



<b>SAFEGUARDING &amp; PREVENT POLICY</b>
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Strategy/Policy Responsibility: <i>Vice Principal, Education &amp; Quality</i>
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Safeguarding is Everybody's Responsibility

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## Key contacts

### **Executive lead:**

Name: Martin Silverwood (Vice Principal Education & Quality)  
Contact details: 020 8760 3131

### **Designated safeguarding lead:**

Name: Vicky Chainey (Director of Student Support Services)  
Contact details: 07891560504

### **Deputy designated safeguarding lead:**

Name: Ryan Manning (Head of Safeguarding & Wellbeing)  
Contact details: TBC

### **Designated CLA teacher:**

Name: Ryan Manning (Head of Safeguarding & Wellbeing)  
Contact details: TBC

### **Nominated governor for safeguarding:**

Name: Jean Cooke  
Contact details: via DSL/Clerk to the Governors

## ***London Borough of Croydon***

### **Local Authority Designated Officer (LADO):**

lado@croydon.gov.uk

Senior LADO: Steve Hall  
Email: [steve.hall@croydon.gov.uk](mailto:steve.hall@croydon.gov.uk)  
Tel: 0208 255 2889 Mob: 07825 830328

LADO: Jane Parr  
Email: [jane.parr@croydon.gov.uk](mailto:jane.parr@croydon.gov.uk)  
Tel: 0208 726 6000 (Ext. 84343) Mob: 07985 590505

### **SPOC (Single Point of Contact):**

For urgent child protection matters requiring immediate attention: Tel: 0208 255 2888

SPOC Professionals Consultation Line, Tel: 0208 726 6464

Email SPOC referrals to: [childreferrals@croydon.gov.uk](mailto:childreferrals@croydon.gov.uk)

Manager: Jonathan Lung (Service Leader, Children & Families))  
Email: [Jonathan.Lung@croydon.gov.uk](mailto:Jonathan.Lung@croydon.gov.uk)

### **Croydon Safeguarding Children Partnership (CSCP)**

Website: [https://croydonlcsb.org.uk/Safeguarding learning & development](https://croydonlcsb.org.uk/Safeguarding%20learning%20&%20development)

Email: [CSCP@croydon.gov.uk](mailto:CSCP@croydon.gov.uk)

Tel: 0208 604 7275

## Core operational policies and procedures

### Purpose and Aims of this policy

This is statutory guidance from the Department for Education ('the Department') issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015, and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended) . Schools and colleges in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance children includes everyone under the age of 18. (KCSIE 2022). KCSIE now applies to providers of post 16 education as set out in the Education and Training (Welfare of Children) Act 2021

It is essential that **everybody** working in the College understands their safeguarding responsibilities. 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.

### Aims

- Ensure safe recruitment practice in checking the suitability of all staff and volunteers to work with children including the completion of risk assessments.
- Ensure staff are appropriately trained.
- Raise awareness of safeguarding/child protection issues amongst all staff and volunteers and of what to do if they have concerns.
- Ensure that volunteers are appropriately supervised.
- Ensure that procedures and expectations for identifying and reporting/recording cases, or suspected cases, of abuse to relevant agencies are robust.
- Ensure that links with relevant agencies are effective including working in partnership regarding child protection matters, including attendance at case conferences and core group meetings.
- Ensure the College environment is safe and is one in which pupils feel secure and are encouraged to talk freely about anything that concerns them.
- Ensure pupils know there are adults in the College who they can approach if they are worried about anything.
- Ensure the curriculum and other provision, including opportunities in the Health and Wellbeing/PSHE curriculum, develop and equip pupils with the skills needed to feel safe and adopt safe practices
- Support for pupils who have been abused or may be at risk of harm in accordance with any agreed child protection plan.
- Ensure we respond appropriately to any concern or allegation about a member of staff or volunteer.
- Ensure staff follow accepted "safe practice" principles when working with pupils.
- Ensure pupils are protected from all forms of harm.

### Induction and training

- The Principal will ensure that all staff are fully inducted, are made aware of the following policies of the College and that staff are fully aware of their role in implementing these:
  - Safeguarding and child protection policy and procedures (including information themes such as Child-on-Child abuse, contextual safeguarding, and Online Safety)
  - Behaviour policy (including measures to prevent bullying including cyberbullying, prejudiced based and discriminatory bullying.)
  - Staff code of conduct including low-level concerns, allegations against staff and whistleblowing.
  - Safeguarding response to children missing from education.
  - Role of the designated safeguarding lead and deputies
- Staff, including those not directly working with children, will be asked to confirm in writing that they have received, read, and understood all relevant staff policies, including “*What to do if you are worried a child is being abused*” guidance and ‘*Keeping Children Safe in Education 2022 part 1*’
- The designated safeguarding lead will ensure that all staff are fully inducted with regard to the College child protection procedures and that they receive safeguarding and child protection training on two yearly basis as a minimum. This will include online safety.
- The Principal will keep a central record of all statutory and other training undertaken by staff members, governors and volunteers.
- College staff and governors will receive multi-agency safeguarding training at the level that is appropriate to their roles and responsibilities.
- As well as basic safeguarding training, the designated safeguarding lead and their deputy will receive specific training on their role on their role and other relevant multi-agency training courses.
- College staff will also receive training on Early Help and the SPOC/MASH safeguarding referral process as part of their safeguarding training. They will understand what the services are for and how to access support through them.
- College staff will receive regular and timely updates on child protection and safeguarding issues via the designated safeguarding lead in order to ensure they remain up to date with new legislation (for example, via email, e-bulletins, and staff meetings).
- **All** staff should know what to do if a child tells them they are being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.
- **All** staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. They should never be made to feel they are a problem or feel ashamed.
- **All staff** should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

## Safeguarding children

The College recognises the additional vulnerabilities of younger students, particularly those aged 14-16. Staff are made aware of their responsibility to act immediately and appropriately if a disclosure is made or a risk of harm is suspected.

### **Safeguarding: is about every child**

In relation to children and young people, safeguarding and promoting their welfare is defined in 'Working together to safeguard children' as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

### **Early help cases**

Staff will identify children who need extra help at an early stage and provide help and support in order to prevent concerns from escalating. In particular, staff will be aware of the needs of the following groups of children whose circumstances may mean they will require early help:

- children with disabilities and additional needs, including those with special educational needs
  - young carers
  - if the child has a mental health need.
  - children showing early signs of being drawn into anti-social or criminal behaviour, including gangs and organised crime.
  - children who frequently go missing from home, school or care.
  - children who are misusing drugs or alcohol.
  - children at risk of exploitation through modern slavery and trafficking.
  - Children at risk of being radicalised or exploited.
  - A family member in prison or is affected by parental offending.
  - children whose home circumstances are negatively affected by adult substance misuse or mental ill health or domestic abuse.
  - Misusing drugs or alcohol themselves.
  - children who have returned home from care.
  - children who show early signs of abuse or neglect, including where there are concerns about the cumulative effect of low level neglect.
  - is at risk of honour-based abuse such as Female Genital Mutilation or forced marriage.
  - is persistently absent from education.
  - privately fostered children.
- Where the child's extra needs require services, consideration will be given to what early help support can be offered to a child by the College.
  - If the child requires an early help service from another agency, the College will make a referral to the Single Point of Contact (SPOC) for appropriate help and support. Staff will consult with parents prior to making any referral to discuss the matter and **gain consent** to refer the child.
  - Where the child is receiving an Early Help service, the College will work as part of the Team Around the Child/Family (TAC/F) and take up the role of lead professional where this is appropriate.

- Early help provision should be monitored and reviewed to ensure outcomes for the child are improving. If the College believes that this is not the case, consideration should be given making a referral for a statutory social work service.

**Child Protection: is those at risk of significant harm**

The College will carry out its duty to safeguard pupils which is:

- protecting children from maltreatment
- preventing impairment of children’s health or development
- ensuring children are growing up in circumstances consistent with the provision of safe and effective care
- undertaking that role so as to enable children to have optimum life chances so they can enter adulthood successfully.

***For a list of definitions and indicators of abuse and neglect, see appendix 1.***

Action may be needed to protect children and learners from specific safeguarding issues such as:

- Abuse: Neglect, physical, sexual and emotional
- Disguised compliance
- Children missing in Education (CME)
- Children who are home schooled ('Hidden Children')
- Radicalisation / extremism
- So-called 'Honour Based' Abuse (HBA)
- Breast Ironing
- Mental health concerns including self-harm
- Bullying including on-line (cyber) bullying and prejudice-based bullying
- Racism, disability, homophobic or transphobic abuse
- Gender based violence/violence against women and girls
- Domestic Abuse
- Poor parenting
- Child sexual exploitation and trafficking (CSE)
- The impact of new technologies on sexual behaviour
- Substance misuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Fabricated or induced illness
- Faith abuse
- Gangs and youth violence (including Child Criminal Exploitation: County Lines)
- Private fostering
- Sexting (Youth Produced Sexual Imagery)
- Child-on-child abuse
- Teenage relationship abuse
- Serious Violent Crime
- Sexual violence
- Sexual harassment
- Children with family members in prison
- Children and the court system
- Homelessness
- Adverse Childhood Experiences (ACEs)
- Trauma and Attachment issues
- Up-skirting
- Knife Crime



- County Lines
- Modern Slavery
- Cybercrime

The College will seek advice from the SPOC Professionals' Consultation Line to help make decisions on the child's level of need and the appropriate service to refer on for services. Staff will consult with the designated safeguarding lead for advice and to discuss the case prior to making any referral for services.

The SPOC Professionals' Consultation Number is 0208 726 6464

All referrals for a children's social care service will be made by way of Single Point of Contact (SPOC) Safeguarding Referral Form. SPOC is Croydon's "front door" for children's social care referrals and accepts referrals for all cases.

### [SPOC Referral Form](#)

Parental consent for referral will be sought unless advised not to by a member of the SPOC team, specifically linking to allegations of sexual abuse, concerns of fabricated or induced illness or the parent is the alleged perpetrator, but a referral will be made regardless of consent being given in cases where the child is at risk of significant harm.

Staff will also share information and work in an integrated way to ensure a co-ordinated response from agencies to support families and meet the child's needs.

The Online tool [Report a child to your local council](#) directs you to the local children's social care contact number.

### **Referral for a statutory social work service**

Where there are concerns about a child's welfare, staff will act immediately by seeking the advice of the designated safeguarding lead or their deputy are most likely to have the most complete safeguarding overview. Following consultation, the designated safeguarding lead should decide on whether to make a referral to children's social care via SPOC. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that the College provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional information is available here: [Contextual Safeguarding](#).

