupil may have caring responsibilities and refer any concerns to the DSL so that appropriate support can be considered.

6. Online safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. The College has a whole school approach to online safety, which empowers the College community to protect and educate pupils, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The College's Acceptable Use of ICT Policy outlines the procedures the College follows in greater detail, but the key features are listed below: -

6.1 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
• **content**: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
• **contact**: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
• **conduct**: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
• **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

6.2 The College's approach to online safety reflects the practices expressed in the Child Protection & Safeguarding policy. Considering the 4Cs (Content, Contact, Conduct & Commerce above) to provide the basis of an effective online policy. The College includes within its acceptable use of ICT policy the use of mobile and smart technology and the steps the College takes to educate our pupils, who in a great many cases have unlimited and unrestricted access to the internet via mobile phone networks (i.e., 3G, 4G and 5G). This access means some pupils, whilst at the College, have the means to sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. College Staff have the responsibility to report any inappropriate use of ICT to the DSL. Our PSHE programme contains many detailed lessons on the acceptable use of such devices. The topic is also addressed within the Child-on-Child Sexual Abuse & Harassment Policy.

6.3 Filters and monitoring

The College aims to follow the monitoring and filtering standards as laid out by the DfE:- Namely, content without unreasonably impacting teaching
and learning; and
• have effective monitoring strategies in place that meet their safeguarding needs.

It does so in the following way:-

All wireless networks to which students have access are filtered and monitored by a cloud-based service call SECURLY which enables the College to block any network users from accessing inappropriate or harmful website material by both content and category. Among other categories, these include pornography, radicalisation, gambling, weaponry and drugs. The SECURLY system also blocks unwelcome intrusions from Malware, Botnet and phishing attacks across the network. The filter logs are checked each week by Ark Solutions, the College's ICT provider, to ensure that the system is working adequately. The DSL reports to SLT on a regular basis. All email communications from College accounts made from computers owned by the College are capable of being monitored by the Managing Director, Principal and Chief Operating Officer.

• identify and assign roles and responsibilities to manage filtering and monitoring Systems;
• review filtering and monitoring provision at least annually;
• block harmful and inappropriate

Appendix 3 Guidance for staff and volunteers on suspecting or hearing a complaint of abuse or neglect.

1 **Receiving a disclosure**

1.1 A member of staff or volunteer suspecting or hearing a complaint of abuse or neglect:

1.1.1 must listen carefully to the child and keep an open mind. The member of staff should not take a decision as to whether the abuse has taken place.

1.1.2 must not ask leading questions, i.e., a question which suggests its own answer.

1.1.3 must reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass on the information in accordance with this Policy so that the correct action can be taken; and

1.1.4 must keep a sufficient written record of the conversation. The record should include:

(a) the date and time.

(b) the place of the conversation; and

(c) the essence of what was said and done by whom and in whose presence, and must be signed by the person making it, using names and not initials. A record must also be kept of who the written record is distributed to and for what reason.

1.2 All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record (see below) and passed on when reporting the matter in accordance with this Policy.

2 **Recording the concern**

2.1 Staff must record all concerns (including low level concerns: - see below) about a child in writing.

2.2 Records should be factual and signed and dated, with the name of the signatory clearly printed in writing. Records should include:

2.2.1 the child's details: name, date of birth, address, and family details.

2.2.2 date and time of the event / concern.

2.2.3 the action taken and by whom.

2.2.4 the name and position of the person making the record.;

2.2.5 The name and position of the person receiving the record and for what reason.

2.3 The College has a pro forma Recording Form for Safeguarding Concerns which should be completed and passed on when reporting the matter in accordance with this Policy. This pro

forma is available Appendix 5 of this policy. The record can be completed after an initial discussion with the DSL and completed with the DSL where appropriate.

2.4 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 set out in section 47 & 17 of the Children Act. 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 staff working on behalf of the College may have acted in a way that:

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

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

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

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings. A more complete annex to this policy for low-level concerns can be found in appendix 8

Appendix 4 Dealing with allegations against teachers, the Principal, Directors, volunteers, and other staff

1 The College's procedures

1.1 The College's procedures for dealing with allegations made against staff will be used where the teacher, the Principal, Director, volunteer, or other member of staff has:

1.1.1 behaved in a way that has harmed a child or may have harmed a child.

