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# **CHILD PROTECTION AND SAFEGUARDING POLICY**

**(including safer recruitment, allegations  
against staff and low-level concerns)**

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This document is based on guidance from Keeping Children Safe in Education (KCSIE) (2025 version) and Working Together to Safeguard Children 2023 and follows the Surrey County Council Model Policy.

If the Government re-issues this guidance during the 2025/2026 period, the Policy will be updated to ensure it is compliant with any changes.

Person(s) Responsible:	Mr J Cleary
Governors' Committee:	Full Governing Board
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# Safeguarding Statement 2025

## ‘Safeguarding is Everyone’s Business’

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

We make every effort to provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

The purpose of this policy is to provide staff, volunteers and Governors with the framework they need in order to keep children safe and secure at Collingwood College. The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

## Key Personnel

The Designated Safeguarding Lead (DSL) is Mr J Cleary  
Contact details: 01276 457600 [dsl@collingwood.surrey.sch.uk](mailto:dsl@collingwood.surrey.sch.uk)

Deputy DSL(s) are Mrs J Hawkemore, Mr P Jarmyn, Mrs N Akbar, Mrs R Woods and Mrs N Everson  
Contact details: 01276 457600 [dsl@collingwood.surrey.sch.uk](mailto:dsl@collingwood.surrey.sch.uk)

Other trained DSLs are Mrs C Chapman and Mrs N Woolven

The Governor responsible for Safeguarding is Mr S W Barker  
Contact details via the Clerk to the Governing Board [s.rutherford@collingwood.surrey.sch.uk](mailto:s.rutherford@collingwood.surrey.sch.uk)

The Principal is Miss K Watling  
Contact details: 01276 457600

The Chair of Governors is Mr S W Barker  
Contact details: [chair@collingwood.surrey.sch.uk](mailto:chair@collingwood.surrey.sch.uk)

Designated teacher for Looked After Children (LAC) is Mrs N Everson  
Contact details: 01276 457600 / [dsl@collingwood.surrey.sch.uk](mailto:dsl@collingwood.surrey.sch.uk)

Special Education Needs and Disabilities Coordinator (SENDCo) is Mrs J Hawkemore  
Contact details: 01276 457600

Designated teacher for young carers is Mrs L Evans  
Contact details: 01276 457600

## Terminology

Safeguarding and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge;
- Protecting children from abuse and maltreatment, whether that is within or outside the home, including online;
- Preventing impairment of children’s mental and physical health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children to have the best outcomes.

**Child Protection** is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

**Early help** is support for children of all ages that improves a family’s resilience and outcomes or reduces the chance of a problem getting worse.

The local safeguarding partnership has three partners:

1. Chief Executive of Surrey County Council (Children's Services)
2. Chief Executives of Surrey Heartland's and Frimley's Integrated Care Boards, and
3. The Chief Constable of Surrey Police

**Staff** refers to all those working for or on behalf of the College, full or part time, temporary or permanent, in either a paid or voluntary capacity. This includes, but is not limited to, employed staff, contractors, volunteers, Governors/Trustees, supply staff and self-employed staff.

**Child(ren)** includes everyone under the age of 18. On the whole, this will apply to students at the College; however, the policy will extend to visiting children and students from other establishments.

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

**Social Care** refers to Children's Services in the area in which the child is resident, unless a child is a Looked after Child (LAC) then this will be the Children's Services in their home authority.

**MAP** refers to the Surrey Multi-Agency Partnership.

**C-SPA** refers to the Children's Single Point of Access.

**DSL** where appropriate also refers to Deputy Designated Safeguarding Lead (DDSL).

**Statutory** means what has been decided or is controlled by law. **Statutory guidance** tells us what schools and local authorities must do to follow the law.

**Collingwood College** will publish its Child Protection and Safeguarding Policy on its website. Hard copies will be available on request from the College Reception.

## Children's Services

### Children's Single Point of Access (C-SPA)

Anyone can contact the C-SPA about a child, young person or parent/carer who needs support in Surrey. This could be a concern about how the child is developing, issues that the parent or carer is experiencing, or you suspect a child is being neglected or subjected to physical, sexual, or emotional abuse.

Surrey's Child Protection Consultation Line for advice and support (0300 470 9100 option 3).

If a child is in **immediate danger**, the police should be contacted on 999.

If it is not an emergency, but there is a concern that a child is at risk, C-SPA should be contacted by phone on 0300 470 9100 or 03311 435554.

Requests for support should be sent securely by email to [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) using the [Request for Support Form](#).

[Report child abuse to a local council – GOV.UK](#).

## Emergency Duty Team (EDT)

Emergency Duty Team (EDT) provides an emergency social care service for urgent situations which are out of normal office hours. If your call is not answered, please do leave a message and your contact details for someone to get back to you.

EDT is available **5pm-9am, Monday – Friday, Weekends 24 hours a day.**

**Phone: 01483 517898**

**Email: [edt.ssd@surreycc.gov.uk](mailto:edt.ssd@surreycc.gov.uk)**

## Local Authority Designated Officer (LADO)

Every local authority has a legal responsibility to appoint a LADO who is responsible for organising the response to concerns/allegations that an adult who works with children may have caused them or could cause them harm. They will be informed within one working day of any allegations that come to our attention. The LADO will give advice and guidance to employers, such as the Principal and the Chair of Governors to make sure that any allegation is dealt with fairly and quickly, ensuring that the child is protected effectively.

The LADO can be contacted by:

Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)

Telephone: 0300123 1650 option 3

Online: [LADO Referral Form](#)

## Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002 (as amended), 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).

All action taken by Collingwood College will be in accordance with statutory, national and local guidance.

This includes:

## The Law (legislation and statutory guidance)

In addition to Surrey Safeguarding Children Partnership's (SSCP) [arrangements](#), **Collingwood College** also follows the laws and statutory guidance below:

- [Working Together to Safeguard Children 2023](#) which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of schools.
- ['What to do if you are Worried a Child is Being Abused' 2015 - Advice for Practitioners](#)
- [Keeping Children Safe in Education \(KCSIE, 2025\)](#) is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.
- [Relationships and sex education \(RSE\) and health education - GOV.UK](#) This is statutory guidance from the Department for Education issued under Section 80A of the Education Act 2002 and section 403 of the Education Act 1996
- [Education Act 2002](#), section 175 places a duty on maintained schools and local authorities to keep children safe and promote their welfare.
- The [Children Act 1989](#) is the main source of child safety law for England and Wales. The Act gives the basis for most of children's services' duties and responsibilities towards children and their families. It also provides the legal framework for the child protection system. The [2004](#) amendment is used alongside the Act.
- The [Children Act 1989 Care Planning, Placement and Case Review](#) sets out what responsibilities education settings have for children looked after by the local authority.
- The [Human Rights Act 1998](#) sets out the core rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the [European Convention on Human Rights](#) (the Convention) that apply in the UK. Experiencing harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of these rights.

- The Equality Act 2010 states that schools and colleges must not unlawfully discriminate against children because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (called protected characteristics). Therefore, we can take positive action to deal with disadvantages affecting our children with protected characteristics to make sure their needs are met. The Equality Act 2010: advice for schools advises us further.
- The Public Sector Equality Duty (PSED) states that we have to be mindful of the need to eliminate unlawful discrimination, harassment and victimisation. Some children may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying, or racial discrimination. It is important to make sure we foster good relations between those who share a protected characteristic and those who do not, and work to make sure children have equal opportunities. We give specific attention to this duty when we write our policies or make any decisions about how our College is run.

More legislation is covered throughout this policy in their relevant sections. Some government guidance is not statutory - instead it supports practitioners, like school staff, in the decisions we make to keep children safe. Where possible, links to non-statutory guidance have been included in the relevant sections.

This policy should be read in conjunction with the following College policies (available on request):

- Recruitment and Selection Guidance Policy
- Whistleblowing Policy
- Staff Code of Conduct
- Management of Behaviour Policy
- E-Safety/Online Safety Procedure
- Attendance Policy
- Health, Safety and Welfare Policy
- Anti-Bullying Policy
- Attendance Policy
- Complaints Procedure
- Looked After Children (LAC) and Previously Looked After Children (PLAC) Policy
- Equity, Diversity and Inclusiveness Policy
- Special Educational Needs and Disabilities Policy
- Supporting Students with Medical Needs Policy
- Recruitment Privacy Notice

## Policy Aims

The aims of this Policy are:

- To provide staff with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the College and ensure that safeguarding follows a whole College approach.
- Clarifying safeguarding expectations for members of the College community, staff, Governing Board, children, and their families.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in the built on shared values; that children are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice, and are listened to.
- Supporting contextual safeguarding practice recognising that the College can be a location where harm can occur.
- Setting expectations to develop knowledge and skills within the College community (staff, students, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Working in partnership with children, parents/carers, and other agencies in the Surrey Safeguarding Children Partnership.

## Policy Principles and Values

- The welfare of the child is paramount.
- Maintain an attitude of “It could happen here”.
- Maintain a “zero-tolerance” approach to sexual violence and sexual harassment.
- Children have a right to feel safe and secure, they cannot learn effectively unless they do so.
- All children have a right to be protected from harm and abuse.
- All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the College or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.
- Whilst the College will work openly with parents/carers as far as possible, it reserves the right to contact social care or the police, without notifying parents/carers, if this is believed to be in the child’s best interests.
- We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach.

## Supporting Children

The College will support all children by:

- Providing a safe place and stability in the lives of children who have been abused or who are at risk of harm. The College recognises that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. Research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- Promoting a caring, safe and positive environment within the College.
- Encouraging self-esteem and self-assertiveness, through the curriculum and through positive relationships within the College community.
- Ensuring children are taught to understand and manage risk through Personal, Social, Health and Economic (PSHE) education and Relationship and Sex Education (RSE) and Health Education through all aspects of College life, including staying safe online.
- Responding sympathetically to any requests for time out to deal with distress and/or anxiety.
- Ensuring children are made aware of and have access to details of helplines, counselling, or other avenues of external support.
- Liaising and working in partnership with support services and agencies involved in early help and the safeguarding of children. This includes Early Help Referrals to Social Care.
- Notifying children’s social care without delay if there is an immediate risk of significant harm.
- Providing continued support to children about whom they have concerns and those who leave the College by ensuring that information is shared confidentially with the child’s new setting. The College will ensure records are forwarded as a matter of priority and within statutory timescale.

The DSL will consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

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

## The College will:

- Establish and maintain an ethos where students feel safe and secure, are encouraged to talk and are always listened to.
- Include regular consultations with students e.g. through questionnaires, participation in anti-bullying activity, asking children to report whether they feel safe in College.
- Ensure that all students know they can access a trained adult in the setting whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including PSHE opportunities which equip students with the skills they need to keep themselves and others safe, including online, and to know to whom they should turn to for help. It is also recognised that effective education will be tailored to the specific needs and vulnerabilities of individual students, including those who are victims of abuse, and children with special education needs or disabilities (SEND).
- Provide preventative education by creating a culture of zero tolerance for sexism, misogyny/Misandry, homophobia, biphobia and sexual violence and sexual harassment.
- Ensure all staff are aware of the College's guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

## Professional expectations, roles, and responsibilities

### Role of the College

The College will ensure that:

Details of the DSL and DDSL are available on the website, our newsletter, key offices and in reception areas.

The College operates safer recruitment procedures in line with KCSIE 2025 which includes statutory checks on the suitability of staff to work with children.