Where the referral raises concerns that the child is at risk of significant harm, the case will be passed on to Croydon's MASH team to gather relevant information from other agencies.

SPOC will inform the College of the outcome of any referral and what action children's social care will be taking. This may include any of the following:

- Carrying out a child and family assessment to identify the child's needs and establish if the child is a **child in need** under section 17 of the Children Act 1989. These are children (including disabled children) who are unlikely to meet a reasonable standard of health and development unless provided with services.
- Convening a **strategy meeting/discussion under child protection** procedures as set out in section 4 for any child where there are concerns about significant harm and/or taking any immediate action in order to protect the child.

- Providing interim services for the child and their family in the meantime whilst work is on-going (including details of appropriate services).

### **Children who need a Social Worker**

Children may have a social worker due to neglect, abuse or difficult family circumstances. Their experience can leave them vulnerable to further harm and we have a duty as professionals to help protect them. The local authority should communicate with the designated lead so they know if a child has a social worker and therefore enable them to make decisions which are in the best interest of the child's safety, welfare and educational outcomes.

Further documents which may assist in supporting these families can be found in [Review of children in need. Help, Protection, Education](#) concludes the review.

### **Child protection procedures**

#### **Role of the College**

The College will work to the following policy documents in order to support the protection of pupils who are at risk of significant harm.

Working together to safeguard children (DfE 2018)

- [Working together to safeguard children](#)

What to do if you're worried a child is being abused (DfE2015)

- [What to do if you're worried a child is being abused - Publications - GOV.UK](#)

The London Safeguarding Children Board child protection procedures

- [London Safeguarding Children Board: Child Protection Procedures](#)

Keeping children safe in education (DFE 2022)

- [Keeping Children Safe in Education](#)

Croydon Safeguarding Board local policies and procedures

- [CSCB local policies and procedures](#)

London Child Protection Procedures 2022

- [London Procedures](#)

*Other document links can be found within their relevant sections of this policy.*

In line with these policies and procedures, the College will:

- identify those pupils where there are child protection concerns and make a referral to SPOC
- attend child protection case conferences in order to effectively share information about risk and harm
- contribute to the development and monitoring of child protection plans as a member of the core group
- carry out the College's role in implementing the child protection plan and continually monitoring the child's wellbeing, and liaising with the allocated social worker as required.

### **Recognition**

- Staff have a responsibility to identify those children who are suffering from abuse or neglect and to ensure that any concerns about the welfare of a pupil are reported to the designated safeguarding lead.
- **Staff should refer to Annex 3 for abuse indicators** that may suggest a pupil may be at risk of suffering significant harm.
- Any concerns held by staff should be discussed in the first instance with the designated safeguarding lead or their deputy and advice sought on what action should be taken. Where required, advice can be obtained from the SPOC Professionals Consultation Line on a no-names basis.
- Concerns may be monitored over time and should be recorded on a monitoring/incident form shown such as the example in appendix 2 **or** logged within an electronic system. Details of any concerning incidents should also be recorded on this form.
- All staff should know what to do if a child tells them he/she is being abused, exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality.
- All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- **All** staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face.

## Records

- Safeguarding monitoring records and Child protection records relating to pupils are highly confidential and will be kept in a designated welfare file separate to the pupil's education records. These records will be securely held within the College.
- The designated safeguarding lead is responsible for ensuring that records are accurate, up to date and that recording is of a high standard.
- All information should be recorded on CPOMs and all records should be signed and dated.
- Records should show:
  - what the concerns were.
  - whether information of the concern was shared with the parent and what their response was.
  - what action was taken to refer on concerns or manage risk within the College.
  - whether any follow-up action was taken.
  - how and why decisions were made.
  - Outcomes
- Any incidents, disclosures or signs of neglect or abuse should be fully recorded with dates, times and locations. Records should also include a note of what action was taken and outcomes.
- CPOMs must be updated:

- whenever concerns arise or there is a serious incident **or**
  - where a child is being monitored, prior to a case conference or core group meeting.
- When a child transitions to the College, the master file is passed to the designated safeguarding lead, transferred securely and confirmation of receipt obtained. This may assist the College in planning appropriate support for the child and the family.
  - A copy of child protection & safeguarding file should be retained in line with the College's information retention schedule. Child protection & safeguarding records must be disposed of as confidential waste.

### **Dealing with disclosures**

If a pupil discloses to a member of staff that they are being abused, the member of staff should.

- listen to what is said without displaying shock or disbelief and accept what the child is saying.
- allow the child to talk freely.
- reassure the child but not make promises that it may not be possible to keep, or promise confidentiality, as a referral may have to be made to children's social care.
- reassure the child that what has happened is not their fault and that they were right to tell someone.
- not ask direct questions but allow the child to tell their story.
- not criticise the alleged perpetrator.
- explain what will happen next and who has to be told.
- make a formal record and pass this on to the designated safeguarding lead.

### **DO NOT DELAY**

- Tell the Designated Safeguarding Lead as soon as you can – it may be necessary to interrupt a lesson to do this. Staff should not rely on leaving notes or emails for urgent concerns, that may not be immediately seen or actioned.
- Early referral gives more time to offer help to the pupil and family before the situation becomes more serious.
- When the matter is already severe or serious, early referral gives more time for others to protect the pupil.
- The Designated Safeguarding Lead may consult the SPOC.

### **MAKE WRITTEN NOTES**

- At the earliest opportunity make a written record of your concerns, should be logged as a confidential referral on MyPT for staff with access, or a paper statement passed directly to the DSL for staff without access - record facts accurately and do not express opinion - these notes will help to ensure accuracy in recalling events later - notes should be legible, signed and dated/time.
- Do not take photographs of any physical injuries, record on a body map. Do not use audio to record disclosures.
- Any original notes must be given to the Designated Safeguarding Lead as soon as possible and kept, even if you are using an online reporting system.

### **Referral**

- Where possible, a decision on whether or not to refer a pupil to SPOC should be made by the designated safeguarding lead or their deputy following a discussion with the member of staff who has raised concerns. However, this should not delay any referral and *any* member of staff may make a referral if this is necessary but staff should discuss the matter with a member of the senior

management team and take advice from the SPOC team social worker. The designated safeguarding lead should be informed as soon as possible.

- Referrals should be in writing using an SPOC safeguarding referral form completed either by the teacher raising concerns or by the designated safeguarding lead. Urgent child protection referrals will be accepted by telephone but must be confirmed in writing via the SPOC safeguarding referral form within 48 hours.
- Where there is any doubt about whether the concerns raised meet the thresholds for a child protection referral, the designated safeguarding lead may discuss the case on a “no names” basis with the SPOC Professionals’ Consultation Line to obtain advice on how to proceed.
- Parental consent must be sought prior to the referral being made unless to seek consent would place the child at risk of further harm, interfere with a criminal investigation or cause undue delay. If parents do not consent, but the child is at risk of significant harm, the referral should still be made.
- If the child already has an allocated social worker, the referral should be made directly to them. If the child is not already known to children’s social care, referrals should be made to SPOC. If the child lives outside Croydon, a referral should be made to their home local authority.
- All referrals will be acknowledged by the SPOC and the referrer informed of what action will be taken.
- If the College does not think the child’s situation is improving within a reasonable timescale following referral, this should be taken up with children’s social care via the designated safeguarding lead.

#### **Attendance at Case Conferences, Core Groups and Child in Need Meetings**

- The designated safeguarding lead will liaise with children’s social care to ensure that all relevant information held by the College is provided to children’s social care during the course of any child protection investigation.
- The designated safeguarding lead will ensure that the College is represented at child protection case conferences and core group meetings:
  - where possible, a member of staff who knows the child best, such as a class teacher or head of year will be nominated to attend
  - failing that, the designated safeguarding lead or their deputy will attend
  - if no-one from the College can attend, the designated safeguarding lead will ensure that a report is made available to the conference or meeting.

#### **Monitoring**

Where a pupil is the subject of a child protection plan, and the College has been asked to monitor their attendance and welfare as part of this plan.

- monitoring will be carried out by the relevant staff member in conjunction with the designated safeguarding lead.

- all information will be recorded on the child protection monitoring/incident form shown at appendix 2 or similar, prior to each conference and core group meeting.
- the completed monitoring form will be kept on the pupil's separate child protection file (that should be separate from their college record) and copies made available to all conferences and core group meetings.
- the designated safeguarding lead will notify the allocated social worker if the child is removed from the College roll, excluded for any period of time or goes missing.

## Confidentiality and Information Sharing

**KCSIE 2022 tells us that**

***The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.***

Further information on information sharing can be found:

- **Chapter 1 – [Working Together to safeguarding children](#)**
  - **[Information Sharing: Advice for Practitioners](#)**
  - **[Information Commissioner's Office](#)**
  - **[Data Protection Toolkit for Schools](#)**
- All information obtained by College staff about a pupil will be kept confidential and will only be shared with other professionals and agencies with the family's consent.
  - Young people aged 16 and 17 are able to give their own consent for information sharing if they are thought to have the capacity to do so under the Mental Capacity Act. Otherwise consent should be sought from parents.
  - Where a child is at risk of suffering significant harm, the College has a legal duty to share this information with children's social care and make appropriate referrals. Equally, where a child is subject to a child protection investigation, the College shares any information about the child requested by children's social care.
  - Parental consent to making a child protection referral should be sought but if withheld, the referral must still be made, and parents made aware of this. Before taking this step, the College should consider the proportionality of disclosure against non-disclosure. Is the duty of confidentiality overridden by the need to safeguard the child?
  - Parental consent to referral can be dispensed with if seeking consent is likely to cause further harm to the child, interfere with a criminal investigation or cause undue delay in taking action to protect the child. However, the College discusses this with the SPOC Professionals Consultation Line on a "no names" basis to gain advice on whether this course of action should be taken.
  - Only relevant information should be disclosed, and only to those professionals who need to know. Staff should consider the purpose of the disclosure and remind recipients that the information is confidential and only to be used for the stated purpose.

- In the event that a child makes a disclosure of neglect or abuse, staff cannot guarantee them confidentiality, but must explain why they have to pass the information on, to whom and what will happen as a result. Parents should also be made aware of the College's duty to share information.
- Staff should discuss any concerns or difficulties around confidentiality or information sharing with the designated safeguarding lead or seek advice from the SPOC Professionals Consultation Line.