1.1.2 possibly committed a criminal offence against or related to a child.

1.1.3 behaved towards a child or children in a way that indicates they would pose a risk of harm if he or she works regularly or closely with children; or

1.1.4 Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

1.2 Any allegations not meeting these criteria will be dealt with in accordance with the LRSCP procedures. Advice from the Designated Officer will be sought in borderline cases. Such cases would then be dealt with following the College's internal disciplinary procedures with reference to the Staff Handbook, Staff Contract & Staff Code of Conduct, where appropriate.

1.3 All such allegations must be dealt with as a priority without delay. The Designated Officer(s) will be informed immediately and in any event within one working day of all allegations that come to the College's attention and appear to meet the criteria in paragraph 1.1 above.

1.4 Allegations against a teacher who is no longer teaching and historical allegations will be referred to the police.

2 Reporting an allegation

2.1 The reporting requirements for allegations against a teacher, the Principal, Director, College Advisor, volunteer, or other member of staff are set out below. In all cases, the member of staff making the allegation may consider discussing their concerns with the DSL and making a referral via them. The only circumstances in which this would not be appropriate are if the allegation is against the DSL.

2.2 Where an allegation or complaint is made against any member of staff (other than the Principal), the Designated Safeguarding Lead or a volunteer, the matter should be reported immediately to the Principal. The allegation will be discussed immediately with the Designated Officer(s) before further action is taken. The Principal will not undertake any investigation without prior consultation with the Designated Officer. Where appropriate, the Principal will consult with the Designated Safeguarding Lead. Where an allegation or complaint is made against the Principal, the matter should be reported immediately to the Nominated Safeguarding Director, without first notifying the Principal. The allegation will be discussed immediately with the Designated Officer(s) before further action is taken. The Directors of Brooke House College are all members of the Williams family, and the Nominated Safeguarding Director is Mrs Joan Williams, a member of that family.

The Directors recognise the potential for conflicts of interest to arise where allegations are made against fellow family members. Therefore, any allegation made against any Director should be reported directly to the local authority Designated Officer(s) [LADO]. In these circumstances, it would normally be appropriate for the reporting member of staff to liaise with the DSL.

2.3 The Directors have appointed College Advisors to sit on the Board of Directors in an advisory capacity. Where an allegation is made against a College Advisor, the matter should be reported to the Nominated Safeguarding Director. The allegation will be discussed immediately with the Designated Officer(s) before further action is taken. If it is not possible to report to the Principal or Nominated Safeguarding Director in the circumstances set out above, a report should be made immediately to the Designated Safeguarding Lead. The Designated Safeguarding Lead will act in accordance with these procedures and will as soon as possible inform the Principal or, where appropriate, the Nominated Safeguarding Director and/or the other Designated Officers.

2.4 The person acting in accordance with the procedures in this Appendix is known as the "Case Manager". The person making the report of the concern or allegation is the “reporting member of staff” or the “reporting party”.

2.5 It should be noted that the Data Protection Act 2018 and associated regulations falling under the umbrella of ‘GDPR’ do not prevent or limit the sharing of information for the purposes of keeping children safe. This extends to third party practitioners being allowed to share information without consent.

3 **Disclosure of information**

3.1 The Case Manager will inform the accused person of the allegation as soon as possible after the Designated Officer(s) has been consulted.

3.2 The Parents or carers of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. They may also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

3.3 Where the Designated Officer(s) advises that a strategy discussion is needed, or the police or children's social care need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

3.4 The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed. The College will make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the accused person is charged with an offence, or the DfE/ Teaching Regulation Agency [TRA]) publish information about an investigation or disciplinary case.

3.5 For the purposes of full disclosure of information, the College do not need consent to share personal information if there is a lawful basis to process any personal

information required. The College will adopt this approach whilst still adhering to point 3.2 of this appendix.

