SAFEGUARDING POLICY

This policy applies across the College at all age ranges including Early Years, Prep and Senior Schools. It should be read in conjunction with the following policies:

Anti–Bullying
Behaviour
Employee Whistleblowing
E-safety Policy for Staff
ICT Acceptable Use and E-safety for Students (includes mobile phones).
Health and Safety
Intimate Care Policy and Guidance
Medical and First Aid
Mental Health and Well-Being Guidance
Physical Restraint
Preventing Extremism and Radicalisation
Safer Recruitment
Staff Code of Safe Conduct
SEND
AI Policy
Student Attendance and Punctuality

St. Columba's College is conducted in the educational tradition of the Brothers of the Sacred Heart. The school environment is best described by the term "sanctuary," a place where students sense the compassion which motivates those who care for them, where they feel safe to become the best person God created them to be.

Policy owner:	Designated Safeguarding Lead - Mark Livesey
Date reviewed:	July 2025
Date of next review:	Aug 2026
Ratify by Governors:	ESP and Board

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Section 1 Introduction

St Columba's College strives to educate all its students within an environment where the Catholic traditions of learning, truth, justice, respect and community are promoted. Consequently, the overall aim of this policy is to safeguard and promote the welfare of all the children in our care. We recognise that all children without exception, have the right to protection from harm, regardless of their needs or protected characteristic such as their gender, ethnicity religion or belief. All systems, processes and policies operate with the best interest of the child at their heart.

This policy and guidance are consistent with the aims of the Government in the safeguarding and promoting of the welfare of children to:

a. In line with the safeguarding definition in KCSIE (para. 3), provide timely help and support to address children's needs as soon as concerns arise.
b. Protect children from maltreatment whether that is within or outside the home, including online
c. Prevent impairment of children's mental and physical health or development
d. Ensure that children are growing up in circumstances consistent with the provision of safe and effective care
e. Take action to enable children in need to have the best outcomes

Child protection is part of safeguarding and promoting the welfare of children and is defined as activity that is undertaken to protect children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

The College operates its safeguarding procedures in line with locally agreed inter-agency procedures, as set out by Hertfordshire Safeguarding Children Partnership.

This policy has regard to the following guidance and advice:

- KCSIE 2025,
- Working Together to Safeguard Children 2023.
    - What To Do If You Are Worried that a Child is being Abused – Advice for Practitioners (March 2015).
    - Information sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers (May 2024)
- RSHE Statutory Guidance (September 2021) - *NOTE - this be updated ahead of next academic year when the new guidance comes into force.*
- Children Missing Education (August 2024)
- Multi Agency Guidance on FGM (July 2020)
- Behaviour in schools (February 2024)
- The Serious Violence Strategy 2018.
- Prevent Duty Guidance 2023.
- Charity Commission guidance *Safeguarding and protecting people for charities and trustees* (June 2022)

- Standards for Filtering and Monitoring In Schools and related guidance on digital and technology standards in schools and colleges (March 2025).
- Data Protection Act 2018 and UK GDPR –DPA/UK GDPR requirements
- Hertfordshire Children Services Continuum of Need for Children and Young People guidance.
- Working together to improve school attendance 2024
- After school clubs, community activities, and tuition (safeguarding guidance for providers) (September 2023)

The **Designated Safeguarding Leads** (DSLs) in the College are:

- Mr Mark Livesey in the Senior school who can be contacted by telephone on 01727 855185 or by email at livesey.m@stcolumbascollege.org.

- Mr K Boland in the Preparatory School (including EYFS) who can be contacted by telephone on 01727 862616 / 01727 892016 or by email at boland.k@stcolumbascollege.org

  These members of the College Leadership Team (CLT) deputise for one another when absent, responding to all concerns across all educational stages. However, in their absence any child protection concern must be referred to the Head (Head@stcolumbascollege.org), or the nominated Deputy DSLs (Mrs K Marson & Mr J Tatham) who can be contacted by email at deputy@stcolumbascollege.org & Tatham.j@stcolumbascollege.org or by telephone on 01727 855185.

  The **overall principal Designated Safeguarding Lead** is Mr Mark Livesey.