## **Working with Parents and Carers**

The College recognises the importance of working in partnership with parents and carers to ensure the welfare and safety of pupils.

The College will:

- make parents aware of the College's statutory role in safeguarding and promoting the welfare of pupils, including the duty to refer pupils on where necessary, by having a safeguarding statement on the home page of their website and making all college policies available on the college website or on request.
- provide opportunities for parents and carers to discuss any problems with teachers and other relevant staff.
- ensure a robust complaints system is in place to deal with issues raised by parents and carers.
- provide advice and signpost parents and carers to other services and resources where pupils need extra support.

## **Multi-agency Working**

- The College will work in partnership with relevant agencies in order to meet its obligations under section 11 of the Children Act 2004 and *Working together to safeguard children* 2018.
- The College recognises its vital role in safeguarding school-age children and will co-operate with the Croydon Safeguarding Children Board to ensure joint working with partner agencies in order to improve outcomes for children in Croydon.

## **Safeguarding Issues**

**The Law – KCSIE 2022 Page 24 sets out legal requirements around safeguarding. These include**

[The Human Rights Act 1998](#)

[Equality Act 2010](#)

[Equality and Human Rights Commission](#)

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

Child-on-child abuse is where a pupil's behaviour is likely to cause significant harm to other pupils.

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

- bullying (including cyberbullying).

- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- sexual violence and sexual harassment.
- gender-based violence.
- sexting (also known as youth produced sexual imagery).
- initiation/hazing type violence and rituals.
- upskirting (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. It is now a criminal offence and may constitute sexual harassment. (Voyeurism (Offences) Act 2019)

This type of abuse should never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with child-on-child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence. The College will refer the perpetrator and the victim to children's social care via SPOC

### **Child on child sexual behaviour, sexual violence and harassment**

The College responds to **all** reports and concerns of child on child sexual violence and sexual harassment, including those that have happened outside of college premises or online (what to look out for, and indicators of abuse are set out in Part one KCSIE 2022).

Sexual violence and sexual harassment can occur between two children of any age and sex from primary through to college age. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. All staff working with children are advised to maintain an attitude of **‘it could happen here’ and know we have ZERO-Tolerance to child-on-child harassment, abuse and violence.**

Sexual violence and sexual harassment can occur online and offline (both physical and verbal) and are never acceptable.

### **Sexual Violence**

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003. Rape, assault by penetration, sexual assaults and causing someone to engage in sexual activity without their consent are crimes. (*Definitions of categories can be found on page 104 KCSIE 2022*). Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to MASH. Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. Where an alleged incident took place away from the College or online, the duty to safeguard pupils remains the same.

The designated safeguarding lead (or deputy) should ensure they are engaging with children's social care and specialist services as required.

### **Consent**

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

### **The following situations are statutorily clear and do not allow for contrary decisions:**

- A child under the age of 13 can never consent to sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.
- Rape, assault by penetration and sexual assault are defined in law.
- Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.



Further information on consent can be found [HERE](#).

### **Sexual Harassment**

KCSIE 2022 tells us that *when referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of the college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.*

Examples include:

- sexual comments
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes.
- displaying pictures, photos or drawings of a sexual nature
- upskirting and
- online sexual harassment. Further examples can be found on page 106 KCSIE 2022.

### **Harmful Sexual Behaviour**

This is where sexual behaviour ranges from developmentally 'normal' to inappropriate, problematic, abusive and violent. Harmful Sexual Behaviour HSB is widely used as an overarching term and can happen online or face-to-face. When considering HSB, both ages and the stages of development of the children are critical factors. Full details can be found in KCSIE 2022 Page 107

### **Policy**

- The College recognises that sexual violence and sexual harassment between pupils is a serious safeguarding issue and such behaviour will not be tolerated. The behaviour management policies reflect the College's approach and staff and pupils will be made aware of the standard of expected behaviour and the likely responses to any incidents of sexual violence and harassment.
- The College will follow the statutory guidance *Sexual violence and sexual harassment between pupils* and will work with relevant agencies to safeguard and support victims, take appropriate action against alleged perpetrators and ensure a safe learning environment for all pupils. [Sexual violence and sexual harassment between children in schools and colleges](#)
- The College will take all necessary steps to put in place a planned tutorial curriculum to convey the the College's policy for preventing harmful sexual behaviour and to promote respectful behaviour between pupils with regards to sexual conduct.
- The College will promote an environment where victims feel empowered to raise concerns and report incidents. Any reports of sexual violence or harassment will be taken seriously and thoroughly investigated by the College and appropriate referrals made to the police and children's social care.
- The College will ensure that staff and governors receive relevant training to help them ensure an effective response to incidents that protects individual victims and safeguards the welfare of all pupils and staff.
- It should be noted that **ALL** reports of sexual harassment and violence should be taken seriously, but staff need to be aware it is more likely that girls will be the victims of sexual violence and sexual

harassment and more likely it will be perpetrated by boys. Children with additional needs are three times more likely to be abused.

- The College will ensure staff are able to provide appropriate support to victims and alleged perpetrators that meets their needs and continues to promote their education.

## Procedures

- Not all children will directly tell a member of staff about their experience and staff need to know how to respond when overhearing a conversation or if they notice a change in the child's behaviour. Children who are victims of sexual violence and sexual harassment may find the experience stressful and distressing.
- The College will ensure there is a robust response to all incidents and will follow the procedures set out in Part 5 of the *Keeping children safe in education* statutory guidance.
- Reported incidents will be investigated by the member of staff to whom the young person discloses in partnership with the designated safeguarding lead, who will also carry out a risk assessment to look at any continued risk to the victim or other pupils and staff from the alleged perpetrator within the College environment. Toolkits that will support the risk assessment process include: [Brook: traffic light tool](#).
- Where the allegation involves material posted online, the College will request that the electronic device is handed over as part of the investigation and will use legal powers to search and confiscate property as set out in the statutory guidance [Searching, screening and confiscation guidance](#) and [UKCIS Sexting in schools and colleges advice](#).
- The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable and informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.
- When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider: the victim, especially their protection and support, the alleged perpetrator(s) and all the other children (and, if appropriate, adult students and staff) at the College, especially any actions that are appropriate to protect them.
- The member of staff and designated safeguarding lead will write up a record of the investigation that will set out how the College will respond to the incident.
- The designated safeguarding lead may take advice from SPOC Professionals' Consultation Line before making a decision. Possible outcomes include referral to Early Help Services, MASH, Learning Access and/or the police, or managing the matter internally under the College behaviour policies.
- Where a referral will be made to children social care or the police, the designated safeguarding lead will discuss the issue with the relevant agency and following this discussion a decision will be made on whether and how to inform the alleged perpetrator and their parents.
- KCSIE states that the College should carefully consider any report of sexual violence and/or sexual harassment. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response. Important considerations will include: the wishes of the victim in terms of how they want to proceed. This will

however need to be balanced with the College's duty and responsibilities to protect other children. the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour. the ages of the children involved. the developmental stages of the children involved. any power imbalance between the children. if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature). that sexual violence and sexual harassment can take place within intimate personal relationships between peers. are there ongoing risks to the victim, other children, adult students or staff.

- The College will take any necessary action to continue to safeguard the victim and other pupils within the College environment based on the level of risk established from the risk assessment, including decisions about the victim and alleged perpetrator sharing classrooms. These decisions will be reviewed in the light of on-going police and children's social care investigations to take account of any changes in the status of investigations and any bail conditions placed on the alleged perpetrator.
- Where necessary and appropriate, the College will consider the support needs of the alleged perpetrator and will make referrals to relevant agencies for support on their behalf.
- Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support. It is likely that children will "take sides" following a report and the College will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment. The College will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.
- [The National Organisation for the Treatment of Abusers \(NOTA\)](#) provides support for professionals involved in work with, or related to, sexual offending.
- The College will consult with **Part 5 KCSIE 2022** (*specifically pages 110-115*) when managing allegations of child-on-child sexual harassment or sexual violence. The College will consider the 4 likely scenarios when managing reports of incidents
  - Manage internally
  - Early Help
  - Referral to Children's social Care
  - Report to Police
- Risk assessing (479), safeguarding and supporting victims (530), Safeguarding and supporting the alleged perpetrator (540), disciplining alleged perpetrators (543) and safeguarding other children (552), can all be advised through the relevant paragraphs in KCSIE 2022.
- The College will refer to paragraphs 527-529 with regards to unsubstantiated, unfounded, false or malicious reports and fully follow the recommendations/guidance of recording information and what to do when the report is found to be unsubstantiated, unfounded, false or malicious.

### **What to do if you are informed that a parent is on the sex offenders register**

In this situation the head teacher/principal will be guided by parole conditions where relevant to keep children safe in the College. This information must be treated as strictly confidential and will only be shared with the Designated Safeguarding Lead if appropriate.

## **Additional procedures**

*Sexual violence is defined as any act which is an offence under the Sexual Offences Act 2003, including rape, assault by penetration or sexual assault without the consent of the victim.*

*Sexual harassment is defined as unwanted sexual conduct likely to violate the victim's dignity and/or make them feel intimidated, degraded or humiliated or create a hostile, offensive or sexualised environment. This includes making sexual comments or jokes, physical contact such as touching or interfering with clothing or displaying sexual images. It also includes online harassment.*

*When dealing with incidents, the College should ensure that the written report of the incident contains objective facts and sets out clearly the next steps to be taken, with the views of the victim clearly recorded.*

*The College is aware of their equality duty as victims of sexual violence and harassment are more likely to be female but should follow the same procedures and ensure the same level of response for incidents involving male pupils or incidents where victim and perpetrator are the same sex.*

*Cases may be managed internally without referral to other agencies where the incident involves low-level concerns and is a "one-off" occurrence where there is no further risk to the victim or other pupils*

*Careful thought is given to the day to day management of risk and support for the victim, taking into account the victim's views when considering practical issues such as separating the victim and perpetrator. However the College must be able to justify any measures taken and that they do not interfere with the educational opportunities of either party.*

*The College will ensure that staff and governors are able to take up training and support around relationships and child-on-child abuse and how these messages should be delivered within the curriculum, with designated safeguarding leads receiving more intense training in view of their role.*

## **Contextual safeguarding for young people**

The College is aware that as young people grow more independent, they may face more risk from safeguarding threats from outside of the home, either from within the community, or from their own peer group. Protecting children from these external risks is known as contextual safeguarding. The College therefore reflects the needs of young people in our own communities.