4 **Further action to be taken by the College.**

4.1 A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The College will act in accordance with Part four of KCSIE and the College's employment procedures. Suspension of a staff member will be carried out in conjunction with the Designated Officer and in accordance with HR regulations.

4.2 Where a member of boarding staff is suspended pending an investigation of a child protection nature, arrangements for alternative accommodation away from children will be made for the member of staff.

5 **Ceasing to use staff.**

5.1 If the College ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement agreement (formerly known as a compromise agreement) will not be used and a referral to the Disclosure and Barring Service will be made promptly if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within the College, with a report being presented to the Board of Directors without delay.

5.2 If a member of staff or volunteer tenders their resignation, or ceases to provide their services, any child protection allegations will still be followed up by the College in accordance with this policy and a referral to the Disclosure and Barring Service will be made promptly if the criteria for referral are met.

5.3 Separate consideration will be given as to whether a referral to the TRA be made where a teacher has been dismissed or would have been dismissed had he / she not resigned, because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence.

6 **Malicious allegations**

6.1 Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Principal will consider whether to take disciplinary action in accordance with the College's behaviour and discipline policy.

6.2 Where a parent has made a deliberately invented or malicious allegation the Principal will consider whether to require that parent to withdraw their child or children from the College on the basis that they have treated the College or a member of staff unreasonably.

6.3 Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the College reserves the right to contact the police to determine whether any action might be appropriate.

7 **Record keeping**

7.1 Details of allegations found to be malicious will be removed from personnel records.

7.2 For all other allegations, full details will be recorded on the confidential personnel file of the person accused.

7.3 An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references. In accordance with KCSIE, a history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

7.4 The College will retain all safeguarding records and relevant personnel records for so long as reasonably required and in accordance with the data retention policy[1]

[1] In accordance with the terms of reference of the Goddard Inquiry all Schools are required to retain information which relates to allegations (substantiated or not) of organisations and individuals who may have been involved in, or have knowledge of child sexual abuse or child sexual exploitation; allegations (substantiated or not) of individuals having engaged in sexual activity with, or having a sexual interest in, children; institutional failures to protect children from sexual abuse or other exploitation.

Appendix 5

Recording Form for Safeguarding Concerns

Staff are required to complete this form and pass it to NICK OWENS (DSL), CONSTANTIN LEONTE (DDSL), WYLIE WRIGHT (DDSL), CORY WHITE (DDSL) or LINDA MUGADZAWETA (DDSL) if they have a safeguarding concern about a pupil in the college.

Full name of child	Nationality	Date of Birth	Your name and position in school

Nature of concern/disclosure
Details of concern, please describe the issue fully including dates, names, reported allegations, observations of behaviour, injuries etc (please continue on a separate sheet if necessary)
Who are you passing this information to and for what reason? Name: Position:

Reason:
Your signature: **Time:** **Date:**

Action taken by DSL

(Consider the context: past incidents, SEN, significant life changes etc.

Referred to…?

Attendance

Officer	Police	School Matron	Children's Services
☐	☐	☐	☐

Parents informed? Yes / No (If No, state reason)

Full name:

DSL Signature:

Date:

BROOKE HOUSE COLLEGE

Dealing with a concern raised by or on behalf of pupil(s) or third parties of discrimination, victimisation or harassment.

Risk Assessment **✓/X**

1	Is this a current or non-recent issue? Could others be at risk of harm? Is urgent action required?	
2	Consider if professional support is required and, if so, when (e.g., legal and PR advice) and budget accordingly.	
3	Should insurers be notified at this stage? Should this be kept under review? - For example, claims or circumstances potentially giving rise to civil claims may be mandatorily notifiable. The College may also have cover for external PR support and/or representation in regulatory or criminal proceedings.	
4	PR - establish early a co-ordinated approach to communications (including to correspondence with complainant and others affected), taking precautionary steps as required - eg preparing anticipatory statements to parents, pupils, staff and press.	
5	Consideration should be given at each stage of dealing with the matter to maintaining confidentiality and sharing information on a 'need to know' basis only, to ensure that procedures are not undermined.	