All staff receive information about the College safeguarding arrangements, the College's safeguarding statement, staff behaviour policy (code of conduct), Child Protection and Safeguarding Policy, the role and names of the Designated Safeguarding Lead (DSL) and their deputy Designated Safeguarding Leads (DDSL), and Keeping Children Safe In Education 2025 Part 1 or the condensed version of it in annex A. This applies to the Governing Board in relation to part 2 of the same guidance.

All staff receive safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction in line with advice from [SSCP](#). Training is regularly updated as required, and at least annually to continue to provide them with relevant skills and knowledge to safeguard children effectively.

All members of staff are trained in and receive regular updates in online safety and reporting concerns.

All members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment.

All staff and Governors have regular safeguarding and child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.

The Child Protection and Safeguarding Policy is made available via the College website and a paper copy is available upon request for parents/carers.

All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures.

A coordinated offer of early help when additional needs of children are identified is provided and contribute to early help arrangements and inter-agency working and plans.

The College's lettings policy will seek to ensure the suitability of adults working with children on the College site at any time and ensure that any groups who use the College's premises have Safeguarding and Child Protection policies and procedures in place.

Community users organising activities for children are aware of the College's Child Protection and Safeguarding Policy, guidelines and procedures.

The name of the designated members of staff for safeguarding and child protection, the DSL and DDSL(s), are clearly advertised in the College.

**Everyone at the College has a responsibility for safeguarding. Some members of the College have specific safeguarding responsibilities.**

### **All Staff will:**

Sign to say they have read and understood Part 1 of statutory guidance KCSIE (2025) annually. Those working directly with children will also read Annex B.

Have a responsibility to provide a safe environment in which children can learn.

Have a responsibility to establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.

Follow the College's procedures for identifying and reporting any concerns and issues about the College's online filtering and monitoring systems.

Follow the College's safeguarding and child protection processes and procedures, sharing information quickly when they have a concern about a child's safety and wellbeing, even when they are unsure.

Whenever necessary, refer safeguarding or child protection concerns to external agencies, such as the police, children's services and the LADO.

Attend safeguarding training appropriate to their role and are familiar with key policies, including this policy and the staff behaviour policy (code of conduct).

Create a culture where children who identify as lesbian, gay, bisexual, transgender (LGBT) or are gender questioning feel safe, can speak out and share concerns.

Be aware of indicators of abuse, neglect and exploitation understanding that children can be at risk of harm inside and outside of College, inside and outside of the home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.

What staff need to know is covered in the training section of this policy.

### **The Governing Board**

**All members of The Governing Board understand and fulfil their responsibilities to ensure that:**

Safeguarding, and the child's best interests, wishes and feelings, are considered in everything the College does. Everyone is involved in the whole College approach to safeguarding, and online safety is a theme throughout.

The College's policies, procedures and training follow the local safeguarding partnership arrangements and the law, including the College's duties under the Human Rights Act 1998, Data Protection Act 2018 and Equality Act 2010.

The College's leadership team are held to account for the College's safeguarding arrangements.

Safeguarding is a standing item on the agenda for Governing Board Committee meetings.

The appointed Designated Safeguarding Lead (DSL) is given the additional time, funding, training, resources and support needed to carry out the role effectively.

An experienced Governor takes leadership responsibility for the College's safeguarding arrangements.

There is an appointed designated teacher for Looked After Children (LAC) who is appropriately trained.

The Governing Board takes into account children who are more at risk of harm and any barriers that can make it difficult to recognise abuse and/or neglect, for example children with special educational needs and disabilities (SEND).

Safeguarding and Child Protection files are maintained, as set out in Annex C of KCSIE.

The College adds to multi-agency working and shares information appropriately and in a timely manner.

All staff receive regular safeguarding information, updates and in-depth training.

Staff sign to say they have read the appropriate part of KCSIE. Governors sign to say they have read and understood KCSIE guidance documents and this policy.

Children are taught about keeping safe, including when online.

The Governing Board does all that it reasonably can to limit children's exposure to online risks from the College's online IT systems and assign a member of the Senior Leadership Team (SLT) and a Governor to ensure standards are met.

Appropriate safer recruitment processes and procedures are in place.

Procedures are in place to identify and address children absent from education, including persistent absence, and when safeguarding concerns coincide.

There are procedures for reporting and managing safeguarding concerns about adults who work for the College. The Chair of Governors will manage any allegations against the Principal.

There are effective safeguarding arrangements for when the site is being hired/let.

All members of the Governing Board receive safeguarding training at induction, which is regularly updated.

The SSCP is informed in line with local requirements about the discharge of duties via the Biennial (s 157 s 175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via [PHEW](#) to Surrey County Council.

## **The Nominated Safeguarding Governor**

The nominated Safeguarding Governor meets with the DSL and visits the College regularly, asking questions that allow them to monitor how the College's safeguarding policies and procedures are being put into practice.

Each year they are part of the biennial safeguarding audit, led by the DSL and the Principal, and makes sure that it is submitted via PHEW.

The Safeguarding Link Governor is the Governing Board's safeguarding specialist, feeding back their findings following College visits and meetings with the DSL.

The Safeguarding Link Governor attends appropriate training that guides them in how to monitor and progress any areas of weakness in the College's safeguarding arrangements.

They keep up-to-date with the SSCP's safeguarding arrangements and guidance.

## The Principal:

In addition to the role and responsibilities of all staff, the Principal will ensure that:

This policy and other safeguarding related policies and procedures (such as the staff behaviour policies, Whistleblowing Policy) are shared at induction, understood by all staff, including temporary staff and volunteers, and are being followed at all times.

Staff receive safeguarding training that is updated regularly.

Parents and carers are aware of this policy and where they can access a copy.

The DSL is given the additional time, funding, training, resources, and support needed to carry out the role effectively and there is cover by an equivalently trained deputy if the DSL is absent.

Visitors are appropriately supervised or escorted, where necessary.

Systems are in place for children to express their views and give feedback, which are used to inform the whole College approach to safeguarding.

The Principal becomes the 'case manager' when an allegation is raised about a member of staff and makes the final decision regarding all low-level concerns.

Appropriate arrangements are put in place for the supervision of staff who have contact with children and families.

## The Designated Safeguarding Lead:

In addition to the role and responsibilities of all staff the DSL will:

Have the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL is a senior member of staff from the College's leadership team. Collingwood College has deputy DSLs to support the DSL in their role. While the DSL may hand over some activities to a deputy, the DSL will always have the ultimate responsibility for keeping children safe.

Assume the full responsibilities of the DSL and the deputy DSL(s) are listed in their job descriptions. The DSL's responsibilities include, but are not limited to:

- Reading and following KCSIE.
- Always being available during term time (during College hours) for staff to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the College leadership for any out of hours/out of term activities.
- Working together with all staff to understand the whole picture when there are safeguarding concerns, providing them with advice, support and expertise.
- Contributing to the assessment of children, including taking part and/or supporting staff to take part in strategy discussions, child protection conferences and meetings between multiple agencies.
- Working together with and supporting parents/carers and families who may be facing challenging circumstances and, when there are safeguarding concerns, making parents/carers aware of the College's role in making referrals about suspected abuse, neglect and exploitation.
- Understanding the importance of sharing information, including making appropriate referrals to relevant agencies (for example, children's services, the police, the Channel Programme and/or the Disclosure and Barring Service (DBS)) and supporting staff who make referrals directly.
- Understanding and following Surrey Safeguarding Children Partnership (SSCP) safeguarding procedures
- Having a secure working knowledge of SSCP procedures and understand the assessment process for providing early help and statutory intervention, in line with Surrey's Continuum of Need Indicators.
- Keeping the Principal up to date with safeguarding issues.
- Having the lead responsibility for online safety, including oversight and checking the effectiveness of the College's filtering and monitoring systems and their reports.
- Being aware of the requirement for children to have an Appropriate Adult, as described in PACE Code C 2019.

- Making sure child protection files are up to date and kept as per the record keeping section.
- Making sure that all staff have access to this policy (and the wider safeguarding procedures), the policy is available publicly and reviewed annually.
- Making sure that all adults who work in or for the College have an adequate and appropriate safeguarding induction, regularly updated safeguarding training and annually sign to say they have read the relevant part of KCSIE.
- Working alongside the Governing Board and the Principal to review and update procedures and how they are being implemented, including jointly completing and submitting the biennial (s157 s175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via PHEW to Surrey County Council.
- Promoting the educational outcomes of children who have or had a social worker, by sharing appropriate child protection information with the teacher and leaders.
- Encouraging a culture of listening to children, taking into account their wishes and feelings when any plans are put in place to protect them.

(Duties are further outlined in KCSIE (2025, Annex C)

## The Deputy Designated Safeguarding Lead(s):

In addition to the role and responsibilities of all staff the DDSL(s) will:

- Be trained to the same standard as the DSL and the role is explicit in their job description.
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
- In the absence of the DSL, carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the DDSL will assume all of the functions of the DSL.

## Confidentiality, Sharing and Withholding Information

Collingwood College takes its responsibility to protect and look after the data (information) it holds about children and its families seriously. The Data Protection Act (DPA) 2018 and General Data Protection Regulation (GDPR) guide the College in how to do so. Under the DPA 2018, the College will share information without consent if 'the safeguarding of children and individuals at risk' is its reason for doing so, and

- it is not possible to gain consent;
- it cannot be reasonably expected that a practitioner (for example, teacher) gains consent; or
- to gain consent would place a child at risk.

The Government's [information sharing advice for safeguarding practitioners](#) supports staff who have to make decisions about sharing information. Staff are aware they can look at the [data protection in schools toolkit](#) or speak to a member of the safeguarding team if they are unsure about sharing information. Government guidance emphasises that: "The Data Protection Act 2018 and GDPR do not prevent, or limit, 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 promote the welfare and protect the safety of children."

To keep children safe, the College will share information in a timely manner including sharing information with agencies and professionals in line with the Working Together to Safeguard Children 2023 guidance. The College respects that safeguarding matters are personal to families, so the DSL, Deputy DSLs and Principal will only share information about a child to members of staff and professionals on a need-to-know basis.

All staff are aware that they cannot make a promise to a child to keep secrets that might impact on the child's safety or wellbeing. Instead, staff should tell the child that they may need to pass information on to others who can help and protect them.

## Reporting and Responding to Safeguarding Concerns

The following procedures apply to all staff working at the College and will be covered in training to enable staff to understand their role and responsibility.

The aim of the procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a student is being harmed or abused or is at risk of harm, abuse or exploitation.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:

- Make an initial record of the information related to the concern as soon as possible on CPOMS.
- On CPOMS staff should detail all aspects of the disclosure including details of (should access to CPOMS not be immediate written notes should include):
  - Date
  - Time
  - Place
  - Who was present
  - Context
  - Details of disclosure/concern (using the student's words)
  - Demeanour/non-verbal behaviours of the student
  - Child's voice
  - Any injuries (using a body map to record these)
  - Rationale for decision making
  - Actions taken
- Report it to the DSL immediately either on CPOMS or ensure a DSL or Deputy are aware in person if there is immediate concern for safety.

The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.

The records must be signed and dated if written notes. CPOMS will automatically time and date stamp electronic communication.

In the absence of the DSL or DDSL, all staff must be prepared to and know how to refer directly to C-SPA (and the Police if appropriate) if there is the potential for immediate significant harm or contact the consultation line at the C-SPA for support and advice.

Following a report of concerns the DSL must, using the [Continuum of Needs of support for children](#) document decide whether or not there are sufficient grounds for suspecting harm, in which case a request for support must be made to the C-SPA and the Police if it is appropriate.