The College acts as a protective factor in children's lives. Children who do not attend can become *hidden*, which means that the College is less able to help and protect them. Children who do not attend education may be at further risk of not achieving their educational potential.

### **Children who run away/go missing**

Children who run away or go missing from home or care are vulnerable to criminal and/or sexual exploitation. If the College becomes aware of a child who is missing from home or care and that child has not been reported missing to the police they should so using 101.

Running away may be an indicator of other problems and therefore referral to SPOC should be considered. Early intervention after the first episode may prevent a child being exploited.

[Children who run away or go missing from home or care](#)

### **Child criminal exploitation – county lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, markets and seaside towns. Those involved with county lines will often go missing for a few days at a time. Children and young people involved in county lines may be considered as having been trafficked and be victims of criminal exploitation.

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years.
- can affect any vulnerable adult over the age of 18 years.
- can still be exploitation even if the activity appears consensual.
- can involve force and/or enticement –based methods of compliance and is often accompanied by violence or threats of violence.
- can be perpetrated by individuals or groups, males or females and young people or adults.
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status and access to economic or other resources.

If you become aware of child or young person who may be at risk a referral should be made to SPOC.

[Safeguarding children who may have been trafficked](#)

[Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

**KCSIE 2022 states:** All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos<sup>9</sup> can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

### **Children at risk of Sexual Exploitation (CSE)**

Both Child Criminal Exploitation and Child sexual exploitation is a form of abuse that occurs when 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 in sexual or criminal activity a) in exchange for something the victim needs or wants, and/or b) for financial advantage or increased status of the perpetrator or facilitator. This abuse can occur with male or female, adults or children and can be a one-off event or a series. Criminal and sexual exploitation of females can present differently in girls to boys as well as potential indicators.

### **The three main types of child sexual exploitation:**

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.

### **Inappropriate relationships**

- Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

### **Boyfriend/Girlfriend**

- Abuser grooms a victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims may be required to attend parties and sleep with multiple men/women and threatened with violence if they try to seek help.

### **Organised exploitation and trafficking**

- Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

### **Indicators of child sexual exploitation may include:**

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation.
- Gang-association and/or isolation from peers/social networks.

- Exclusion or unexplained absences from the College.
- Leaving home/care without explanation and persistently going missing or returning late.
- Excessive receipt of texts/phone calls.
- Returning home under the influence of drugs/alcohol.
- Inappropriate sexualised behaviour for age/sexually transmitted infections.
- Evidence of/suspicions of physical or sexual assault.
- Relationships with controlling or significantly older individuals or groups.
- Multiple callers (unknown adults or peers).
- Frequenting areas known for sex work.
- Concerning use of internet or other social media.
- Increasing secretiveness around behaviours. and
- Self-harm or significant changes in emotional well-being.

### **Potential vulnerabilities**

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

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

If the DSL becomes aware of child that may be being sexual exploited, they should refer to SPOC.

[Child sexual exploitation – DfE guidance](#)

### **Serious Violent Crime - people at risk from gang activity or serious youth violence**

The College is a source of safety and security for many young people. Supporting young people to build resilience and raise their awareness of the risks associated with gangs and serious youth violence is key to helping keep young people safe in their communities.

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

- Increased absence
- Change in friendship groups
- Relationships with older individuals or groups
- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions

These may indicate involvement or approach by criminal networks or gangs.

The College is alert to the possibility of children and young people bringing weapons onto their site. There are various reasons why a young person may be carrying a weapon. These should be explored with the young person.

Under Croydon's weapons in schools and college protocol the police must be informed via 101 of any student found in possession of a weapon in the College or any weapon that is found on the college site.

[Preventing youth violence and gang involvement](#)

### **Domestic abuse and/or sexual violence**

Exposure to domestic abuse can have a significant impact on children's emotional development and mental health. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

### **Operation Encompass**

Croydon is part of the Operation Encompass service which operates in all police forces across England. It helps police and education settings work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) before the child or children arrive at the College the following day. This ensures that the College has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police or the College should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website. (KCSIE 2022)

**National Domestic Abuse Helpline** - Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

The College will refer young people who are victims of domestic or sexual violence to SPOC.

Further advice and guidance can be obtained from the Family Justice Centre who can be contacted by phoning their helpline of 0208 688 0100 or by emailing [fjc@croydon.gov.uk](mailto:fjc@croydon.gov.uk)

**Additional advice** on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects • Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse.
- Domestic abuse: specialist sources of support - GOV.UK ([www.gov.uk](http://www.gov.uk)) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)

- Home : Operation Encompass (includes information for schools and colleges on the impact of domestic abuse on children)

Specific guidance on adolescent to parent violence and abuse is published by the Home Office

[Adolescent to parent violence and abuse \(APVA\)](#)

### **Prevention of Radicalisation and Extremism**

The College's safeguarding duty includes the duty to promote British values in order to counter the extremist narrative and prevent young people from being radicalised and drawn into terrorism.

[Promoting fundamental British values as part of SMSC in schools](#)

Under Counter-Terrorism and Security Act 2015, the College also has a duty to refer young people on to Croydon's Channel Panel under the Prevent strategy where there are concerns that they are being radicalised.

[The Prevent Duty](#)

Where the College has concerns that a young person might be considering extremist ideologies and/or may be radicalised and would benefit from specialist support to challenge extremist ideologies, or that a younger pupil may be at risk due to their parent's radicalisation, the College will make a referral to SPOC using the SPOC Safeguarding Referral Form.

### **Risk indicators of vulnerable pupils**

#### **Indicators of an identity crisis include the following:**

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society

#### **Indicators of a personal crisis include the following:**

- Family tensions
- A sense of isolation
- Low self-esteem
- Disassociation from existing friendship groups
- Searching for answers to questions about identity, faith and belonging

#### **Indicators of vulnerability through personal circumstances include the following:**

- Migration
- Local community tensions
- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination

#### **Indicators of vulnerability through unmet aspirations include the following:**

- Perceptions of injustice
- Feelings of failure
- Rejection of civic life
- Indicators of vulnerability through criminality
- Experiences of dealing with the police
- Involvement with criminal groups

#### **Critical indicators include where the pupil is:**

- In contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues



- Joining extremist organisations
- Making significant changes to their appearance and/or behaviour

**When making a judgement, staff may consider the following questions:**

- Does the pupil have access to extremist influences?
- Does the pupil access the internet for the purposes of extremist activities?
- Has the pupil witnessed or become the victim of racial or religious hate crimes?
- Does the pupil vocally support terrorist attacks, either verbally or in their written work?
- Is there a pattern of regular or extended travel within the UK?
- Does the pupil have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the pupil have insecure, conflicted or absent family relationships?
- Has the pupil experienced any trauma in their lives, particularly trauma associated with war or conflict?
- Is there evidence that a significant adult or other person in the pupil's life has extremist views or sympathies?
- Is the pupil the victim of social isolation?

**Educate Against Hate**, a website launched by Her Majesty's Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British Values) to help recognise and address extremism and radicalisation in young people.

**Channel** is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools and colleges to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

*The College should always be a safe space for young people to explore new ideas and perspectives, and develop their critical thinking skills. Where there are concerns about radicalisation and a referral to Channel Panel is being considered the College discusses these concerns internally and also considers external advice and guidance where necessary and appropriate.*

*The College's designated safeguarding lead should be consulted for internal advice on making a referral. Prior to making a referral the College may also speak to and get advice from their police schools officer). the SPOC Professionals' Consultation Line. and/or Croydon's Prevent Co-ordinator (Haydar Muntadhar: email [haydar.muntadhar@croydon.gov.uk](mailto:haydar.muntadhar@croydon.gov.uk). tel. 0208 726 6000 (ext. 62070)*

**Mandatory reporting of Female Genital Mutilation (FGM)**

FGM refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons and is illegal in the UK. FGM typically takes place between birth and around 15 years old. however, it is believed that the majority of cases happen between the ages of five and eight.

**Risk factors for FGM include:**

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

**Symptoms of FGM**

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-college to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

### **Indications that FGM may have already taken place may include:**

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

The College will follow the statutory guidance on FGM in order to safeguard girls who are at risk of FGM: [Multi-agency statutory guidance on female genital mutilation](#)

Where a pupil makes a disclosure of FGM, the College will follow the mandatory reporting rules and make appropriate referrals to the police and SPOC using the SPOC Safeguarding Referral Form.

**So-called 'honour-based' abuse (HBA)** encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including **Female Genital Mutilation FGM** (mentioned above), forced marriage, and practices such as breast ironing.

**Breast Ironing** is practiced in some African countries, notably Cameroon. Girls aged between nine and 15 have hot pestles, stones or other implements rubbed on their developing breasts to stop them growing further. Breast Ironing is usually carried out by mothers or other women to protect girls from men. It is believed that the reason they carry out this procedure is to reduce the risk of sexual harassment, rape, kidnap and forced marriage. Indicators that Breast Ironing has been carried out are chest pains or other discomfort, changes in behaviour and fear of undressing.

If the College becomes aware of a child that may be at risk of a **forced marriage**, they should in the first instance to SPOC. If a child is at immediate risk they should contact the police.

Further advice on forced marriage can be obtained from the Foreign and Commonwealth Office's Forced Marriage Unit by phone 0207 008 0151 or emailing [fm@fco.gov.uk](mailto:fm@fco.gov.uk)

[Forced marriage - FCO Guidance](#)

All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

### **Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk))

### **Children Requiring Mental Health Support**

The College play a key role in supporting the emotional health and well-being of students. In some cases, mental health can be an indicator of abuse and all provisions should have clear procedures on how to access the appropriate support for these children.

Children who have experienced abuse and Adverse Childhood Experience (ACEs) through traumatic events are likely to be impacted. Only appropriately trained professionals should make diagnosis. The

Additional documents listed below may also assist in supporting children and young people. See [Rise Above](#) for links to all materials and lesson plans.

## **Online Safety**

As part of their duty to provide a safe learning environment, the College ensures students know how to remain safe online.

There is considerable risk to children online, but they can be categorised within these three areas as stated within KCSIE:

### **content:**

- being exposed to illegal, inappropriate or harmful content. for example: pornography, fake news, racist, misogynistic, self-harm, suicide, anti-Semitic, radical and extremist.

### **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 for the purposes of grooming children. and

### **conduct:**

- personal online behaviour that increases the likelihood of, or causes, harm. for example, making, sending and receiving explicit images, sharing others explicit images and online bullying.