- The **Governor Responsible** for monitoring safeguarding at the College is Mrs Beth Sharpe who carries out termly visits and an annual review. The Safeguarding Governor can be contacted via email at gov.admin@stcolumbascollege.org The Governors also receive safeguarding updates at all Board meetings. The Chair of Governors can be contacted at gov.admin@stcolumbascollege.org

Section 2 Principles

The main elements of the policy apply to all staff and governors by which we seek to:

a. Ensure the practice of safer recruitment in checking the suitability of staff (including Governors and Volunteers) appointed to the College
b. Raise awareness of safeguarding and child protection issues, so equipping children with the necessary skills needed to keep them safe.
c. Ensure the Pastoral Programme includes topics to educate students to keep safe such as grooming, counter bullying and online safety.
d. Implement procedures for identifying and reporting cases, or suspected cases, of abuse in accordance with locally agreed interagency procedures.
e. Support students who have been abused, in accordance with the terms of the policy.
f. Establish a safe environment in which children can learn and develop.
g. Provide the Designated Safeguarding Lead and staff with relevant training and support.
h. Make provision for immediate remedy to any deficiencies in practice, procedure and duties or improvements in policy and practice as they occur.
i. Be particularly alert to the potential need for early help or intervention in students.

Section 3 EYFS (Early Years Foundation Setting)

The College adheres to the requirements set out in the EYFS Statutory Framework including the requirements regarding paediatric first aid training, safer eating and children's privacy in relation to toileting and nappy changes.

Use of Mobile Phones

Pupils are not allowed to use mobile phones or cameras in school. In the EYFS setting staff are not permitted to use their personal mobile phone. When children in the EYFS setting go on a school trip, the school camera should be used to capture images of the children. Any volunteer helpers on the trip are made aware of this requirement before the trip commences. Staff who act in breach of this may be subject to disciplinary action

Those working in the early years provision will receive training every two years consistent with Annex C of the Early Years Statutory Framework, which may be refreshed annually as needed.

Disqualification from working in childcare

Where staff work in, or are involved in the management of, the College's early years or provision of care of pupils under the age of eight, the school will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the College's safer recruitment practices. Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the College will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the College will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

Section 4 The application of College policy

The College has a duty to consider at all times the best interests of the student and take action to enable all students to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility. The College adopts a 'whole school' approach to safeguarding.

This means involving everyone in the College and ensuring that safeguarding and child protection are at the forefront, underpinning all relevant aspects of processes and policy development..

The nature of the regular contact with students on a daily basis means that the College staff are well placed to observe the outward signs of abuse. The school will therefore:

a. Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
b. Ensure children know that there are individuals, adults and peers whom they can trust and approach to raise their concerns, and they know and understand the systems in place for doing so.
c. Refer any concerns to the DSL who then coordinates the required response, which may require in-house support or be referred to outside agencies as the case determines.
d. Ensure that early help is provided in the speediest and appropriate way through liaison and cooperation with external agencies, including the 3 safeguarding partners (local authority, Integrated Care Board and local Chief of Police).
e. Include opportunities in the Pastoral Programme for children to develop the skills they need to recognise and stay safe from abuse.
f. Ensure as part of the RSHE curriculum, the promotion of a zero-tolerance culture towards abuse including (but not limited to) sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.
g. Operate clear and supportive polices related to drugs, alcohol and substance abuse.
h. Operate clear and supportive policies in relation to e-safety and cyber bullying (see separate policies) to ensure that provision is made to teach children of all ages to keep themselves safe online.
i. Operate clear and supportive policies related to relationships including sexual aspects of relationships for both boys and girls.
j. Ensure that whenever staff from another organisation are working with our students on another site, that the appropriate assurances have been received from the competent authorities within the organisation/s that appropriate child protection checks and procedures apply to those staff.
k. Ensure that external coaches and peripatetic teachers have appropriate safeguarding and child protection policies and procedures in place. They are subject to DBS checks, are registered centrally by Human Resources, and adhere to safeguarding procedures, such as signing in when on site and knowing how to report safeguarding concerns.
l. Operate robust Health and Safety procedures, ensuring that the school premises are as secure as circumstances and daily operation permits.

m. Develop awareness in all staff of the need for Child Protection and their responsibilities in identifying abuse.
n. Ensure that in the Senior school, Prefects and Peer Mentoring programme members are aware of their responsibilities in identifying abuse and the need to report it.
o. Ensure all staff are aware of referral procedures within the school.
p. Monitor children who have been identified as 'at risk'.
q. Ensure regular and timely liaison between the Counsellor and the DSL.
r. Ensure the presence of an appropriate adult to support, advice and assist if a pupil is being questioned or detained by the police.
s. Ensure relevant checks are undertaken when letting the college to external parties.

Confidentiality

Students are actively encouraged to raise personal and general concerns with members of staff and seek advice in confidence. It is important to note, however, that such discussions, whilst remaining confidential in nature, must take into account a full appreciation of duty of care. This means that **staff should not guarantee absolute confidentiality** (as this may ultimately not be in the child's best interests) and that information needs to be shared with the appropriate person who will ensure that the correct action is taken.