The College should try to discuss any concerns about a child's welfare with the parent/carer and where possible obtain their agreement before making a referral to the C-SPA. However, this should only be done when:

- it will not place the child at increased risk;
- sexual/organised abuse is suspected;
- the fabrication of an illness is suspected;
- the discussion could impede a Police investigation or Social Work enquiry.

Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or the Police whether the parents/carers should be told about the referral and, if so, when and by whom. This is important in cases where the Police may need to conduct a criminal investigation. The child's views should also be considered.

If it is suspected that a child is suffering, or is likely to suffer, harm or abuse the DSL must contact the C-SPA. If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA consultation line to discuss concerns.

When a child needs urgent medical attention and there is suspicion of abuse the DSL, or a member of the DSL team, should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the C-SPA will take and about informing the parents/carers, remembering that parents/carers should normally be informed that a child requires urgent hospital attention.

The exception to this process will be **in those cases of known FGM** where there is a [mandatory reporting duty](#) for the teacher to report directly to the Police where they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.

The DSL should also be made aware in this instance.

## Staff response to children

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child and/or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable. All staff have the right to make a referral to the C-SPA or Police directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on the College premises at the time and have concerns about sending a child home.

### Guiding principles:

- Receive or Recognise
- Reassure
- Respond
- Report
- Record
- Remember
- Refer if applicable
- Review (by the DSL)

### What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information, they should seek it out.

If they believe that the concern has not been acted upon appropriately, they should inform the Principal or Safeguarding Governor or contact the C-SPA for advice.

## Safeguarding Concerns and Allegations made about Staff, including supply teachers, volunteers and contractors

[Surrey's LADO procedure](#) will be followed where it is alleged that anyone working in the College that provides education for children under 18 years of age, including supply staff, volunteers and contractors or another adult who works with children has:

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

The last bullet point above includes behaviour that may have happened outside of the College, that might make an individual unsuitable to work with children; this is known as transferable risk.

The College may also receive an allegation relating to an incident that happened when an individual or organisation was using the site for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities).

In dealing with allegations or concerns against an adult, staff must without delay:

Report any concerns to the Principal immediately.

If an allegation is made against the Principal, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly.

There may be situations when the Principal or Chair of Governors will want to involve the Police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

Once an allegation has been received by the Principal or Chair of Governors, they will contact the LADO (as part of their mandatory duty) on 0300123 1650 option 3 LADO or Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk) immediately and before taking any action or investigation.

Following consultation with the LADO, inform the parents/carers of the allegation unless there is a good reason not to.

In liaison with the LADO, the College will determine how to proceed and if necessary, the LADO will refer the matter to Social Care and/or the Police.

If the matter is investigated internally, the LADO will advise the College to seek guidance in following procedures set out in part 4 of KCSIE (2024) and the SSCP procedures.

### Low-level concerns

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

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

The purpose of reporting low-level concerns is to create and embed a culture of openness, trust and transparency in which the College's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

The College creates an environment where staff are encouraged, and feel confident, to self-refer where they have found themselves in a situation.

Reports should be made to the DSL in a timely manner. If the DSL has any doubt as to whether the information which has been shared about the individual as a low-level concern in fact meets the harm threshold, they will consult with the LADO.

Useful links:

[Surrey Safeguarding Children Partnership Procedures Manual Allegations Against Staff or Volunteers](#)

[Surrey Safeguarding Children Partnership Procedures Manual Non-recent Abuse Policy](#)

## What is child abuse?

The following definitions are taken from Working Together to Safeguard Children (2023). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour-based violence, forced marriage or female genital mutilation. To support the local context, all staff have access to Surrey's [Continuum of Needs Matrix](#).

### Forms of abuse and neglect

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

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

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

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

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The College uses the following guidance to help identify and address cases of neglect.

Abuse & Neglect - Surrey Safeguarding Children Partnership

Graded Care Profile 2

Surrey Neglect Screening Tool

Surrey Safeguarding Children Partnership Procedures Manual Recognising Abuse and Neglect

Handling Cases of Affluent Neglect in Schools

## Indicators of abuse

The following list, provided by the [NSPCC](#), covers some common indicators of abuse and neglect.

- unexplained changes in behaviour or personality;
- becoming withdrawn;
- seeming anxious;
- becoming uncharacteristically aggressive;
- lacks social skills and has few friends, if any;
- poor bond or relationship with a parent;
- knowledge of adult issues inappropriate for their age;
- running away or going missing;
- always choosing to wear clothes which completely cover their body;
- patterns of repeated lateness or absence.

**It is important that staff report all of their concerns, however minor or insignificant.**

## Sexual Violence and Sexual Harassment Between Children in the College

### Child-on-Child Abuse

We recognise that children can abuse other children, often referred to as child-on-child abuse. It can happen inside and outside College and online. This can include, but is not limited to:

- bullying (including online bullying, prejudice-based and discriminatory bullying);
- abuse between children in an intimate relationship;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (including when a child encourages or threatens physical abuse online);
- sexual violence, such as rape and sexual assault (including when a child encourages or threatens this online);
- sexual harassment, such as sexual comments, jokes and online sexual harassment;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting and initiation/hazing type violence and rituals.

Older children may use any type of child-on-child abuse to 'recruit' younger children into gangs, especially in areas where gangs are prevalent. Young people experiencing child sexual exploitation first hand may be forced to 'recruit' other young people using types of child-on-child abuse. We are aware that boys are more likely to carry out child-on-child abuse and girls are more likely to be impacted by it, but all child-on-child abuse is unacceptable and will be taken seriously.

Collingwood College does not tolerate child-on-child abuse. We know that even when there are no reported cases, it could still be happening, but has yet to be reported. We do not downplay child-on-child abuse, especially sexual violence and sexual harassment, as "banter", "just having a laugh", "part of growing up" or "boys being boys". For children to feel safe at College, we make sure they know child-on-child abuse is not acceptable behaviour and how to report it to a trusted adult if they are experiencing or witnessing it.

It is our duty to minimise the risk of child-on-child abuse. We do this in the following ways:

- Our staff read this policy.

- Our staff are trained to spot the signs that a child is, or may be experiencing, child-on-child abuse and how to report it. They maintain an attitude that 'it could happen here'.
- Our staff challenge any inappropriate behaviour between children, including the use of derogatory language.
- The behaviour policy, which includes our whole College response to abuse, makes sure everyone knows how to behave and how to respond consistently when children show unacceptable or abusive behaviour.
- In all areas of College life, such as lessons, assemblies and in the playground, we teach children how to act and to treat other people, including when they are online.
- We have effective systems in place for children to report child-on-child incidents.

## Child-on-child sexual violence and sexual harassment

Collingwood College is aware of Ofsted's [Review of sexual abuse in schools and colleges](#). The review was carried out as a result of the large amount of testimonies shared on the [Everyone's Invited](#) website, which highlighted the prevalence of sexual harassment and sexual violence.

We know that sexual violence and sexual harassment can happen between two children of any age or sex, from a group of children to a single child or group of children, online and face to face. It is more likely that girls will be impacted by sexual violence and more likely that sexual harassment will be instigated by boys. Sexual violence and sexual harassment exist on a continuum and may overlap. They are never acceptable, and we will not tolerate them. National and local research has made us aware of the prevalence and normalisation of harassment and abuse in school-aged children. No reports does not mean it is not happening at Collingwood College.

Alongside girls, these groups are at higher risk of sexual violence and sexual harassment:

- children with SEND.
- children who are LGBT+ or who are perceived to be LGBT+ by their peers.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, negatively affect their educational attainment and be worsened if the alleged perpetrator(s) attends the same school. If a child reports an incident, they will be reassured that they have done the right thing by telling a trusted adult, will be taken seriously, supported and kept safe. We will further reassure those affected that the law is there to protect them, not criminalise them.

We are aware that when a child reports sexual violence or harassment, this may only be the start of a larger disclosure that could transpire over time. When there are reports, we will always consider the effectiveness of our policies and procedures and whether any changes are necessary to reduce the risk of it happening again. This will be in line with the College maintaining a culture of safeguarding. Collingwood College follows Part 5 of KCSIE when considering its response to sexual violence and sexual harassment. These are mainly captured in the [child-on-child abuse section](#) of this policy.

## Harmful Sexual Behaviour (HSB)

Children's sexual behaviours exist on a continuum. HSB refers to problematic, abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. HSB can occur online or face-to-face. We will always consider HSB in a child protection context. Collingwood College recognises that children displaying harmful sexual behaviours have often experienced their own abuse and trauma and they will be offered appropriate support.

When considering HSB, we will take into account the ages and the stages of development of the children. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Our DSL and deputy will:

- have a good understanding of HSB.
- assist in planning the curriculum aimed at preventing HSB.

- ensure staff spot and report inappropriate behaviour to prevent an escalation.
- incorporate our approach to sexual violence and sexual harassment into the whole College approach to safeguarding.

Collingwood College's curriculum addresses these issues via the following topics according to the age and stage of development of our children:

- healthy and respectful relationships
- what respectful behaviour looks like
- gender roles, stereotyping, equality
- body confidence and self-esteem
- consent

Useful links:

[Surrey Safeguarding Children Partnership Procedures Manual- Harmful Sexual Behaviour](#)

[NSPCC Harmful Sexual Behaviours](#)

[Stop it Now](#)

[Shore Space](#)

## Upskirting

The College will ensure that all staff and children are aware that 'upskirting' is a criminal offence and will not be tolerated. The Criminal Prosecution Service (CPS) defines 'upskirting' as: "a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission".

The College will decide each incident on a case-by-case basis, with the DSL or a deputy taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police, as required.

## Prevention of sexual harassment/violence and HSB

- Taking a whole College approach to safeguarding and child protection.
- Providing training to staff.
- Providing a clear set of values and standards, underpinned by the College's Management of Behaviour Policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum.
- Providing the students with the capacity to report electronically as well as in person via the College's ReportIt@ email.
- Engaging with specialist support and interventions.
- Responding robustly to reports of sexual violence and sexual harassment.

Children making any report of sexual violence or sexual harassment including "upskirting" (The Voyeurism Offences Act 2019) will be taken seriously, kept safe and be well supported.

If the report includes an online element staff will be mindful of the [Searching, screening and confiscation at school](#) guidance.

The key consideration is for staff not to view or forward illegal images of a child. The guidance provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

## Sharing nudes and semi-nudes

This is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18 ([UKCIS, 2024](#)). It is a form of child sexual abuse. All incidents will be dealt with as

safeguarding concerns. The primary concern at all times will be the welfare and protection of the children involved. While sharing nudes and semi-nudes of themselves or their peers breaks the law, we know it is important to avoid criminalising young people unnecessarily.

Children might share nudes because of threats and/or pressures from relationships. They might also want to send nudes, but this is usually because they believe they will get something in return. Sextortion is when someone threatens to share or distribute nude or semi-nude images of another person if they don't do what is asked. It can happen to anybody, but a large amount of cases involve teenage boys. The explicit imagery may be used to blackmail the young person into sending more images, money, or in some cases, into recruiting more victims. Images can be both real or generated by artificial intelligence.

We are aware of the [alert guidance](#) and support provided by the National Crime Agency and CEOP, and will use it to respond to incidents.

**In dealing with allegations of child on child abuse, staff will follow the [Reporting and Responding to safeguarding protocols](#).**

## Responding to allegations of sexual harassment and sexual violence

Using the DSL's or a deputy's professional judgement, the College will make decisions about and address the incident based on the Brook Sexualised Behaviour Resource kit. We will request the support of other agencies, such as children's services and the police, if necessary.

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB will be considered in a child protection context.