### **commerce:**

- risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Educating children and young people to stay safe online is crucial in the modern world. Other websites that can assist are.

[Be internet legends](#)

[Disrespect Nobody](#)

[PSHE Association](#)

[ThinkUKnow](#)

[Safer Internet centre](#)

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies aims to do all that they reasonably can to limit children's exposure to the above risks from the College's IT system. As part of this process, the governing body ensures the College has appropriate filters and monitoring systems in place.

The appropriateness of any filters and monitoring systems are informed in part, by the risk assessment required by the Prevent Duty.

Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place, in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

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## Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include.

- unauthorised access to computers (illegal 'hacking'), for example accessing the College's computer network to look for test paper answers or change grades awarded.
- denial of Service (Dos or DDoS) attacks or 'booting'. Attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources. and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: [Cyber Choices](#), 'NPCC-When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

## Looked after and Previously Looked After Children and Care Leavers

The College recognises that looked after and previously looked after children and care leavers are particularly vulnerable due to their status and their pre-care experiences.

The College's designated teacher for LAC and care leavers has specialist knowledge of the issues faced by this cohort and for this reason, the designated safeguarding lead will consult with the designated teacher to seek advice whenever there are concerns about the welfare of a looked after or previously looked after child or care leaver.

The Virtual School Head is the lead responsible officer for ensuring that arrangements are in place to improve the educational experiences and outcomes of a local authority's looked-after children, including those placed out-of-authority. More information about supporting children who are looked after in achieving their potential can be found in [Promoting the Education of Looked After Children](#).

### Additional procedures

*The College is aware of the new duty to promote the education of previously looked after children. these are defined as children who have left the care system as a result of adoption or special guardianship order. It is recognised that these children may face the same difficulties and have the same vulnerabilities as looked after children.*

*The College also considers the potential vulnerability of relevant children. these are children who under the Leaving Care Act are children who are aged 16-17 and who were but are no longer looked after.*

*Many looked after young people in Croydon who are aged 16 and 17 who remain looked after may be living in semi-independent accommodation and are particularly vulnerable to a wide range of safeguarding issues and it is imperative that the designated safeguarding lead links with the designated LAC teacher where safeguarding concerns are raised.*

## Children who are lesbian, gay, bi, or trans (LGBT)

Children being LGBT is not a safeguarding concern in itself but it is important to be aware that they can be targeted by others. This can increase the vulnerability of these children. It is important to consider helping

LGBT children to identify a trusted adult who they can talk to as well as provide safe places within the College to talk about their concerns.

LGBT inclusion is part of [Relationships Education and Relationships and Sex Education curriculum](#). There is a range of support available to help schools address homophobic, biphobic and transphobic bullying and abuse.

### **Children with Special Education Needs and Disabilities (SEND)**

The College is aware that children with special education needs may be more vulnerable to harm and abuse and may be more likely to experience bullying.

They can face additional safeguarding challenges because.

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs.
- difficulties may arise in overcoming communication barriers.
- there may be a higher risk of peer group isolation

College policies reflect these issues and recognise that staff need to be able to help this group to overcome barriers to seeking help. The College identifies pupils who might need more support to be kept safe or to keep themselves safe.

### **Privately Fostered Children**

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent but is a 'close relative' for 28 days or more. The College has a legal duty to notify Croydon of any pupils they know to be private fostered. The designated safeguarding lead should refer to SPOC any private fostering arrangements that come to their notice.

### **Why are children in Private Foster Care?**

Most frequently, young people are in private foster care for the following reasons:

- children from other countries sent to live in the UK with extended family
- host families for language schools
- parental ill-health
- where parents have moved away, but the child stays behind (e.g. to stay at the same school to finish exams)
- teenagers living separately from their own family
- children brought from outside the UK with a view to adoption
- children at independent boarding schools who do not return home for holidays and are placed with host families

### **Are children in private foster care defined as 'Local after Children'?**

No. The term 'Looked after Children' means children who are looked after by the local authority. Privately fostered children are outside the care of the local authority. The College therefore does not code children in private foster care as 'LAC'.

### **Young Carers**

If the College has concerns about a pupil they believe to be a young carer, staff can contact the Young Carers Service on 0208 649 9339.

Further details can be found on their website – [www.talkofftherecord.org](http://www.talkofftherecord.org)

### **Fabricated or Induced Illness**

Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

## Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being evicted from a property. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

## Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed and there are two [age appropriate guides](#) to support children.

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

## Children who are missing from education (CME)

*The College is aware of those children who are persistently absent or missing from college as this may be an indicator of welfare concerns.*

*Attendance policies states clearly who needs to be notified and what action should be taken and any relevant timescales. Parents should be asked to provide contact details for at least 1 person who can be contacted in the event that a child does not attend college.*

*Where a parent notifies the College that they are removing the child so they can be educated at home, the following notifications should be made:*

- The Learning Access team must be notified of all decisions.*
- If the child is already known to children's social care, their allocated social worker should be notified immediately.*
- If the child is not known to children's social care, but the College has concerns about their welfare, the designated safeguarding lead should make a referral to children's social care via SPOC.*

Further information for colleges providing education for a child of compulsory school age can be found in: [Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges.](#)

## Opportunities to Teach Safeguarding

The Governing body ensures the College provides opportunities for children to learn about Safeguarding. General issues may be addressed through the broad and balance curriculum already in the College but key issues relevant to the community and sensitive issues may be taught through tutorial sessions.

The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here: [Teaching about relationships sex and health.](#)

This includes teacher training modules on the RSHE topics and non-statutory implementation guidance. The following resources may help those in the College that teach about safeguarding: DfE advice for schools: teaching online safety in schools.

UK Council for Internet Safety (UKCIS) guidance: Education for a connected world.

UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people.

The UKCIS external visitors guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors.

National Crime Agency's CEOP education programme: Thinkuknow.

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## **The Child's Wishes**

The best interest of the child should always be at the heart of any decision-making process around safeguarding. The Governing Body and college leaders should always make sure the child's wishes and feelings are taken into account when decisions for support are made, and actions taken.

## **Other relevant safeguarding guidance**

*Additional guidance, policies and procedures at:*

[CSCB local policies and procedures](#)

[CSCB Safeguarding in Education Toolkit](#)

[DfE Alternative Provision guidance](#)

[DfE School Attendance guidance](#)

[DfE School Attendance Parental Responsibility Measures guidance](#)

[DfE Behaviour and Discipline in Schools guidance](#)

[DfE Preventing and Tackling Bullying guidance](#)

[DfE Children Missing Education guidance](#)

[DfE Best Practice Advice for School Complaints Procedures](#)

[DfE and ACPO Drug Advice for School guidance](#)

[DfE Advice for Schools on Equality Act 2010](#)

[DfE Exclusion from maintained schools, academies and PRUs in England](#)

[DfE Supporting pupils at school with medical conditions](#)

[DfE Guidance on First Aid for Schools](#)

[DfE Mental health and behaviour in schools](#)

[DfE Use of reasonable force guidance](#)

[DfE Promoting fundamental British values as part of SMSC in Schools](#)

[DfE The Prevent Duty – Advice for Schools](#)

[DfE Sexual violence and sexual harassment between children in schools and colleges](#)

[DfE Children who run away or go missing from home or care](#)

[Child sexual exploitation – DfE guidance](#)

[Preventing youth violence and gang involvement](#)

[Safeguarding children who may have been trafficked](#)

[Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

[Preventing and tackling Bullying](#)

[Promoting children and young people's emotional health and wellbeing](#)

[Rise Above](#)

[Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, parents and carers](#)

[Domestic Abuse: Various information/Guidance](#)

[Faith Based Abuse](#)

[Relationship Abuse: disrespect nobody](#)

[Homelessness: how local authorities should exercise their functions](#)

[Private Fostering](#)

[Upskirting: know your rights](#)

## **PART 2 Responsibility of Governors, Proprietors and Management**

Legislation and the Law which Governing Bodies and proprietors adhere to, can be found on pages 23-26 KCSIE 2022.

**Croydon's Children Families & Education Directorate**

The Directorate includes services that will support the College to safeguard and promote the welfare of pupils by:

- co-ordinating the delivery of integrated children's services within the borough, including an early help service
- providing statutory social work services under the Children Act 1989/2004
- providing the College with advice, support and guidance, model policies and procedures, training and dedicated lead officers with responsibility for child protection, safeguarding and online safety
- dealing with allegations against members of staff and volunteers through the Local Authority Designated Officer (LADO)
- taking responsibility for those children who are not in education, including children who are known to be home educated.

## **Governing Board**

The Governing Board will ensure that the College meets its statutory duties with regard to safeguarding and protecting pupils and that the following are in place:

- The College has the following policies in place and that these are regularly monitored, reviewed and updated where necessary.
  - safeguarding policies and procedures covering early help and child protection that are consistent with Croydon Safeguarding Children Board procedures and Croydon's internal policies
  - a staff code of conduct policy including policies covering staff/pupil relationships and communications and staff use of social media
  - a procedure for responding to incidents where children go missing from education, particularly where there are repeated incidents that suggest potential safeguarding risks may be present.
- The College is able to work jointly with other agencies in order to ensure pupils can access help and support from early help services and statutory social work services and that children's plans are implemented and monitored.
- A member of staff is appointed as the Designated Manager to address allegations against staff
- The Chair of the Governing Board is aware that they are responsible for liaising with the LADO in the event of an allegation against the head teacher.
- A senior member of staff is appointed as the designated safeguarding lead with responsibility for carrying out the statutory duties as set out in this policy, the individual is given sufficient time and resources to carry out their responsibilities and that another member of staff is appointed to deputise in their absence.



- There is a designated teacher nominated to promote the educational achievement of looked after children and previously looked after children and that this person has received appropriate training for the role.
- Staff receive a thorough induction on joining and are given copies of all relevant safeguarding and child protection policies and the staff code of conduct policy.
- Staff are confident that they can raise issues with leaders where there are concerns about safeguarding practice at the College and there are robust whistleblowing procedures in place.
- Steps are taken to ensure parents and pupils are aware of the College safeguarding and child protection policies and procedures.
- Governors ensure children are given opportunities within the curriculum to learn how to keep themselves safe, including on-line.
- The College has appropriate written procedures in place to ensure safer recruitment practices and reasonable checks on visitors to the school, to deal with allegations against staff or volunteers and to report matters to the Disclosure and Barring Service as required, and that these policies are consistent with statutory guidance and reviewed on an annual basis.
- At least one member of the Governing Board has undertaken accredited safer recruitment training.
- There is a nominated member of the Governing Board who is responsible for Safeguarding and holds school accountable of their statutory duties.
- All staff receive safeguarding and child protection training every year and receive regular updates from the designated safeguarding lead to ensure they remain up to date with new legislation. Free safeguarding training is available for all Croydon schools via the [Learning & Development section of the CSCB website](#).
- The College has procedures in place to deal with allegations made against other pupils.
- Children's wishes and feelings are taken into account when deciding on what action to take or services to provide to protect individual children and there is a robust system in place for gaining feedback from pupils.