Investigation and Response **✓/X**

1	Establish the appropriate policy/procedure that the College should be following (ie is this the safeguarding policy, anti-bullying policy, parental complaint policy) and whether this should be addressed informally or formally. Where no specific policy or procedure in place, ie where the complainant is a third party, consider who should lead the College's response and if and how the complaint can and will be considered.	

2	Refer internally as required, eg to DSL/Principal/Safeguarding Director	
3	Consider external reporting - eg to LADO, Local Authority, police, if allegation made against staff member or there are concerns about a current pupil.	
4	Consider whether any support needs to be put in place for affected individuals - counselling lines, nominated pastoral support.	
5	Consider scope and nature of any College investigation, methodology and whether/how the output should be reported, with regard to: •viability of any investigation; (e.g., historic allegations may be more difficult to investigate) •timing. •permission to do so from regulatory authorities. •specific policy requirements; (e.g., complaints policy stages, timetable and personnel) •scope - this issue or wider consideration of policy or procedure, values and culture? •investigator - internal or external? To investigate only or decide the issue too? •report - Anonymised? Shared?	
6	Identify roles and responsibilities with a view to ensuring that all roles in investigatory and subsequent procedures can be fulfilled by suitable individuals.	
7	Appoint an investigating officer. Provide written terms of reference to ensure clarity about the scope and aim of the investigation, timescales and who may have access to it.	
8	Consider ongoing correspondence with the complainant and others affected concerning the process that is to be followed, likely timescales, manage expectations as required concerning possible outcomes.	
9	Consider further policy requirements or procedures arising from investigation findings, e.g., staff or pupil disciplinary.	

10	Consideration should be given to remedial action (e.g., training, changes to policies and procedures) and ongoing monitoring oversight of any identified issues (e.g. through Directors' sub committees, SMT or Faculty level).	

Appendix 7

BROOKE HOUSE COLLEGE

Checklist -for use when DSL is considering whether or not an allegation of child-on-child abuse should be reported to the police against a victim's wishes

Points which need to be considered: -

•Where a report of rape, assault by penetration or sexual assault* is made, this should be referred to the police; and

•The College should consider the wishes of the victim in terms of how they want to proceed, and victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and about support that they will be offered. The College is required to balance the victim's wishes against their duty to protect the victim and other children. Decisions should be made on a case-by-case basis with the DSL taking a leading role. This checklist is designed to assist that process for completion after discussion with pupils and not as a list of questions to be asked of them. As is usual with safeguarding matters, staff should, as far as possible, adhere to the following basic principles:

•Listen to the victim.

•Reassure them that they are being taken seriously, will be supported and will be kept safe.

•Do not promise confidentiality.

•Do not stop them if they are freely recalling significant events.

•Where necessary to ask questions, they should be open-ended and limited to those needed to take immediate action.

•Make a comprehensive note of the discussion afterwards, recording the timing, setting, people present and demeanour, as well as factually recording what was said.

* 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.

	Factual detail	**Comments**
The Offence		
Nature and circumstances of the offence & who was involved?		
Is the alleged perpetrator a pupil at the school? In the same year group/class?		
Does the allegation involve one of rape, assault by penetration or sexual assault? Is it serious? e.g. was physical violence used? Degree?		
Is there any evidence which needs to be preserved?		
Is it a one-off allegation [if so, when?] or a series? [if so, when and is it ongoing?]		
Where did the incident take place? [& was the school responsible for the pupil at the relevant time?]		
Were alcohol or drugs involved?		
Was the incident or its aftermath witnessed by anyone?		
Is there an online element? e.g. have images been taken and shared?		
The victim		
Age of victim [now and at the time of the incident or start of the abuse]?		