The College's response to HSB:

The [Brook Traffic Light Tool](#) uses a traffic light system to categorise the sexual behaviours of children, it can be used to help professionals and key staff are aware, have been trained in its use and use the tool. It helps:

- Make decisions about safeguarding children and young people
- Assess and respond appropriately to sexual behaviour in children and young people
- Understand healthy sexual development and distinguish it from harmful behaviour

By categorising sexual behaviours, the College can work with other agencies to the same standardised criteria when making decisions and can protect children with a multi-agency approach.

The College recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

The College follows the local safeguarding arrangements below when an allegation of sexual violence and/or sexual harassment has been made from a range of responses guided by the Brook toolkit including:

1. Managing internally using the behaviour policy and pastoral support.
2. Early help response used for non-violent harmful sexual behaviour to prevent escalation.
3. Referral to children's services when a child has been harmed, is at risk of harm or in immediate danger.
4. Reporting to the police if a crime has been committed, such as rape, assault by penetration or sexual assault, following the [When to call the police](#) guidance.

The management of children with sexually harmful behaviour is complex. Collingwood College will work with other relevant agencies to maintain the safety of the whole College community. Where appropriate, immediate measures will be put in place to support and protect the person impacted by the behaviours, any witnesses and the alleged instigator of the behaviours. A written record will be made, and next steps discussed taking into account the views of those impacted by the behaviour.

A risk and needs assessment will be completed for all reports of sexual violence and on a case-by-case basis for reports of sexual harassment. The assessment, which will be kept under review, will consider:

- Whether there may have been other people impacted by the behaviour.
- The person known to be impacted by the behaviour, especially their protection and support.
- The alleged instigator of the behaviour.
- All children (and, if appropriate, staff) at the college, especially any actions that are appropriate to protect them from the alleged instigator or future harm.
- The time and location of the incident and any action that can make the College safer.

## Unsubstantiated, unfounded, false or malicious reports

If a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help, or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's services may be appropriate. If a report is shown to be deliberately invented or malicious, the College will consider whether any disciplinary action is appropriate according to the behaviour policy.

## If a child who has experienced sexual violence or sexual harassment asks the College not to make a referral

If the child does not give consent to share information, the DSL or a deputy will balance the victim's wishes against their duty to protect them and other children on a case-by-case basis. If a child is at risk of harm, is in immediate danger or has been harmed, a referral should be made to children's services, and as rape, assault by penetration or sexual assault are crimes, reports should be referred to the police. As stated above, a police referral will still be made for children under the age of criminal responsibility.

We will do all we reasonably can to protect the anonymity of any children involved in any report, including weighing up what staff need to know and any support that will be put in place. Further, we will take into account the potential impact of social media in facilitating the spreading of rumours and exposing the child's identity.

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, our DSL and a deputy will be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. They will be guided by the [CPS: Safeguarding Children as Victims and Witnesses](#) advice.

## Physical Abuse

While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from children to children can also be abusive.

These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the Police.

The principles from the Anti-Bullying Policy will be applied in these cases, with recognition that any Police investigation will need to take priority.

## Anti-Bullying/Cyberbullying

The College's policy on anti-bullying includes measures to prevent bullying (including cyberbullying, prejudice-bases and discriminatory bullying).

The College keeps a record of known bullying incidents which is shared with and analysed by the Senior Leadership team (SLT) and the Governing Board. All staff are aware that children with SEND and/or children who identify as Lesbian, Gay, Bisexual, Transgender, Queer or Questioning (LGBTQ+), those from minority ethnic backgrounds, children open to children's services and children from low-income families are more susceptible to being bullied/victims of child abuse.

Risks can be compounded where children who have additional vulnerabilities lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Useful links:

[Surrey Safeguarding Children Partnership Procedures Manual Bullying](#)

[Behaviour in schools](#) (advice for schools, including advice for appropriate behaviour between pupils)

[Relationships Education, Relationships and Sex Education and Health Education guidance](#)

[Preventing bullying - GOV.UK](#)

[Guidance for schools on colleges on gender questioning children](#) (currently in draft, to be finalised)

## E Safety/Cybercrime

This section summarises our whole College approach to online safety and the use of smart devices (e.g. mobile phones, smart watches, tablets etc). Our detailed approach is covered in our E-Safety and Online Safety Policy which understands the significant and essential role that we have in making sure children are protected from potentially harmful and inappropriate online material. We consider online safety in every aspect of College life.

Our aim is to:

- Have in place online safety processes that protect our children and staff including how we identify, intervene in and escalate online concerns, where appropriate.
- Make sure technology is used responsibly and safely through education.
- Set clear expectations for the use of mobile phones and smart technology.

We fulfil our aims by:

- Ensuring appropriate filtering and monitoring systems are in place on the College's network and devices.
- Educating children to learn how to keep themselves safe when online (using the government's [Teaching online safety in schools](#) guidance), what to do if they are harmed or spot a risk and what the consequences are if they break the College rules about online safety.
- Engaging with parents and carers about what online safety looks like and host regular at least annual online safety parent education events.
- Making sure our whole College approach is reflected in all relevant policies.
- Regularly training staff on online safeguarding risks and how to be online safely.
- Making sure children, staff, parents/carers, Governors and volunteers sign an understandable acceptable use agreement that covers how they should use the school's IT systems and their mobile and smart technology.
- Making parents, carers, children and staff aware that staff can search an electronic device they have confiscated. See [Searching, Screening and Confiscation](#).

Due to the constant changes to online technology and the related harms, we will carry out an annual review and risk assessment of our online safety policies, procedures and systems.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk, content, contact, conduct and commerce.

### The 4Cs

Being online can be a great source of fun, entertainment, communication and education. Some people's online behaviour places others at risk. The number of issues covered under online safety is large and constantly growing. They are categorised into these four areas of risk:

**Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism misinformation, disinformation (including fake news) and conspiracy theories.

**Contact:** being subjected to harmful online interaction with other users, for example peer to peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit children for sexual, criminal, financial or other purposes.

**Conduct:** online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).

**Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If children or members of staff report any issues, we will report it to the Anti-Phishing Working Group (<https://apwg.org/>).

## Mobile phones and smart technology (including smart watches)

Many children have unlimited and unrestricted access to the internet via mobile phone networks; therefore children could be harmed or harm others online when at College. This may include sexually harassing, bullying and sharing indecent images (often via large chat groups). To protect children from these risks while they are at College, our approach to mobile and smart technology is to prohibit the use of mobile phones and other smart technology with similar functionality to mobile phones (for example the ability to send and/or receive notifications or messages via mobile phone networks or the ability to record audio and/or video) throughout the College day, including during lessons, the time between lessons, breaktimes and lunchtime. Students are not therefore permitted to use their phone from the first bell in the morning at 8.25 am until 3.05 pm once students have exited the buildings, unless instructed to use it by a member of staff or permission has been given for its use. This can be explored in greater detail in the College's Mobile Phone and Electronic Devices Policy.

## Media recordings, audio, image and video (including digital files)

When we make media recordings on College devices of children, such as taking videos or photos, we will get the child's and their parents'/carers' consent, make sure the child is appropriately dressed and encourage the child to tell us if they are worried about any media that has been taken of them. *Refer to our staff code of conduct and online safety policy, which cover our school's expectations for staff making media recordings.*

College CCTV footage is restricted to being viewed by only certain staff members and footage in sensitive areas of the College (e.g. washrooms) has even greater restricted access to senior DSL personnel.

## Filtering and monitoring

To limit children's exposure to online risks from the College's IT systems, we have strong and effective filtering and monitoring systems, following the government's [Meeting digital and technology standards in schools and colleges](#) guidance. We will also follow the government's [Plan technology for your school](#) guidance to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them. We will make sure that:

- Specific staff have assigned roles and responsibilities to manage systems.
- Staff know about the systems in place and how to escalate concerns.
- There are annual reviews of the systems, or more frequently if there is a significant change or issue.
- Our Governing Board reviews the systems with the DSL, IT staff and service providers, to find out what more can be done to keep children safe.
- The systems are effective for the age range of children and consider children potentially at greater risk of harm.
- When we block online content, it does not impact teaching and learning.
- Filtering works across all devices including mobile devices and smart technology.

## Remote education

If our students are being taught remotely e.g. at home, we will be in regular contact with parents and carers. We will make sure parents and carers are aware of:

- What their child/ren are being asked to do online, including the sites they will be accessing and who from the College will interact with their child/ren.
- The importance of children being safe online and offering advice on how to do so.
- What systems the College uses to filter and monitor online use.

## Information security and access systems

We have procedures in place to protect our IT systems and staff and learners from cybercrime, i.e. when criminals seek to exploit human or security vulnerabilities online to steal passwords, data or money directly. We will follow the government's [Cyber security standards for schools and colleges guidance](#) which were developed to help us improve our resilience against cyber-attacks. Our procedures and systems are reviewed regularly to keep up with the constant changes to cyber-crime technologies.

Children are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The College's online safety co-ordinator is the DSL.

The College will follow the guidance around [harmful online challenges and online hoaxes](#) when supporting children and sharing information with parents/carers.

Children with particular skills 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 DSL will consider a referral into the [Cyber Choices](#) programme.

This programme 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.

Useful links:

[Childnet International](#)

[Safer Internet Centre webpages](#)

[Generative AI: product safety expectations](#)

## Contextual Safeguarding

Contextual safeguarding, also known as 'risk outside the home', is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

The College will maintain records of concerns about contextual safeguarding in accordance with its safeguarding procedures. We know the importance of information sharing, therefore if we identify contextual safeguarding concerns about the local area we will share this information with relevant partners. If there is a specific concern about a child, we will consult with children's services.

Useful links:

[Tackling child Exploitation multi-agency Practice Principles](#)

[Contextual Safeguarding Network webpages](#)

## Racist Incidents

Our policy on racist incidents is set out separately and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

## Radicalisation, Extremism and Terrorism

[The Prevent Duty for England and Wales \(2023\)](#) under section 26 of the Counter Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

While some children are more susceptible, any child can be radicalised into terrorism. The College takes its statutory duty to prevent children from becoming terrorists or supporting terrorism seriously.

**Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence. It can occur over a period of time or quickly.

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

**Terrorism** is an action that:

- endangers or causes serious violence to a person/people
- causes serious damage to property, or
- seriously interferes or disrupts an electronic system.

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

To prevent children from being radicalised into terrorism, we make sure:

- Our filtering and monitoring systems will prevent and protect children from accessing extremist material.
- Children are taught about British Values and staying safe online via the curriculum.
- Children are provided with a safe space to discuss controversial issues and the skills they need to challenge extremist views.
- Staff are trained to spot the indicators of radicalisation and extremism and how to report concerns as soon as possible.
- The DSL attends Prevent awareness training and is aware of the latest guidance.
- We perform a risk assessment assessing how our learners or staff may be at risk of being radicalised into terrorism (including online) using the counter terrorism local profile and updates from the local partnership.

The [Educate against hate](#) government website lists signs that could indicate that a child is being radicalised:

- becoming increasingly argumentative;
- refusing to listen to different points of view;
- unwilling to engage with children who are different;
- becoming abusive to children who are different;
- embracing conspiracy theories;
- feeling persecuted;
- changing friends and appearance;
- distancing themselves from old friends;
- no longer doing things they used to enjoy;
- converting to a new religion;
- being secretive and reluctant to discuss their whereabouts;
- changing online identity;
- having more than one online identity;
- spending a lot of time online or on the phone;
- accessing extremist online content;
- joining or trying to join an extremist organisation.