### ***The Principal***

The principal will ensure that the College meets its statutory safeguarding duty by ensuring the following:

- Staff are inducted thoroughly and have read all the colleges' safeguarding and child protection policies, behaviour policies and the CSCP children missing from education policy so that they are fully aware of their role in safeguarding children and are able to fully implement policies.
- All staff are able to identify those children who need extra help and know how to make, or request appropriate referrals to early help services.
- All staff are vigilant to harm and abuse, are able to identify those children for whom there are child protection concerns and know how to make, or request appropriate referrals to children's social care.

- Staff are able to work in partnership with other agencies to safeguard children, including providing early help support, contributing to assessments and the implementation of the child's plan, attending network meetings and case conferences, monitoring children's progress and liaising with social workers.
- Staff are encouraged to attend learning events and participate in audit activity provided by the Safeguarding Children Partnership as well as promote published learning from events and serious case reviews.
- A Designated manager is appointed to manage allegations against staff
- Safer recruitment practice is followed when recruiting to posts and appropriate action is taken whenever an allegation is made against a member of staff.
- The college offers a safe environment for staff and pupils to learn.
- Safeguarding issues are brought to the attention of the governing body.

### **PART 3 Safer recruitment**

#### **General Principles**

The college recognises safer recruitment practices are an essential part of creating a safe environment for children and will ensure that staff working in the college are suitable do to so and do not pose any kind of risk to children.

The College will follow the *Keeping Children Safe in Education* guidance (DfE 2022, part 3).

- The College will carry out extensive checks and enquiries on applicants for all positions, including voluntary and support roles and governors and those involved in the management of an independent school, in accordance with statutory requirements. The College considers completing online searches of the applicant as needed.
- Checks with the Disclosure and Barring Service will be carried out at the level appropriate to the candidate's role in the school. Types of DBS checks can be found on Page 61 KCSIE 2022.
- All job advertisements and application forms will clearly state that the role is a safeguarding role and that applicants will be clear that safeguarding checks will be completed as part of safer recruitment practices.
- Staff and governors who normally sit on interview panels will have at least one member trained in safer recruitment and no interview should go ahead unless this is the case. The College takes up the accredited safer recruitment training offered through the Croydon Safeguarding Children Board or other accredited training providers.
- Although the Principal will have day-to-day responsibility for the recruitment of staff, the Governing Board will ensure that they maintain an overview of recruitment systems in order to scrutinise practise and ensure all statutory checks are carried out.

- Staff responsible for carrying out recruitment checks should ensure they have a copy of any relevant documents or take relevant issue numbers from documents as proof that the document has been seen.
- Checks will be taken out on existing staff where concerns arise regarding their suitability to work with children or a person moves into a post that is a regulated activity.
- The principal will be responsible for keeping a single central record of all staff that provides education to children.
- The single central records should include details of all checks carried out and the outcome of these checks or any certificates obtained.
- Where the college has salaried trainee teachers, the college will ensure that all necessary checks are carried out on the trainees, including DBS checks, and that the outcome of these checks is recorded on the single central record.
- Where staff are recruited via third parties such as employment agencies, the principal will:
  - seek written confirmation from the agency that the agency has carried out all necessary checks on the individual
  - request written confirmation of the outcome of all checks
  - request written confirmation that an enhanced DBS certificate has been received by the agency
  - check the identity of agency staff when they first present for work to ensure they are person against whom the checks were taken out.

### **Checks to be carried out**

Further descriptions about the types of checks can be found on pages 55, 62 and 67 KCSIE 2022. Also available of the [DBS website](#). The DBS maintains 'barred lists' of those unsuitable to work with children and vulnerable adults.

In the recruitment and selection of staff and volunteers the College will at all times adhere to the government guidance contained within "*Working Together to Safeguard Children*" (July 2018) and '*Keeping Children Safe in Education (DfE 2022)*'.

The College will verify the following information for **all** new staff and record on the single central register/record:

- The applicant's identity must be verified from their passport or other photographic ID and proof of address must be provided. Guidance on checking identity can be accessed at [GOV.UK](#)
- a standalone children's barred list check
- an enhanced DBS check (with children's barred list check) requested/certificate provided
- a prohibition from teaching check
- further checks on people who have lived or worked outside the UK (see paragraphs 280-285 KCSIE 2022)
- a check of professional qualifications, where required, and,
- a check to establish the person's right to work in the United Kingdom.

*The College is aware of the following central government guidance:*  
[Criminal records checks for overseas applicants - Publications - GOV.UK](#)  
[Employing overseas-trained teachers from outside the EEA - Publications - GOV.UK](#)  
[Disqualification by Association](#)  
[DBS and Filtering](#)

In addition:

- colleges **must** record whether the person's position involves 'relevant activity', i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18, and

### **Retention of Documents**

The College will keep copies of the following documents on staff personnel files:

- documents used as proof of identity such as passports or driving licences.
- A copy of the DBS **does not** have to be kept. If schools/colleges choose to keep a copy, guidance should be sought through [GOV.UK](#) in order to adhere to the requirements of the Data Protection Act 2018.
- **Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10.** A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file.
- For those who have lived or worked outside of the UK, they **MUST** undergo the same checks as all other staff in schools and colleges. Further guidance on these checks can be found on Page 72 KCSIE 2022.

If the College knows or has reason to believe that an individual is barred, it commits an offence if it allows the individual to carry out any form or regulated activity. There are penalties of up to five years in prison if a barred individual is convicted of attempting to engage or engaging in such work. (KCSIE 2022)

### **Agency Staff**

The College must obtain written notification from the agency that the relevant checks have been completed before they work within the college. The written confirmation **MUST** contain state that the certificate has been obtained. Where there is a disclosure of any matter or information on the certificate, the employment business **MUST** obtain a copy of the certificate from the agency.

It is recommended that schools should also check the identity of the person presenting themselves, is the same person whom the checks have been completed for.

### **Volunteers**

Under no circumstances will a volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

The head Principal will ensure that the following are carried out in relation to unpaid volunteers such as parents who accompany pupils on outings or provide help in the classroom:

- All volunteers will be required to undergo a recruitment process, such as references, DBS and other checks and interviews that is appropriate and proportional to the duties assigned to them.

- Volunteers who are carrying out a regulated activity, for example being left unsupervised with children or providing personal care to children will be subject to an enhanced DBS check, including barred list information.
- New volunteers who are not carrying out regulated activity but who have an opportunity for regular contact with children will be subject to an enhanced DBS check but this may not include a barred list check.
- For other volunteers who are not carrying out regulated activity and do not have regular contact with children, the head teacher/principal will carry out a risk assessment to decide whether an enhanced DBS check should be carried out depending on:
  - the nature of the role
  - what information is already known about the volunteer
  - what references from work or volunteering activity the volunteer has provided regarding suitability
  - whether the role is eligible for an enhanced DBS check.
- The college will ensure that all volunteers are competent to carry out the duties assigned to them and are only assigned duties that are suitable to their qualification and experience.
- Volunteers carrying out regulated activity but for whom a DBS check has not been carried out will be suitably supervised by teaching staff at all times at a level that ensures the safety of pupils.
- All volunteers will be fully inducted in relation to all relevant policies and procedures.

### **Trainee / Student Teachers**

Applicants for initial teacher training who are employed by the college, the college **must** make the necessary checks. If the student is fee funded, it is the responsibility of the training provider to carry out necessary checks. Written confirmation of checks should be obtained by the college.

The College have a legal duty to refer anyone to the DBS who has harmed, poses a risk of harm to a child or vulnerable adult. (Full details can be found in KCSIE 2022 P75)

### **References**

- Applicants will be asked to provide a full employment history and details of referees, including previous and recent employers, and who should be a senior member of staff with the authority to provide references. References should be sought **before** interviews and references from colleagues will not be acceptable.
- All references will be requested directly from the referee, including references for internal candidates. Referees will be contacted to resolve any issues that emerge from the references provided. Open references will not be accepted (e.g. to whom it may concern)
- References will be taken up from current employers only and of a senior level. If the applicant is not currently employed, verification will be sought from their previous employment as to the dates the applicant was employed and the reasons for leaving the post.

- Any information provided by applicants as part of an application process will be verified with independent sources and any reference received electronically will be checked to verify the originating source.
- The College will follow up gaps in previous employment
- Always verify any information with the person who provided the reference and ensure electronic copies come from a legitimate source
- Compare information on the reference to that on the application and follow up on discrepancies with the candidate
- Establish reasons for the candidate leaving their current or most recent post

### **DBS checks**

In order to ensure that people who work in the college are suitable to do so and are not barred from working with children, the college will apply to the Disclosure and Barring Service (DBS) for police checks and other barred list information as part of the recruitment process.

Where a DBS check indicates previous concerns, the Head should conduct a risk assessment as to the suitability of the applicant to the post. This risk assessment should take account of the level of offending, when the offences occurred and the circumstances around the offences. The assessment should be recorded and placed upon the personnel record of the applicant.

Full DBS checks which include barred list checks will only be taken out on individuals who are involved in regulated activity. This is defined as close, unsupervised contact on a regular basis involving activities such as:

- teaching
- training
- supervising
- care
- guidance and advice
- driving a vehicle
- personal or intimate care.

The activity must be carried out regularly as part of the staff member's day to day responsibilities and the checks will be reasonable in order to safeguard children.

Full DBS checks with barred list checks will also be carried out on permanent staff members working at the college or unpaid volunteers who regularly work unsupervised at the college and whose work means they have an opportunity for regular contact with children.

Other staff, contractors and supervised volunteers who have opportunities for regular contact with children but do not carry out a regulated activity will be subject to an enhanced DBS check but **not** barred list checks.

The college has robust procedures for day to day staff management and supervision and clear procedures for reporting and acting on concerns. Staff carrying out roles involving regulated activity will be suitably supervised on a regular basis by senior staff carrying out a similar role.