Do they have any protected characteristics? And what are their health, capacity, confidence & SEND/language skills to make an informed decision on these issues		
Parental reaction [if parents have been informed]? Their home residence, social, racial, cultural & religious background?		
Any suggestion of intimidation of the victim or witnesses?		
Do you consider the victim or alleged perpetrator (a) to be at immediate risk of danger or are likely to suffer harm or (b) have suffered harm? [if so, a referral should be made to First Response Team of LRSCP]		
What does the victim want? If they do not want it referred to the police, what reasons have they given for that? Have the implications of this been explained?		
What was their demeanour? And your assessment of the likely impact of this being progressed against their wishes?		
The report		
When was it first reported, by who and to whom?		
Who else knows? [e.g. is it widely discussed among the pupil's cohort/on social media? is the		

member of staff who has been told, the only person supporting the pupil at this stage?]		
Consultation/advice		
Has this matter been discussed with the pupil's parent(s) or guardian/educational agent?		
Have you taken advice from external agencies such as the police, CSC, local safeguarding partnership, NSPCC?		
Have you discussed this with other key stakeholders within the pupil's pastoral network e.g. Principal/Director of Boarding?		
Have you referred the victim to other avenues of support which may be available about their decision e.g. NSPCC helpline for professionals 0808 800 5000 or Sexual Abuse helpline 0800136663 help@nspcc.org.uk? Childline 0800 1111 Made arrangements to support all those involved?		

Appendix 8

Low-level Concerns annex to child protection and safeguarding policy

1.0 Purpose

1.1 This policy sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school. Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the "Guidance for safer working practice for those working with children and young people in education settings" (May 2019) (sometimes called the safeguarding code of conduct) are lived, monitored, and reinforced.

1.2 The policy should be read in conjunction with the current statutory guidance – "Keeping Children Safe in Education" Part 4, Section 2.

2.0 Who does the policy apply to?

2.1 This policy applies to all staff and other individuals who work or volunteer in school.

3.0 Definition of a low-level concern

3.1 A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with the "Guidance for safer working practice" (May 2019), including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO

4.0 Reporting low-level concerns.

4.1 Where a low-level concern has been identified this will be reported as soon as possible to the **Principal**. However, it is never too late to share a low-level concern if this has not already happened.

4.2 Where the Principal is not available, the information will be reported to the Designated Safeguarding Lead or Vice Principal.

4.3 Low-level concerns about the Designated Safeguarding Lead will be reported to the Principal and those about the Principal will be reported to the designated safeguarding Director, Mrs Joan Williams.

4.4 Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the Principal of the details as soon as possible.

5.0 Recording concerns

5.1 A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward.

5.2 Where concerns are reported verbally to the Principal a record of the conversation will be made by the Principal which will be signed, timed, and dated.

6.0 Responding to low-level concerns.

6.1 Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Principal will:

- Speak to the person reporting the concern to gather all the relevant information.
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or Police (HR advice may also need to be taken).
- Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses.
- The information reported and gathered will then be reviewed to determine whether the behaviour,

  i) is consistent with the "Guidance for safer working practice for those working with children and young people in education settings" (May 2019): no further action will be required,

  ii) constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. either via the Performance Management Policy or Disciplinary Policy.

  iii) is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and advice taken from HR. In this case the school's Managing Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed.

  iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and advice taken from HR. In this case the school's Managing Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed.

- Records will be made of, i) all internal conversations including any relevant witnesses, ii) all external conversations eg with the LADO iii) the decision and the rationale for it, iv) any action taken

7.0 Can the reporting person remain anonymous?

7.1 The person bringing forward the concern will be named in the written record. Where they request to remain, anonymous this will be respected as far as possible. However, there may be circumstances where this is not possible e.g., where a fair disciplinary investigation is needed or where a later criminal investigation is required.

8.0 Should staff report concerns about themselves (i.e., self-report)?

8.1 It may be the case that a person finds themselves in a situation which could be misinterpreted or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard expected. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

9.0 Where behaviour is consistent with the "Guidance for safer working practice" (May 2019)

9.1 Feedback will be given to both parties to explain why the behaviour was consistent with the "Guidance for safer working practice".

10.0 Should the low-level concerns file be reviewed?

10.1 The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained.

11.0 References

11.1 Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

12.0 What is the role of the Directors?

12.1 The Principal will regularly inform the Directors about the implementation of the low-level concerns procedures, as laid out in this annex, including any evidence of its effectiveness eg with relevant data. The Safeguarding Director may also review an anonymised sample to ensure that these concerns have been handled appropriately.