**If you have concerns that a child may be at risk of radicalisation or involvement in terrorism, go to Concerns about extremism and radicalisation section of this policy.**

Useful links:

[Crime - Surrey Safeguarding Children Partnership](#)

[Prevent | Healthy Surrey](#)

[For Professionals - Prevent and Channel | Healthy Surrey](#)

[Protecting children from radicalisation: the prevent duty](#)

[Advice For Families | Counter Terrorism Policing](#)

If you have a concern that a child may be at risk of radicalisation or involvement in terrorism and they are in **immediate danger**, contact the police on 999. If the child is not in immediate danger, speak with the DSL or a deputy as a first point of call.

**The DSL** may decide to discuss their concerns with children's services and will make referrals to the police Prevent team and/or the Channel programme, where necessary. The DSL will need to seek the individual's consent when referring to the Channel programme.

**Prevent referral form** to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) . (email address solely for prevent referrals and not general enquires).

In cases where further advice from the Police is sought dial 101 or 07795 043842 or 01865 555618 and ask to speak to the Prevent Supervisor for Surrey.

Prevent leads:

Claire McDonald, Prevent Supervisor, Surrey Police:  
[claire.mcdonald@surrey.police.uk](mailto:claire.mcdonald@surrey.police.uk) - 07795 043842

Lara Bowden, Project Officer, Surrey County Council:  
[lara.bowden@surreycc.gov.uk](mailto:lara.bowden@surreycc.gov.uk)

Helene Morris - DfE Regional Prevent Co-ordinator for Southeast - Counter- Extremism. Department for Education Prevent Coordinator for South-East [Prevent.SouthEast@service.education.gov.uk](mailto:Prevent.SouthEast@service.education.gov.uk)

National Prevent referral form (healthysurrey.org.uk)

**Staff and Governors** can also raise concerns by emailing [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk), but this is not to be used in emergency situations. If you believe you have information relating to terrorism, you can call the anti-terrorist hotline on 0800 789 321. To report extremism in education, including allegations against staff and institutions, use this link.

Further information and a list of such indicators can be found at [Managing Risk of Radicalisation in your Education Setting](#)

## Domestic Abuse

Domestic abuse can include a wide range of behaviours and may be a single or pattern of incidents. This form of abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional, and includes coercive or controlling behaviour. It can take place inside and outside the home. The Domestic Abuse Act 2021 states that children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

These experiences can have a serious and long-term impact on a child's health, well-being, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. The Act states that domestic abuse occurs between at least two people over the age

of 16. Therefore, legally, some older children can also commit domestic abuse either in their own intimate relationships or against their parents/carers.

Collingwood College has signed up to the police initiative [Operation Encompass](#), a scheme between Surrey Police, Surrey Domestic Abuse Service and Surrey schools. The system ensures that when the 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 DSL at the College before the child or children arrive at 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.

Useful links:

[Surrey Safeguarding Children Partnership Procedures Manual - Domestic Abuse](#)

[Homepage - Surrey Safeguarding Children Partnership](#)

[Surrey Against Domestic Abuse Strategy 2024-2029 | Healthy Surrey](#)

[Multi agency risk assessment conferences | Healthy Surrey](#)

[Request information under Clare's Law: Make a Domestic Violence Disclosure Scheme \(DVDS\) application | Metropolitan Police](#)

[NSPCC-UK domestic abuse Signs Symptoms Effects](#)

[Refuge what is domestic abuse/effects of domestic abuse on children](#)

[Safe Young Lives | Young people & domestic abuse - SafeLives](#)

[Domestic abuse: specialist sources of support - GOV.UK](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)

## Homelessness

Collingwood College recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL is aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include: household debt, including new poverty induced by the pandemic; rent arrears; domestic abuse and antisocial behaviour; and/or the family being asked to leave a property. If a child has been harmed or is at risk of harm, a referral to children's social care will be made.

Useful links:

[Homelessness Reduction Act Factsheets - GOV.UK](#)

## Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Both can occur online. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation. Where this is the case, it is important that the child perpetrator is also recognised as a victim. Our staff will be aware of a range of factors that could make a child more vulnerable to exploitation. We will provide additional support to children who have been exploited to help keep them in education.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse alcohol and other drugs;

- go missing for periods of time or regularly come home late;
- regularly miss school or education or do not take part in education.

## Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse which can affect any child. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example believing they are in a genuine romantic relationship.

CSE can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends;
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development;
- become pregnant.

See the Sharing nudes and semi-nudes section below for details about 'sextortion'.

## Child Criminal Exploitation (CCE)

At Collingwood College we recognise children involved in CCE are victims, despite their engagement in crime. A child may have been criminally exploited even if the activity appears to be consensual. Staff will be aware that girls are at risk of criminal exploitation too, and that both boys and girls who are being criminally exploited may be at higher risk of sexual exploitation.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. CCE can include children being forced and/or manipulated:

- to work in cannabis factories;
- into moving drugs or money across the country (county lines);
- to shoplift or pickpocket;
- to threaten serious violence to others;
- into committing vehicle crime.

Useful links:

[Surrey Safeguarding Children Partnership Procedures Manual Child Sexual Exploitation](#)

[Surrey Safeguarding Children Partnership Procedures Manual Child Sexual Abuse in the Family Environment](#)

[Surrey Safeguarding Children Partnership Procedures Manual Child Criminal Exploitation](#)

[Crime - Surrey Safeguarding Children Partnership](#)

[Child sexual exploitation - Surrey County Council](#)

[Child sexual exploitation | Surrey Police](#)

[CEOP Safety Centre](#)

[Home | CSA Centre](#)

[Centre of expertise on child sexual abuse](#)

[Preventing Child Sexual Exploitation](#)

[Lucy Faithfull Foundation webpages](#)

[Child sexual exploitation: definition and guide for practitioners](#)

## Serious Violence

Staff at Collingwood College will be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime.

These may include:

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

All staff are aware of the range of risk factors increasing the likelihood of involvement in serious violence, such as:

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

Being the victim of, carrying out or allegedly carrying out serious violence (e.g. knife crime) may indicate that a child is involved in county lines.

Useful links:

[Homepage - Surrey Safeguarding Children Partnership](#)

[Crime - Surrey Safeguarding Children Partnership](#)

[Preventing youth violence and gang involvement government guidance](#)

[Criminal exploitation of children and vulnerable adults: county lines government guidance](#)

[Child exploitation | Catch22](#)

[Keeping kids safe - Children's Commissioner for England | Children's Commissioner for England](#)

## Mental health

With mental health problems, a child might find the ways they are frequently thinking, feeling or reacting becoming difficult, or even impossible, to cope with. Mental health problems affect around 1 in 6 children. The College recognises that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are trained to recognise the signs of a child who may be experiencing a mental health problem. **Collingwood College** aims to promote positive mental health for all staff and children. To do so, we take into account the government's [Mental health and behaviour in schools guidance](#).

Our mental health leads are Ms N Akbar and Ms L Collins, but key pastoral staff are trained to deal with ill mental health and also suicide prevention.

## Modern Slavery

Modern slavery is a crime whereby a person uses another person, by means of deception or coercion, as a possession for the purposes of exploitation. We are aware modern slavery exists in the UK and that some victims are children.

Common places modern slavery occurs include:

- The sex industry, including brothels.
- Retail: nail bars, hand car washes.
- Factories: food packing.
- Hospitality: fast-food outlets.
- Agriculture: fruit picking.
- Domestic labour: cooking, cleaning and childminding.

Victims can be forced into criminal activities such as cannabis production, theft or begging.

The DSL will seek advice and support from children's services who may in turn make a referral to the National Crime Agency via the National Referral Mechanism (NRM). Further advice can be provided directly by the modern slavery helpline on 0800 012 1700.

Useful links:

[Crime - Surrey Safeguarding Children Partnership](#)

[Modern slavery - GOV.UK](#)

[Modern slavery: how to identify and support victims](#)

[Behind the Behaviour: Identifying the criminal exploitation of migrant children | ECPAT UK](#)

[Protecting children from trafficking and modern slavery | NSPCC Learning](#)

[Surrey Safeguarding Children Partnership Procedures Manual Children from Abroad, including Victims of Modern Slavery, Trafficking and Exploitation](#)

## Child abuse linked to faith or belief

This type of abuse can happen anywhere across any community and/or religion. There are a variety of definitions associated with abuse linked to faith or belief. It can include, but is not limited to, the concept of belief in:

- Witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs).
- The evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context).
- Ritual or multi-murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies.
- use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation.

If you suspect a case of child abuse linked to faith or belief, follow the safeguarding procedures in this policy. In addition, the Metropolitan Police's Project Violet team can be contacted on the non-emergency, 24/7 number: 101.

Useful links:

[Child abuse linked to faith or belief | Surrey Police](#)

[Short Youtube introduction video](#)

## So-called 'Honour'-based abuse (HBA)

HBA can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

HBA might be committed against people who:

- Become involved with a boyfriend or girlfriend from a different culture or religion.
- Want to get out of an arranged marriage; become involved with a boyfriend or girlfriend from a different culture or religion.
- Want to get out of an arranged marriage.
- Want to get out of a forced marriage.
- Wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

### One Chance Rule

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBA. Staff should recognise they may only have one chance' to speak to a child who is a potential victim and have just one chance to save a life.

The College is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

## Female Genital Mutilation (FGM)

FGM is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. [A mandatory reporting duty](#), requires teachers to report directly and immediately to the Police 101.

Female genital mutilation (FGM) means all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It has long-lasting harmful consequences. The DSL will make sure that staff have appropriate training to prepare them for spotting signs that a child has been affected by FGM or is at risk of FGM.

**What to do if you have concerns about a child's welfare section of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM has been carried out or suspects that a child is at risk of FGM.**

Signs that FGM might happen:

- A relative or someone known as a 'cutter' visiting from abroad.
- A special occasion or ceremony takes place where a girl 'becomes a woman' or is 'prepared for marriage'.
- A female relative, like a mother, sister or aunt has undergone FGM.
- A family arranges a long holiday overseas or visits a family abroad during the summer holidays.
- A girl has an unexpected or long absence from College.
- A girl struggles to keep up in College.
- A girl runs away – or plans to run away - from home ([NSPCC](#)).

Signs FGM might have taken place:

- having difficulty walking, standing or sitting;
- spending longer in the bathroom or toilet;
- appearing quiet, anxious or depressed;
- acting differently after an absence from College;
- reluctance to go to the doctors or have routine medical examinations;

- asking for help – though they might not be explicit about the problem because they're scared or embarrassed ([NSPCC](#)).

Useful information:

[Female Genital Mutilation Statutory Guidance](#)

[Surrey Safeguarding Children Partnership Procedures Manual Female Genital Mutilation](#)

**There are no circumstances in which a member of staff should examine a girl.**

## Forced Marriage

A forced marriage is non-consensual. Either person could be forced/pressured in several ways, including physically, psychologically, financially, sexually and emotionally. It is a criminal offence in England and Wales. An arranged marriage is different. The families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement remains with those who are considered for marriage.

We are aware that the legal age for marriage in the UK has risen to 18, regardless of parental consent. The DSL will follow the local safeguarding procedure and, if necessary, seek advice from the Forced Marriage Unit on 020 7008 0151 if a concern comes to their attention.

Useful information:

[Freedom charity](#)

[Handling cases of forced marriage guidance](#)

[National FGM Centre](#)

[Forced marriage](#)

[Karma Nirvana](#)

## Fabricated or induced illnesses

Staff at Collingwood College are alert to the issues surrounding fabricated or induced illnesses.

Fabricated or induced illness (FII) is a rare form of child abuse. It happens when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child. Our supporting children with medical needs policy details our procedure for ensuring reported medical needs are evidenced by medical professionals.