The college will ensure that all DBS checks carried out on staff are renewed after 3 years of the original DBS disclosure.

**Conduct and safe teaching practice**

- The College expects staff and volunteers to set a good example to pupils through their own conduct and behaviour and aims to protect them from the risk of allegations being made against them by ensuring they maintain high standards of professionalism and appropriate boundaries.
- Procedures are in place for the two areas of allegation, those that MAY meet the threshold of harm and those that DO NOT meet the harm threshold (known as 'low-level concerns'.)
- The Principal will ensure that there is a written code of conduct in place and that each member of staff, including volunteers, signs a code of conduct agreement on appointment that sets out the college expectations with regards to standards of professional behaviour and that all staff receive copies of relevant policies.
- Governors will have their own separate code of conduct. This is a responsibility of the governing board or trust.
- Staff will be expected to follow the College social media policy in terms of their use of social media, particularly in relation to professional standards and relationships with pupils and/or their families. All staff and volunteers will sign an acceptable use agreement before being given access to the College computer system.

In the event that an allegation is made against a member of staff or volunteer, the College will follow Croydon's procedures for managing allegations against a member of staff.

[The Management of Allegations against Staff who work with Children and Young People](#)

The Governing Board will appoint the Principal as the Designated Manager for the purposes of the allegations procedures and who will link with the Local Authority Designated Officer (LADO) for all allegations raised. A further staff member will be identified as their deputy to act in their absence or if allegations are made against the responsible staff member.

**All** allegations in relation to staff members will be referred to the head teacher. Allegations against the head teacher will be referred to the Chair of the Governing Board.

**Allegations that meet the harms threshold**

An allegation is any information which indicates that a member of staff/volunteer may have:

- ***Behaved in a way that has, or may have harmed a child***
- ***Possibly committed a criminal offence against/related to a child***
- ***Behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children***
- ***Behaved or may have behaved in a way that indicates they may not be suitable to work with children***

The last point includes behaviour that may have happened outside of the College making them unsuitable to work with children. Known as *Transferable Risk*. Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. Such assessments should be completed in conjunction with the local authority designated officer (LADO).

This applies to any child the member of staff/volunteer has contact within their personal, professional or community life. The person to whom an allegation is first reported should take the matter seriously and



keep an open mind. S/he should not investigate or ask leading questions if seeking clarification. It is important not to make assumptions. Confidentiality should not be promised and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the head teacher/principal. If the concerns are about the head teacher/principal, the Chair of the Governing Board should be contacted.

The principal will always consult the Local Authority Designated Officer (LADO) immediately the College is aware of an allegation.

Following consultation, the LADO in agreement with head teacher/principal will decide on appropriate action and consider:

- An immediate risk assessment
- \*immediate referral to the Police
- consideration of disciplinary proceedings
- consideration of a senior strategy meeting

*Looking after the welfare of the child* - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Part one of this guidance.

*Investigating and supporting the person subject to the allegation* - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

It is important to bear in mind that although the concern may relate to an individual pupil/student, other pupils/students may also be at risk. The procedures in "Safeguarding Children and Safer Recruitment in Education" (DfE, 2006 – Updated 2011), Working Together to Safeguard Children (July 2018) and Guidance for local authorities, head teachers, staff, governing bodies and proprietors of independent schools" (DfE 2011) will be followed in such cases.

When appropriate (*see guidance above*), consideration will be given to referral of a member of staff to the DBS for consideration of the case. If a member of staff believes a reported allegation or concern is not being dealt with appropriately, they should report the matter to the Local Authority Designated Officer (LADO) to give support and direction on how to proceed.

All procedures set out in Part 4 of KCSIE 2022 will be adhered to alongside previously mentioned documents and used as guidance when managing allegations of any kind.

Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found on GOV.UK.

### **Concerns that do not meet the harm threshold - Low Level Concerns**

***All concerns regarding the conduct of staff working with children should be referred to the LADO to consider whether the threshold for LADO involvement is met.***

Following on from submissions made by the London LADO Regional Group to the London Safeguarding Partnership, the London procedures have been altered to reflect LADO's concerns regarding the adoption of Low-level Concerns by KCSIE.

### **Allegations Against Staff and Volunteers, including supply staff**

### **Low level concerns**

As part of our approach to safeguarding, the College promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the College (including supply teachers, volunteers and contractors) can be raised and are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one)) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

This should enable the College to identify concerning, problematic or inappropriate behaviour early, minimise the risk of abuse, and ensure that adults working in or on behalf of the college are clear about professional boundaries.

### **What is a low-level concern?**

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in *paragraph 355 KCSIE 2022*. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the College may have acted in a way that isn't quite right. This may be that they are 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 by the LADO to be serious enough to consider a referral.

It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one KCSIE 2022), 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 the College from potential false allegations or misunderstandings.

Low level concerns should be shared as with any other concerns and recorded for future reference in order to identify any potential patterns of inappropriate behaviour. All records should be kept securely and confidentially and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

More detailed guidance and case studies on low-level concerns can be found in [Developing and implementing a low-level concerns policy \(farrer.co.uk\)](https://www.farrer.co.uk/developing-and-implementing-a-low-level-concerns-policy).

### **Whistleblowing**

The College fosters a culture of openness in line with the "Freedom to speak up" review and will put in place strategies and procedures to ensure that staff feel enabled to raise concerns relating to the safeguarding of children or poor practice within the College that may cause a risk to children.

The College recognises that there may be circumstances where staff and students feel unable to raise concerns or incidents of malpractice within the college environment as there is reasonable doubt that these would be dealt with adequately.

All staff and volunteers have a legal duty to raise concerns where they feel individuals or the College are failing to safeguard and promote the welfare of children.

Where it is not possible to raise concerns within the College, staff and volunteers may report concerns to the following.

- Croydon's lead officers for child protection or safeguarding where there are issues regarding the welfare of a pupil.

- The following numbers can be used where there are issues regarding the college’s overall procedures around safeguarding
  - Croydon Council’s confidential whistle blowing email address – [schoolwhistle@croydon.gov.uk](mailto:schoolwhistle@croydon.gov.uk)
  - the Ofsted whistle-blowing line on **0300 123 3155**
  - the NSPCC whistleblowing advice line on **0800 028 0285** is open from 8 am – 8pm Monday –Friday or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

The Principal is responsible for ensuring that these numbers are advertised on the College premises and made available to staff and pupils.

- The CSBC has an [escalation policy](#) which can used by staff

### **Behaviour management, physical intervention and reasonable force**

There are occasions where it may be appropriate for staff in the College to use reasonable force in order to safeguard students. The term ‘reasonable force’ is used to define an action where staff will need to intervene in order to prevent injury or violence. Further guidance can be found [here](#).

Physically handling children with SEND or medical needs requires further consideration as their additional needs make them more vulnerable. Individual behaviour plans are a way of planning ahead for such eventualities and allow parents to work with staff in constructing a plan that meets the individual needs of the pupil and provides a plan for all staff to be familiar with.

The College keeps a record of incidents of Reasonable Force.

*HM Government guidance [Reducing the need for restraint and restrictive intervention](#) provides information on how to support children and young people with learning disabilities, autistic spectrum conditions and mental health difficulties who are at risk of restrictive intervention in special education settings. This guidance may also be helpful for staff.*



**Responsibility for health and safety**

The Governing Board and head teacher/principal will ensure that there is a robust health and safety policy in place in order to meet the statutory responsibility for the safety of pupils and staff within the college environment. Further details are provided in the College's health and safety policy.

**Working with aggressive and violent parents**

Where the College are working with families who are known to children or adult social care and there are concerns about the behaviour of parents towards members of staff, this must be discussed with the head Principal and the designated safeguarding lead and the information shared with children's social care.

If there are high levels of risk involved in contact with parents, children's social care may convene a risk assessment meeting with the network in order to discuss strategies to reduce risk, and it is vital that College is part of this process.

**Site security and visitors**

- The Governing Board is responsible for the security of college premises and will take steps to ensure it is a safe environment and securely protected against trespass and/or criminal damage.
- The Principal will ensure that contractors have received the appropriate level of DBS checks before being allowed access to the building, depending on the level of access they are likely to have to pupils.
- Where the visitor is employed by an organisation where DBS checks are normally required, for example NHS staff, the DSL will request written confirmation that relevant checks have been carried out for that individual.
- All visitors and contractors will be:
  - informed to report to reception on arrival.
  - expected to provide proof of identity
  - expected to wear a name-badge or carry some form of identification at all times when on the college premises.
  - suitably supervised by college staff at all times.
  - made aware of college health and safety procedures.
- The Estate's Manager will ensure that any contract entered into with contractors' sets out clearly the expectations for worker's behaviour and the responsibility of contractors to monitor and ensure compliance with college policies.
- Contracted workers will not be allowed to approach or speak to pupils in any circumstances and must ensure that all equipment and working practices are in line with health and safety standards.
- Visiting organisations such as theatre groups who will be performing for or working directly with pupils will be expected to have adequate child protection procedures in place and must agree with class teachers in advance what level of supervision or contact they will have regarding pupils.

## Role of the designated safeguarding lead

The role of the designated safeguarding lead and their deputy is to take lead responsibility for safeguarding and child protection (including online safety) within the College and to be available during college hours for staff to discuss safeguarding concerns. This role should be explicit within their job description. They **MUST** be a **senior member** of staff from within the **leadership team**

The designated safeguarding lead (and their deputy) will:

- liaise with and manage referrals to relevant agencies such as Children's Social Care, the LADO, the Channel Panel, the Police and the Disclosure and Barring Service (DBS).
- keep the Principal informed of on-going safeguarding and child protection issues and enquiries, especially section 47 enquiries.
- provide advice and guidance for staff on safeguarding and child protection issues and manage referrals. This includes where a crime may have been committed to the Police as required. [NPCC - When to call the police](#) should help understand when to consider calling the police and what to expect when working with the police.
- ensure the College's safeguarding and child protection policies are up to date and consistent with Croydon's Safeguarding Children Board policies and that policies are reviewed annually.
- ensure all staff, including temporary staff, are aware of and understand policies and procedures and are able to implement them. These include KCSIE Part 1, the Code of Conduct, the Safeguarding Policy and the Behaviour Policy. They will be a point of contact for advice and support for staff as well as safeguarding partners.
- attend regular training, including Prevent awareness training, and the designated teachers meetings hosted by Croydon and the Safeguarding Children Board in order to keep up to date with new policy, emerging issues and local early help, safeguarding and child protection procedures and working practices.
- work with the Principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues
- provide regular updates to all staff members and governors on any changes in safeguarding or child protection legislation.
- Liaise with the wellbeing lead, where safeguarding concerns link to mental health.
- have an awareness of those children who may be in need, young carers and children who have special educational needs and liaise with the SENCO when considering any safeguarding action for a child with special needs.
- liaise with the designated teacher for CLA whenever there are safeguarding concerns relating to a looked after child or previously looked after child.