Useful link:

[The Royal College of Paediatrics and Child Health \(RCPCH\) guidance](#)

## Private Fostering Arrangements

**Definition:** A privately fostered child is a child under 16 (or 18 if disabled) who is cared for by an adult who is not a parent, grandparent, aunt, uncle, step-parent (including civil partnerships), sister or brother where the child is to be cared for in that person's home for 28 days or more.

A child who is looked after or placed in any residential home, hospital or school (where they are receiving full-time education) is excluded from the definition. In a private fostering arrangement, the parent retains parental responsibility.

However, children under 16 who spend more than 2 weeks in residence during holiday time in a school, become privately fostered children for the purposes of the legislation during that holiday period. See also Schedule 8 (para 9) Children Act 1989.

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, (as per section 66(1)(a) and (b) of the Children Act 1989) with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

Looked After Children by the local authority or those who are placed in residential settings, children's homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures and children may be privately fostered at any age.

The College recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

Collingwood College is aware that, by law, a parent or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. We have a duty to inform children's services of this arrangement if they have not been notified, but we will encourage parents and private foster carers to do so in the first instance. Where a member of staff becomes aware that a child may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify the C-SPA immediately.

Useful links:

[Surrey Children's Services Procedure Manual Private Fostering](#)

[A5-Private-Fostering-leaflet.pdf](#)

## **Children potentially at greater risk of harm**

At Collingwood College, we know that all children need to be protected from harm. In addition, we recognise that some groups of children are potentially at greater risk of harm. The information below highlights some of the groups of children this applies to, however there are several other groups not listed.

### **Children who have a social worker**

Children may need a social worker due to safeguarding or welfare needs. Children may need help due to abuse, neglect and/or complex family circumstances. Collingwood College recognises that a child's difficult experiences and trauma can leave them vulnerable to further harm, as well as disadvantaging them educationally.

Children's services share with us which children have a social worker. Once we are aware of this information, we will use it to make decisions in the child's best interest, i.e. their safety, welfare and educational outcomes. When a child has a social worker, safeguarding is at the heart of every decision we make, such as how we react to unauthorised absence or children missing education, which themselves carry additional risks. When necessary, we offer extra in-college support to our children who have a social worker.

The Virtual School is a statutory service that exists to provide advice and support for children who have a social worker, children placed in care and previously looked after, such that they have the opportunity to meet their full educational potential. Where needed, our college works with the Virtual School to support these children.

### **Looked After Children (LAC) and Previously Looked After Children (PLAC)**

These children are particularly vulnerable. The most common reasons for children becoming looked after is as a result of abuse and/or neglect. Staff will have the skills and knowledge to keep looked after children and previously looked after children safe. Appropriate staff will have the information they need in relation to a looked-after child's legal status. For example, who has parental responsibility, who is not permitted to have contact and who is not permitted to know where the child is being educated, and the level of decision-making power the local authority has given the carer. The designated teacher for children looked after will always be a member of the SLT. The designated Governor for Safeguarding will also have oversight of this group.

The statutory guidance [Designated teacher for looked-after and previously looked after children](#) contains further information on the role and responsibilities of the designated teacher. The designated teacher ensures

that the College has the up-to-date details of the allocated social worker and the Virtual School headteacher in the local authority that looks after the child. The Virtual School has an additional role of managing extra funding which is used to support looked after children. The designated teacher will work with the Virtual School Head to discuss how the funding can be used to best support the child.

Useful links:

[Surrey Children's Services Procedure Manual Supporting the Education and Promoting the Achievement of Children with a Social Worker, Looked After and Previously Looked After Children](#)

[Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension](#)

## Children with special educational needs, disabilities and health issues

Our Special Educational Needs Co-ordinator and DSL work closely together to safeguard and support children who have special educational needs and disabilities (SEND), in particular when there are any reports of abuse. Our safeguarding curriculum, i.e. the ways we teach children to keep themselves and others safe, is adapted to meet the needs of children with SEND.

Collingwood College is aware that children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline, such as:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying), than other children.
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and the communication barriers and difficulties in managing or reporting these challenges.
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools, or the consequences of doing so.
- Additional support, curriculum-based and pastoral is always offered to children with SEND.

Useful links:

[Surrey Safeguarding Children Partnership Procedures Manual Children with Disabilities/Complex Needs](#)

## Identified areas of risk for our College

The College regularly shares community partnership intelligence using the community partnership intelligence form [Surrey Police](#) or via the Youth Engagement Officers to make our neighbourhood police aware of any information of concern we receive about the local area. The DSL attends the triannual Police and Education Intelligence Briefings as well as Serious Organised Crime Briefings and Prevent Briefings.

There are a wide range of issues that the College considers when sharing information.

- Areas on the College site where children feel unsafe or at risk of abuse.
- Areas where gangs or anti-social behaviour may be prevalent.
- Numbers of disabled children or those with English as an additional language.
- Road Safety.
- Accessing sports off site.
- Sharing the college site with other agencies.
- Building work/Contractors.

Useful links:

[Youth and school engagement | Surrey Police](#)

[Safer Communities Programme | Healthy Surrey](#)

## Lettings and off-site arrangements

If services or activities are provided by the College, under the direct supervision or management of our College staff, the safeguarding procedures listed in this policy will apply. This may not be the case when we hire or rent out the College to other organisations or individuals, such as community groups, sport associations and extra-curricular activities providers. We will make sure there are arrangements in place to keep children safe, regardless of whether they are children at our College.

To make sure the provider has the appropriate safeguarding arrangements in place, we will follow the government's [Keeping children safe during community activities, after-school clubs and tuition](#) non-statutory guidance. This includes checking that the provider has completed the essential pre-employment checks on their staff and that their staff are suitable to be around children. Where appropriate, we will seek assurance and check their safeguarding policies and procedures, as well as establish what the arrangements are for the provider to liaise with the College on safeguarding matters. We will terminate our agreement with the provider if they do not follow the safeguarding requirements listed in the agreement.

## Extended College and off-site arrangements

Where extended College activities are provided and managed by the College, our own child protection and safeguarding policy and procedures apply. When our children attend off-site activities, we will ensure that effective child protection arrangements, informed by thorough risk assessments, are in place.

When our children attend an alternative provision provider, we continue to be responsible for their safety and wellbeing. We will satisfy ourselves that the placement can meet the child's needs and obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. checks that we would otherwise perform on our own staff. This includes written confirmation that the alternative provider will inform us of any arrangements that may put the child at risk (i.e. staff changes), so that we can ensure ourselves that appropriate safeguarding checks have been carried out on new staff. We will always know where a child is based during College hours. This includes having a record of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. We will regularly review the alternative provision placements we make. Reviews will be at least half termly to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed. We follow the [statutory guidance for alternative provision](#).

Where a parent/carer expresses their intention to educate their child at home (also known as elective home education), we will work together with the parent/carer and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly relevant for children who have SEND, are vulnerable and/or have a social worker.

Useful links:

[Education provision for SEND - Surrey County Council](#)

[Alternative Provision: Alternative Curriculum Pathways and Reintegration Support - Surrey County Council](#)

## Children Absent from Education

All staff will be aware that children missing from education or persistently absent, without explanation and/or for prolonged periods can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Further, it may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so called 'honour'-based abuse or risk of forced marriage. We are also aware that absence can increase any existing safeguarding risks.

Attendance is closely monitored at the College to support us in identifying abuse and acting early. Our staff will be aware of our College's unauthorised absence and children missing education procedures. We notify children's services if a child who has a social worker is absent from College without a suitable explanation. To support the College's procedure for addressing children missing or absent from education, we make sure we have more than one emergency contact number for each child. We work in partnership with Surrey County Council Inclusion Service when patterns of absence give rise to concern, including notifying them when a child leaves the College without a new school being named.

Our attendance policy and procedures are set out in a separate document, which can be found online. The College follows the government's [Working together to improve school attendance](#) statutory guidance which sets out how schools must work with the local authority children's services where school absence indicates safeguarding concerns.

Useful links:

[The Inclusion Service Resources Area \(Surrey Education Services\)](#)

[Inclusion Service - Pupils missing out on education \(PMOOE\) \(Surrey Education Services\)](#)

[Children Missing Education statutory government guidance](#)

[Surrey Safeguarding Children Partnership Procedures Manual Children Missing Education](#)

## **Pupils Missing Out on Education (PMOOE)**

Most children engage positively with their education and attend regularly. However, to flourish, some students require an alternative education provision or may require a modified timetable to support a return to full time education provision. It is recognised that students accessing alternative provision, or a reduced/modified timetable, may have additional vulnerabilities. Ofsted refer to these as PMOOE because they are not accessing their education in a setting in the 'usual way'.

The College will gain consent (if required in statute) from parents/carers to put in place alternative provision and/or a reduced or modified timetable.

The College will ensure that parents/carers (and the Local Authority where the child has an Education Health Care Plan (EHCP)) are given clear information about alternative provision placements and reduced/modified timetables: why, when, where, and how they will be reviewed.

The College will keep the placement and timetable under review and involve parents/carers in the review. Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the child is benefitting from it.

The College will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child. The College continues to be responsible for the safeguarding of that student. We will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment.

The College will comply with regular data returns requested by Surrey County Council, regarding all children of statutory age, attending alternative provision and/or on a reduced/modified timetable.

The Senior Leadership Team will report to the Governing Board information regarding the use and effectiveness of alternative provision and modified/reduced timetables. The College will also report to Governors any formal direction of a child to alternative provision to improve behaviour.

## **Attendance and Behaviour**

Additional policies and procedures are in place regarding College attendance and behaviour.

The College recognises that students being absent, particularly repeatedly or for prolonged periods, may be indicators of abuse and neglect, including the exploitation of them. The DSL will regularly liaise with members

of staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

The College will work in partnership with Surrey Police and other partners for reporting children that go missing from the site during the College day. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

## Physical Intervention

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is at immediate risk of harming themselves or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained in Crisis Prevention Institute (CPI) techniques.

Staff understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection and/or disciplinary procedures.

We recognise that sometimes touch is appropriate in the context of working with children, and all staff have been given safe practice guidance to ensure they are clear about their professional boundaries.

When applying disciplinary measures such as physical intervention or isolation for children with SEND, the College will consider the risks, given the additional vulnerabilities of these children.

## Whistleblowing

We recognise that students cannot be expected to raise concerns in an environment where staff fail to do so.

A whistleblower is a worker who reports certain types of wrongdoing. All staff have a duty to do so. We aim to create an environment where staff feel able to raise concerns about poor or unsafe practice and potential failures in how we manage safeguarding. Any concerns should be raised with the senior leadership team and will be taken seriously. The College has a separate Whistleblowing Policy, which lists the procedures for raising concerns.

If it becomes necessary to consult outside the College, they should speak in the first instance, to the Area Schools Officer or LADO in accordance with the Whistleblowing Policy.

Staff are encouraged to use an external, independent and confidential service provided by Navex Global, who can be contacted on their freephone helpline number 0800 069 8180 and through the [Navex Global web pages](#)

[The NSPCC whistleblowing helpline](#) is also available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by the College. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Whistleblowing regarding the Principal should be made to the Chair of the Governing Board whose contact details should be available to staff.

## Training

### Designated Safeguarding Lead

The Designated Safeguarding Lead will attend regular training to prepare and assist them in leading the College's safeguarding response and approach. Additional training or research may be required as local or school specific safeguarding issues arise. As a minimum, the Designated Safeguarding Lead will:

- On appointment, the DSL (and DDSLs) initially undertake Surrey DSL 'New to Role' with 'Refresher' training at least every two years as well as attending DSL network events, to refresh knowledge and skills.
- Stay up to date with safeguarding knowledge, resources and changes.
- Have a good understanding of, and form a good relationship with, the Surrey Safeguarding Children Partnership by attending the triannual DSL Network events, sharing the learning with staff as appropriate and making sure staff are aware of any safeguarding training on offer.
- Attend harmful sexual behaviour and Prevent awareness training.
- Receive and share safeguarding (including online safety) updates (for example, via email, e-bulletins, and staff meetings) with staff.
- Make sure staff have regularly updated safeguarding training, updating staff who miss training at the earliest opportunity.
- Gain an understanding of how the College's filtering and monitoring systems work and how they can be best used to keep children safe in College.

## Governors

All Governors receive safeguarding and child protection training (including online safety) at induction, which prepares them for testing and challenging the College's procedures and policies, making sure they are working as they should. The training will be regularly updated.

Further:

- The Governing Board will make sure the Designated Safeguarding Lead has the time and resources to attend training.
- The Chair of Governors will receive training about managing allegations against the Principal to assist them in the eventuality that an allegation is made.
- The Governing Board will make sure that online safety is a theme in all staff training.
- The Governing Board will make sure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training.
- The Governor responsible for Safeguarding will make sure that staff and Governors attend safeguarding training at induction and regularly after that. They will attend regular training and receive e-bulletins or equivalent to stay up to date with the latest statutory guidance.

The Governing Board makes sure at least one member of every recruitment panel has completed safer recruitment training within the last five years. Collingwood College has a separate safer recruitment policy that explains what safeguarding checks are completed before employment to make sure those who work with children are suitable.

Useful links:

[Check a teacher's record](#)

[Individuals prohibited from managing or governing schools](#)

## All staff

Governors recognise the expertise that staff build up by managing safeguarding concerns on a daily basis and, as a result, have the opportunity to contribute to and shape staff training and this policy. All staff receive safeguarding and child protection training (including online safety) at induction. The training is regularly updated and reflects the whole College approach to keeping children safe. In addition, staff receive regular, at least annual, safeguarding updates (for example, via email, e-bulletins and staff meetings) to provide them with what they need to keep children safe.

Our training ensures that staff:

- Can spot the signs of possible abuse, neglect and exploitation.
- Know the College's safeguarding procedures and their role in carrying them out.
- Have awareness of and understand their role in the early help process and the process for making a referral to the local authority's children's services, including what may follow after a referral.
- Know what to do if a child tells them they are being harmed, including how to manage this information confidentially.

- Understand the reasons why children may not feel ready or know how to tell someone that they are being harmed.
- Receive Prevent training, which will prepare them for identifying children at risk of being radicalised into terrorism and how to challenge extremist ideas.
- Understand what cyber security the College has in place to keep children and staff safe when online at College and how to report any issues.
- Understand what ineffective filtering and monitoring systems look like and how to report any concerns or issues.
- Know that children who identify as or are perceived be LGBTQ+ can be targeted by other children.
- Know what to do if they have concerns about a member of staff (including supply staff, volunteers and contractors) posing a risk of harm to children.

The College makes sure that staff members provided by other agencies and third parties, for example supply teachers and contracted staff (such as catering staff), are aware of this policy, the College's safeguarding procedures, and have received appropriate safeguarding training.

All new staff receive basic training on induction, a more in-depth programme of face-to-face and online training across the academic year, with periodic updates and a mid-year safeguarding 'check-in'.

The Principal will receive training about managing allegations against staff to assist them in the eventuality that an allegation is made.

## The Designated Teacher for Looked After Children (LAC)

We follow the Role and responsibilities of the designated teacher's statutory government guidance. The designated teacher will have training to make sure they understand the needs of looked after/previously looked after children and how they can best be supported to have the same opportunities as their peers. They will work closely with Surrey Virtual School accessing their training and forums to stay up to date.

## Teaching and learning

At Collingwood we aim to prevent our children from coming to any harm. We recognise how important it is that we teach and role-model to children how to keep themselves and others safe. Our curriculum meets the needs of all children, including those with SEND and/or have been abused.

**Safeguarding is considered in all areas of teaching and learning but especially including:**

- **Personal, Social, Health and Economic Education (PSHE)**
- **Relationships and Sex Education (RSE)**
- **Assemblies**
- **Registration/tutor time**
- **Ambassador schemes (such as peer-mentoring/anti-bullying ambassadors)**

If specific safeguarding issues arise during the College year, the Principal will make sure the curriculum is adapted to cover current issues.

Useful links:

[Relationships Education, Relationships and Sex Education and Health Education guidance](#)

[Promoting children and young people's mental health and wellbeing - GOV.UK](#)

[Promoting Fundamental British Values as part of SMSC in schools](#) (guidance for maintained schools on promoting basic important British values as part of pupils' spiritual, moral, social and cultural (SMSC))

[SMSC requirements for independent schools](#) (guidance for independent schools on how they should support pupils' spiritual, moral, social and cultural development)

[PSHE: Relationships & Sex Education an Health Education Guidance](#)

[PSHE Drug Education Teaching and Learning Resource EYFS-KS5](#)

## **Links with other College policies and guidance**

Anti-Bullying Policy  
Child Exploitation  
Complaints Procedure  
Curriculum Policy  
Drugs Policy  
Equity, Diversity and Inclusiveness Policy  
E-Safety, including staff use of mobile phones  
Health, Safety and Welfare Policy  
Looked after Children and Previously Looked after Children  
Management of Allegations Policy  
Management of Behaviour Policy  
Physical Intervention Procedure  
PSHE Policy  
Prevent - Radicalisation and Extremism  
Recruitment and Selection Guidance Policy  
Risk Assessment  
School Attendance Policy  
Relationships and Sex Education Policy  
Sexual Violence and Sexual Harassment  
Single Equality Policy  
Staff Behaviour Policy / Code of Conduct  
Supporting Student with Medical Needs Policy  
Teaching and Learning Policy  
Transgender Policy  
Whistleblowing Policy

## **Additional Resources**

[Surrey Safeguarding Children Partnership webpages](#)

[Surrey Education Services \(surreycc.gov.uk\)](#) – Education Safeguarding Resources Hub

[Graded Care Profile 2](#)

[NSPCC | The UK children's charity | NSPCC](#)

[CEOP ThinkuKnow webpages](#)

[Anti Bullying Alliance webpages](#)

[Childnet International](#)

[Safer Internet Centre webpages](#)

[Contextual Safeguarding Network webpages](#)

[Lucy Faithfull Foundation webpages](#)

These appendices are based on the Department for Education's statutory guidance, **Keeping Children Safe in Education**.

## Appendix 1: Safer Recruitment

# Safer Recruitment Policy

### Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

#### Advertising

When advertising roles, we will make clear:

- The College's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

#### Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

#### Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

## Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is College based, we will ask for the reference to be confirmed by the Principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

## Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

## Pre-appointment vetting checks

We will record all information on the checks carried out in the College's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

### New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
- For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach.

- Check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state.

\* Management positions are most likely to include, but are not limited to, Principals, Vice Principals and senior/assistant Principals.

#### **Regulated activity means a person who will be:**

- Responsible, on a regular basis in a school, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

#### **Existing staff**

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

#### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

#### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the College has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the College.

#### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

## **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

## **Governors**

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

## **Staff working in alternative provision settings**

Where we place a student with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

## **Adults who supervise students on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a student under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

## **Students staying with host families**

Where the College makes arrangements for students to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the College is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner Colleges abroad to ensure that similar assurances are undertaken prior to the visit.

## Appendix 2: Allegations of abuse made against staff

# Allegations against staff (including low-level concerns) Policy

### Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of College

If we are in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

An investigating officer will lead any investigation. This may be the Principal, or a senior member of staff appointed by the Principal. Where the Principal is the subject of the allegation the investigating officer will be the Chair of Governors. The investigating officer will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

### Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the College so that the individual does not have direct contact with the child or children concerned;
- Providing an assistant to be present when the individual has contact with children;
- Redeploying the individual to alternative work in the College so that they do not have unsupervised access to children;
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted;
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school;

If in doubt, the investigating officer will seek views from the College's personnel advisor and the designated officer at the local authority, as well as the police and Surrey Children's Services where they have been involved.

### Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

## Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the investigating officer will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
- Discuss the allegation with the designated officer at the local authority (LADO) This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or Surrey Children's Services. (The investigating officer may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the investigating officer will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or Surrey Children's Services, where necessary). Where the police and/or Surrey Children's Services are involved, the investigating officer will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the College is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or Surrey Children's Services, as appropriate.
- Where the investigating officer is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the College and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in College and/or liaise with the police and/or Surrey Children's Services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Colleagues will be steered to support networks such as union representatives, or another colleague and/or human resources support networks for example for welfare counselling or medical advice.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with Surrey Children's Services and/or the police, if applicable). The investigating officer will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

If the College is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the College will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the College's disciplinary process, should this be required at a later point.

### **Additional considerations for supply teachers and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the College, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.
- The Governing Board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the College, while the College carries out the investigation.
- We will involve the agency fully, but the College will take the lead in collecting the necessary information and providing it to the LADO as required.
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

## **Timescales**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

## **Specific actions**

### **Action following a criminal investigation or prosecution**

The investigating officer will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or Surrey Children's Services.

### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the College ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the College will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the College will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the investigating officer will consider how best to facilitate this.

The investigating officer will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the College.

## **Unsubstantiated, unfounded, false or malicious reports**

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to Surrey Children's Services may be appropriate.
- Shown to be deliberately invented, or malicious, the College will consider whether any disciplinary action is appropriate against the individual(s) who made it.

## **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and investigating officer will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to Surrey Children's Services may be appropriate.
- Shown to be deliberately invented, or malicious, the College will consider whether any disciplinary action is appropriate against the individual(s) who made it.

## **Confidentiality and information sharing**

The College will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The investigating officer will take advice from the LADO, police and Surrey Children's Services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises.

## **Record-keeping**

The investigating officer will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken, decisions reached and the outcome.
- A declaration on whether the information will be referred to in any future reference.

In these cases, the College will provide a copy to the individual, in agreement with Surrey Children's Services or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

## **References**

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious.

- . Include substantiated allegations, provided that the information is factual and does not include opinions.

## Learning lessons

After any cases where the allegations are *substantiated*, the investigating officer will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the College's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff.
- The duration of the suspension.
- Whether or not the suspension was justified.
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, the investigating officer will consider the facts and determine whether any improvements can be made.

## Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the College that they were abused as a child, we will advise the individual to report the allegation to the police.

## Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- . Suspicion
- . Complaint
- . Safeguarding concern or allegation from another member of staff
- . Disclosure made by a child, parent or other adult within or outside the College
- . Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of students.

## Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the College may have acted in a way that:

- . Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; **and**
- . Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

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

- . Being overly friendly with children
- . Having favourites
- . Taking photographs of children on their mobile phone
- . Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- . Humiliating students

## Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Empowering staff to share any low-level concerns as per section 7.7 of this policy.
- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the College's safeguarding system.

The Principal and DSL will adopt an open-door policy in order to encourage the sharing of low-level concerns.

## Responding to low-level concerns

If the concern is raised via a third party, the Principal will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously.
- To the individual involved and any witnesses.

The Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the College's staff code of conduct. The Principal will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Low-level concerns can be reported in person – verbally (a written, signed and dated recording should be kept), via the College ReportIt@ email account or via CPOMS.

Keeping Children Safe in Education also links to this report for more information [\[Developing and implementing a low-level concerns policy: A guide for organisations which work with children\]](#)

## Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority.
- Retained at least until the individual leaves employment at the College

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

## Appendix 3

### Sexual violence

It is important that settings are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of the educational setting. When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

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

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

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE- Settings should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

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

### What is consent?

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

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

Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#).