- oversee child protection systems within the college, including the management of records, standards of recording concerns and referral processes.
- provide a link between the College and other agencies, particularly children's social care and the Croydon Safeguarding Children Partnership.
- ensure staff, including temporary staff, receive appropriate safeguarding and child protection training every 2 years.
- ensure parents are fully aware of the College's policies and procedures and that they are kept informed and involved.
- all records are kept up to date and stored securely. It is good practise to keep a separate child protection file
- ensure relevant records are passed on appropriately when children transfer to other educational settings and where appropriate, share relevant information with schools or colleges to enable continued support of the child. This should be within 5 days of transfer.

FULL Details of the role of the designated safeguarding lead and deputy can be found in annex C of KCSIE 2022. It is important that the DSL and DDSL are fully aware of their role and have capacity to carry out all areas of this.

## CHILD PROTECTION. DEFINITIONS AND INDICATORS

### Definitions

Child protection is part of the safeguarding agenda that focuses on preventing maltreatment and protecting children at risk of neglect or abuse as well as witnessing the ill-treatment of others. Under the Children Act 1989, CSSW have a legal duty to investigate and take any action to protect children where there are concerns that they are at risk of suffering **significant harm**, which is defined as:

**Neglect:** failure to provide basic care to meet the child's physical needs, such as not providing adequate food, clothing or shelter. failure to protect the child from harm or ensure access to medical care and treatment.

**Physical abuse:** causing physical harm or injury to a child.

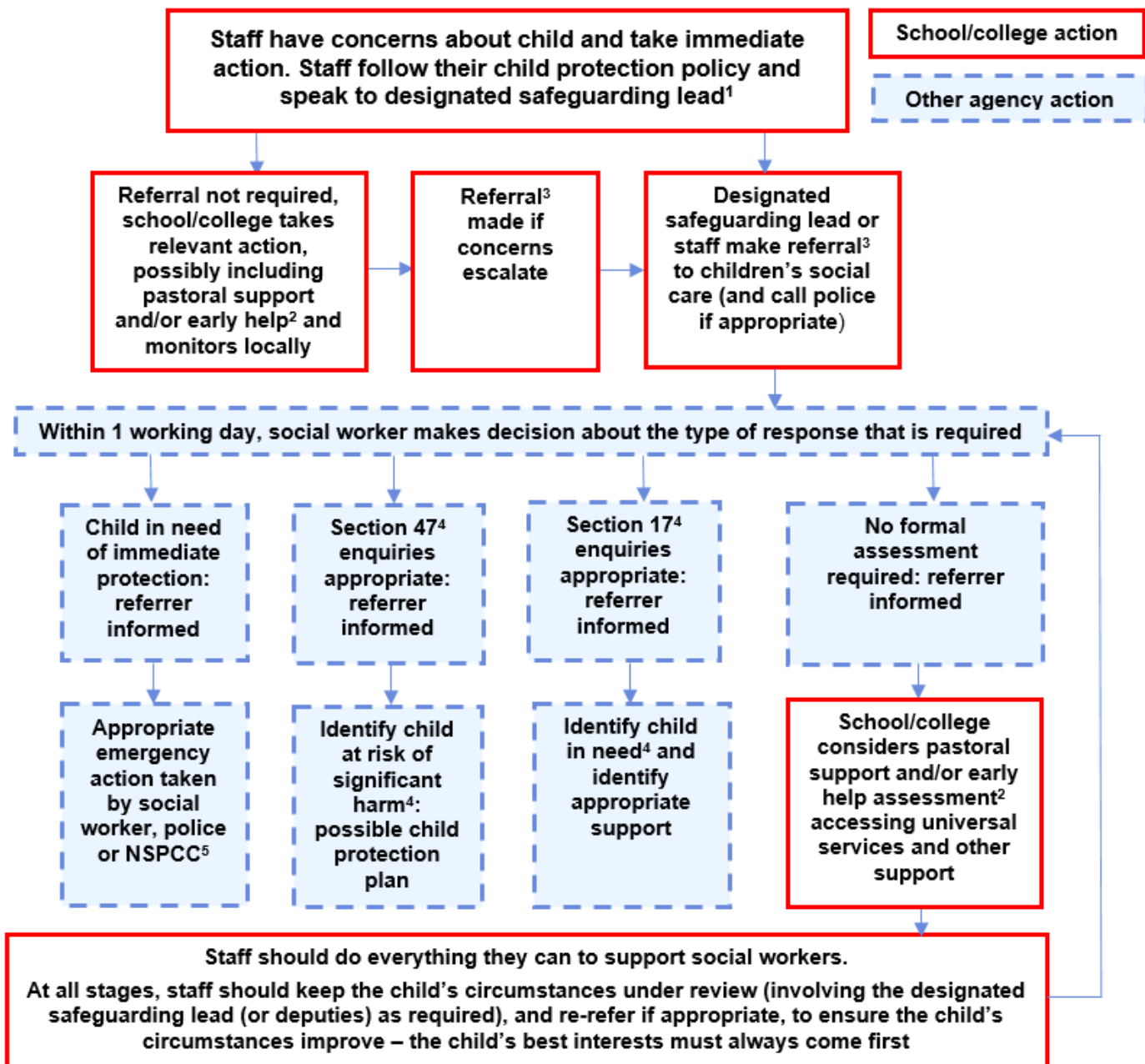
**Sexual abuse:** involving children in sexual activity, or forcing them to witness sexual activity, which includes involving children in looking at or the production of pornography.

**Emotional abuse:** failure to provide love and warmth that affects the child's emotional development. psychological ill treatment of a child through bullying, intimidation or threats.

### Possible indicators of abuse and neglect

<b>Neglect</b>	<ul style="list-style-type: none"> <li>• Inadequate or inappropriate clothing</li> <li>• Appears underweight and unwell and seems constantly hungry</li> <li>• Failure to thrive physically and appears tired and listless</li> <li>• Dirty or unhygienic appearance</li> <li>• Frequent unexplained absences from education</li> <li>• Lack of parental supervision</li> </ul>
<b>Physical abuse</b>	<ul style="list-style-type: none"> <li>• Any injury such as bruising, bite marks, burns or fractures where the explanation given is inconsistent with the injury</li> <li>• Injuries in unexpected places or that are not typical of normal childhood injuries or accidents</li> <li>• High frequency of injuries</li> <li>• Parents seem unconcerned or fail to seek adequate medical treatment</li> </ul>
<b>Sexual abuse</b>	<ul style="list-style-type: none"> <li>• Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child's age/stage of development</li> <li>• Sexual risk taking behaviour including involvement in sexual exploitation/older boyfriend</li> <li>• Continual, inappropriate or excessive masturbation</li> <li>• Physical symptoms such as injuries to genital or anal area or bruising, sexually transmitted infections, pregnancy</li> <li>• Unwillingness to undress for sports</li> </ul>
<b>Emotional abuse</b>	<ul style="list-style-type: none"> <li>• Developmental delay</li> <li>• Attachment difficulties with parents and others</li> <li>• Withdrawal and low self-esteem</li> </ul>
<b>Indirect indicators of abuse and neglect</b>	<ul style="list-style-type: none"> <li>• Sudden changes in behaviour</li> <li>• Withdrawal and low self-esteem</li> <li>• Eating disorders</li> <li>• Aggressive behaviour towards others</li> <li>• Sudden unexplained absences from education</li> <li>• Drug/alcohol misuse</li> <li>• Running away/going missing</li> </ul>
<b>Parental attributes</b>	<ul style="list-style-type: none"> <li>• Misusing drugs and/or alcohol</li> <li>• Physical/mental health or learning difficulties</li> <li>• Domestic violence</li> <li>• Avoiding contact with education and other professionals</li> </ul>

**Actions where there are concerns about a child (P22 KCSIE Sept 2022)**





## Annex 6: Single Central Record/Register (SCR)

### Please note:

- Checks carried out on volunteers and governors in an academy trust do not need to be recorded on the SCR under the latest version of Keeping Children Safe in Education (KCSIE), **but it is recommend including them**
- KCSIE does not say specifically that contractors must be on the SCR, but it does say all staff who work at a setting must be included, including supply staff, so it's best to include contractors too

### Important notes

This record should indicate what checks have been taken out for all staff providing education and/or whose positions involve a relevant activity

### Agency staff

Please give details of confirmation of checks that have been carried out by the supplying agency.

### Volunteers

- Unsupervised volunteers should not be left alone or allowed to work in regulated activity.
- For new volunteers in regulated activity who regularly teach children unsupervised an enhanced DBS is needed with a barred list check.
- For new volunteers not in regulated activity, HR should obtain an enhanced DBS certificate.
- Existing volunteers who provide personal care, the HR should consider obtaining an enhanced DBS.
- Existing volunteers who are unsupervised do not need to have a DBS check with a barred list check because the volunteer should have been checked originally.
- For existing volunteers not in regulated activity there is no requirement for an enhanced DBS check (a college can request one but may not request a check of the barred list).
- For a volunteer not engaging in regulated activity a risk assessment should be made and a professional judgement made about the need for an enhanced DBS check.
- Supervision of volunteers – there must be supervision by a person in regulated activity, where supervision occurs, this must be regular and day to day and the supervision must be reasonable in all the circumstances to ensure the protection of children.

### Regulated activity

Regulated activity (see p171 for definition) – the period condition is at any time on more than three days in any period of 30 days. 'Frequently' is doing something once a week or more. Work of the nature defined is considered regulated activity if done regularly. where this is the case an enhanced DBS check is needed with a barred list check.

### Contractors

Contractors or employees of contractors working at the College should have the appropriate level of DBS check if a check is required, eg if the contractor is carrying out teaching or providing a level of care or supervision of children regularly.

### Documents and certificates

Please give details of any documentary evidence obtained as part of each check. Please note that there is no requirement to list DBS numbers. Also, to comply with the Data Protection, DBS certificates should not be retained any longer than six months. Other documents to verify identity, right to work in the UK etc, should be kept in personnel files.