### Sexual harassment

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. The College should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim;

- displaying pictures, photos or drawings of a sexual nature;
- upskirting (this is a criminal offence), and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)
- sharing of unwanted explicit content;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats, and
- coercing others into sharing images of themselves or performing acts they're not comfortable with online.

It is important that College staff consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

## Appendix 4: Safeguarding Rapid Response



### Safeguarding Rapid Response



#### CHILD PROTECTION AND SAFEGUARDING on CPOMS

**Always assign to Year Manager (PL) in first instance**

**Alert (copy in) PA and anyone else who may be interested/involved with that student, e.g. if you know Ramon has been involved with the family, Nic Everson if they are a looked after child, etc.**

**Alert (copy in) Jamie or Jess if it is level 2 or above, or if you feel it needs them to overview. Level 2 constitutes either social care involvement or a potential immediate risk to the student. Always alert the YM/PA to these situations too.**

**If in doubt, copy DSL/Deputy DSL in.**

**Year Managers (PL):**

Year 7 Katy Robinson

Year 8 Suzi Gulliford

Year 9 Harry Green

Year 10 Paul Andrews

Year 11 Sam Goggin

**Pastoral Assistants (PA):**

Sue Lee

Charlie Taylor

Laura Evans

Emily Ingram

Rianne Dillon

Designated Child Protection and Safeguarding staff include:

- MR J CLEARY – DESIGNATED SAFEGUARDING LEAD (DSL)
- Mrs J Hawkemore – Deputy DSL
- Mrs R Woods – Deputy DSL
- Mrs J Jennings – Deputy DSL
- Mrs C Chapman – Deputy DSL
- Mrs N Everson – Deputy DSL
- Ms N Akbar – Deputy DSL
- Mr P Jarzyn – Deputy DSL
- Mrs N Woolven - Assistant Inclusion Centre Manager/Deputy DSL
- Mrs N Everson – Designated Teacher for Looked After Children/Deputy DSL
- Mrs L Edwards – Progress Leader KS3
- Mr R San Emeterio – Progress Leader KS4
- Mrs S Goggin – Year Manager (11)
- Mr P Andrews – Year Manager (10)
- Miss S Gulliford – Year Manager (8)
- Mrs K Robinson – Year Manager (7)
- Mr H Green - Year Manager (9)
- Ms J Cornelius – Student Support Officer
- Miss E Hope – Student Support Officer
- Mrs L Boon – 6th Form Personal Tutor

## Appendix 5:

### Brook Sexualised Behaviour Tool

#### Behaviours: age 5 to 9 and 9 to 13

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

##### What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

##### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

##### Green behaviours 5-9

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

##### Green behaviours 9-13

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peers

##### What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

##### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

##### Amber behaviours 5-9

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

##### Amber behaviours 9-13

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

##### What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

##### What can you do?

Red behaviours indicate a need for immediate intervention and action.

##### Red behaviours 5-9

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

##### Red behaviours 9-13

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

## Behaviours: age 13 to 17

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

### What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

#### Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active

### What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

#### Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress,
- withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- taking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult- only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone

### What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

### What can you do?

Red behaviours indicate a need for immediate intervention and action.

#### Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there
- is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals
- receipt of gifts or money in exchange for sex

## Appendix 6:

### Risk Assessment for Child-on-Child Abuse/Harmful Sexual Behaviour

# Collingwood College

## Risk assessment for Child-on-Child abuse/ Harmful Sexual Behaviour

This risk assessment is intended to be used by the College whereby an incident(s) of Child on Child abuse has occurred or is likely to occur and is deemed appropriate. The risk assessment will show considerations made for both/all students involved and will highlight the plan in place to keep all students safe. This will also take into consideration the rights, wishes and feelings of all children involved. Each section/question will be considered from the perspective of all students involved. Considerations will also be given for the impact on, and needs of, the wider College community. All concerns and proposed actions will be recorded. The College will work with the local multi-agency safeguarding hub (MASH/C-SPA), the Education Safeguarding Lead and other agencies as necessary when completing this risk assessment. This document should be reviewed frequently to ensure it is fit for purpose. The terms victim and child alleged to have caused harm are used to identify the children involved. NB: there should be no assumption of guilt on the part of the child alleged to have caused harm, pending investigation.

## Human Rights Act & The Equalities Act 2010

When completing this risk assessment, safeguarding staff must have absolute consideration for the HRA and Equalities Act. The victim and child alleged to have caused harm (including parents) must be made aware of these rights. These rights include:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right);
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity;
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination;
- Protocol 1, Article 2: protects the right to an effective education. Being subjected to sexual violence or sexual harassment may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

### Equality Duty

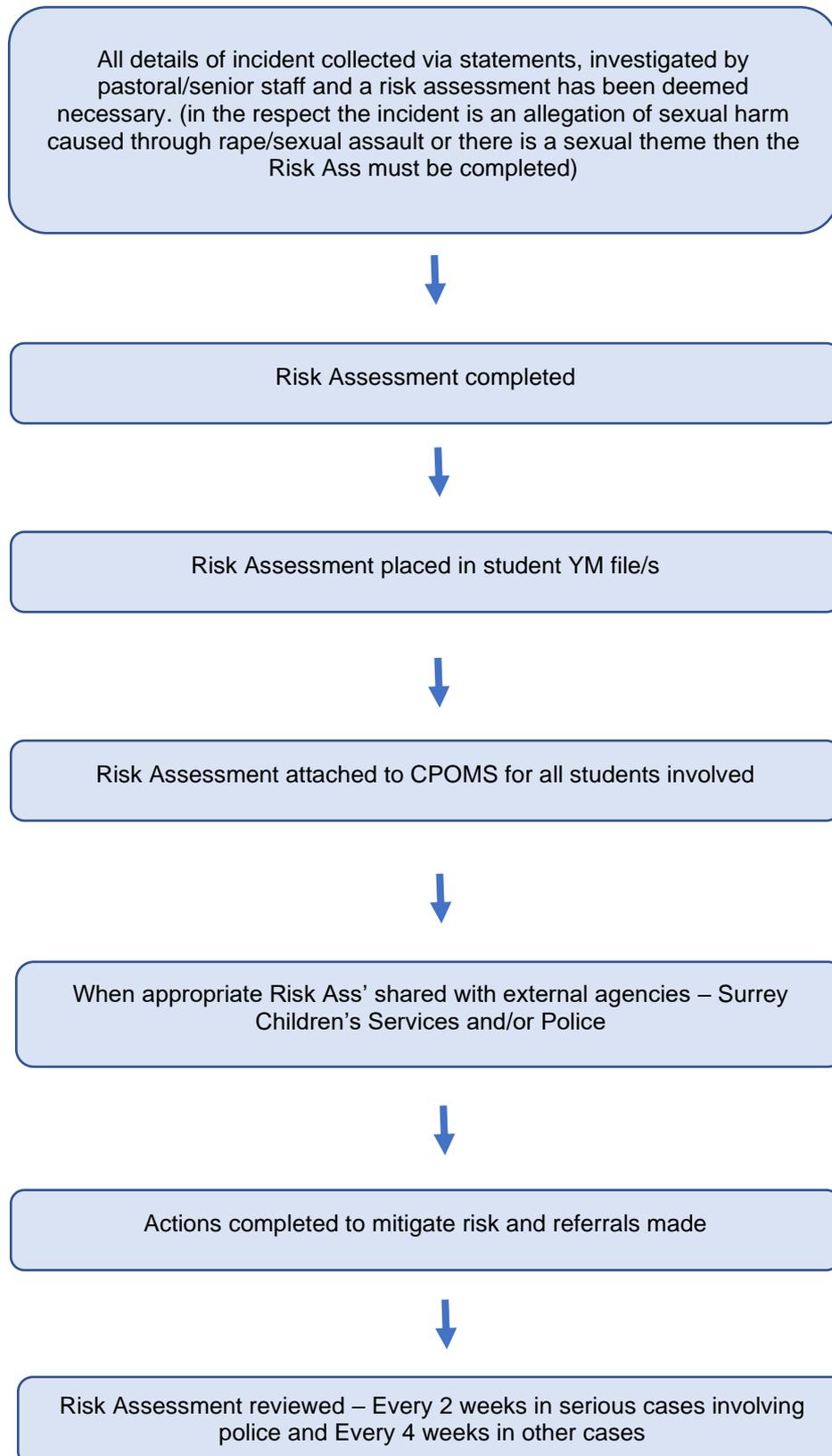
Education settings are required to comply with relevant requirements as set out in the Equality Act 2010 (the Equality Act).

- According to the Equality Act, education settings must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy or sexual orientation (protected characteristics).
- Whilst all of the above protections are important, in the context of this guidance education settings should carefully consider how they are supporting their pupils with regard to their sex and sexuality
- Provisions within the Equality Act allow education settings to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting one group. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

A risk assessment should be completed for all cases relating to sexual violence or alleged sexual violence. Sexual violence is defined by the sexual offences act 2002 as “criminal acts: rape, assault by penetration and sexual assault”.

This risk assessment should be completed with reference to KCSIE 2025.

This risk assessment should follow the detailed procedures below.



## RISK ASSESSMENT FORM

Basic Information		Details		
Name and role				
Contact details (email address and ext. phone number)				
Name of school/college(s) for victim(s) if not Collingwood College				
Name of school/college(s) for child/ren alleged to have caused harm if not Collingwood College				
Did the incident occur on College premises? If not, where did the incident occur?				
Considerations	Risk (consider victim, child alleged to have caused harm, other students and staff)	Risk level (high, medium or low)	Actions to reduce risk	Revised risk level (high, medium or low)
What is the incident?				
Who was involved?				
Where did it happen?				
Does this incident constitute a crime? Assault, sexual assault, rape, sharing of indecent images of children etc. etc. As such, has this been referred to the Police?				
Is it necessary to limit contact between the children involved? Refer to KCSiE and DfE guidance on sexual harassment and sexual violence in schools and colleges.				
Is there an actual perceived threat from the child alleged to have caused harm to the victim and/or others?				

Considerations	Risk (consider victim, child alleged to have caused harm, other students and staff)	Risk level (high, medium or low)	Actions to reduce risk	Revised risk level (high, medium or low)
Is either the victim or the child alleged to have caused harm at risk of physical harm as a result of this incident (for example, bullying or 'retribution' by peers)?				
Do they share classes?				
Do they share break times? Do they share peer/friendship groups?				
Do they share transport to/from College?				
Are they likely to come into contact with each other (or anyone else involved in/with knowledge of the incident) outside of College?				
How can such contact be limited?				
Is there a risk of harm from social media and gossip?				

**Further action taken by the College: Please complete for each child involved:**

**Student Name:**

Action	YES/NO	Date
Police informed		
Referral to MASH/C-SPA		
Referral to external support services		
Referral to internal support services		
Referral to CAMHS		
Referral to early help		
Other		

**Student Name:**

Action	YES/NO	Date
Police informed		
Referral to MASH/C-SPA		
Referral to external support services		
Referral to internal support services		
Referral to CAMHS		
Referral to early help		
Other		

**Student Name:**

Action	YES/NO	Date
Police informed		
Referral to MASH/C-SPA		
Referral to external support services		
Referral to internal support services		
Referral to CAMHS		
Referral to early help		
Other		

**Student Name:**

Action	YES/NO	Date
Police informed		
Referral to MASH/C-SPA		
Referral to external support services		
Referral to internal support services		
Referral to CAMHS		
Referral to early help		
Other		