All staff with tutor responsibility, the Ministry Team, Chaplain and Counsellor have very particular roles in being available to all members of the school community and in the case of the last mentioned, to offer confidential counselling.

It is important to note that whilst confidentiality and discretion are important in dealing with students, as noted above **CONFIDENTIALITY CANNOT BE GUARANTEED IN RESPECT OF CHILD PROTECTION ISSUES.** Where legally required to do so, staff must share child protection concerns with the relevant agencies, even if this goes against a child or parents' wishes. KCSIE 2025 is clear that fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Section 4 Roles, Responsibilities and Training

Training needs are assessed periodically. The nature and intensity of training required depends upon the number and type of safeguarding and child protection issues experienced by the College. Induction and training are in line with advice from Hertfordshire Safeguarding Children Partnership.

All Staff

All Governors, staff and volunteers have a responsibility in school to be alert to the symptoms and triggers of abuse, neglect and exploitation or other safeguarding concerns, to share information and to work together to provide a safe environment where children can learn.

All new staff complete online Level 1 Child Protection training prior to joining the school and take part in the induction training throughout their first term (including in relation to school policies on Safeguarding (including dealing with child on child abuse), Staff Code of Safe Conduct, Behaviour Policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying), including the College's whistleblowing procedure and the E-Safety Policy(acceptable use of technologies policy) , staff/pupil relationships and communications including the use of social media which includes the ICT Acceptable Use guidance, Children Missing Education (which includes the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children missing education), and DSL / DDSL role and identity). Induction training also covers online safety, including expectations, roles and responsibilities in relation to filtering and monitoring (In house). School leaders and staff who work directly with children will also be required to read Annex B of *KCSIE (and Part five of KCSIE)*.

All staff are also required to:

- Read at least Part one of *KCSIE* (or, for staff that do not work directly with children, Annex A) and confirm that they have done so. Each time Part one of *KCSIE* is updated staff will be updated on the changes via the September safeguarding INSET session. Records are retained by the HR manager.
- Understand key information contained in Part one (or, for staff that do not work directly with children, Annex A) of *KCSIE*. The College will ensure staff understanding by staff signing off to confirm they have read and understood the information.
- Receive training in safeguarding and child protection regularly, in line with advice from Hertfordshire Safeguarding Children Partnership. Such formal safeguarding training takes place at least annually as part of the INSET cycle. Training will include online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and harmful sexual behaviours (including child on child sexual violence and harassment). It will also include Prevent awareness training to equip staff to understand the factors that lead people to support terrorist ideologies or engage in terrorist related activity, be able to recognise susceptibility to terrorism and be aware of what action to take in response, including the College's internal Prevent arrangements.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The College provides these via, regular refreshers led by the DSLs e.g. online courses, scenarios, policy sign off, covering all

types of abuse as outlined in KCSIE as well as school specific needs. It also includes issues which are pertinent to girls such as Female Genital Mutilation and Forced Marriage.

All EYFS staff are required to attend safeguarding training specifically designed for staff caring for 0–5-year-olds which must cover all the areas set out in Annex C to the EYFS Statutory Framework: "Criteria for effective safeguarding training."

Training will be renewed every year by the DSL, and all staff are required to attend. EYFS staff are supported to put their training into practice via regular updates and reminders from the DSL and inset training sessions, as well as termly meetings with the Key Stage lead for EYFS which will always include safeguarding as an agenda item.

Permanent, temporary, voluntary and supply staff (including volunteers

Permanent, temporary, voluntary and supply staff are made aware of the child protection arrangements and procedures in place within the College through induction in the form of:

a) A presentation by one of the DSLs re the safeguarding arrangements at the College
b) The College Safeguarding Policy (indicating the names of the DSLs)
c) The Staff Code of Safe Conduct
d) The Whistleblowing Policy
e) Part one of KCSIE
f) E-safety Policy (including The ICT Acceptable Usage Policy)
g) The Behaviour Policy
h) Children Missing Education Statutory Guidance

External coaches, invigilators and peripatetic teachers are provided with basic training on safeguarding procedures.

Designated Safeguarding Leads (DSLs)

The DSLs are members of the College Leadership Team. Care is taken to ensure that they can complete their role effectively. The DSLs, including deputies, complete Level 3 CP training every two years in addition to other CPD opportunities including online safety and inter-agency training. Further details of the required training content for the DSL are set out in Annex C of *KCSIE.*

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. In particular, the College will support the DSL in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

The DDSLs are trained to the same level as the DSL.

The main responsibilities are outlined below:

a. To ensure that all staff know the **nominated individuals** responsible (and in their absence the DDSLs or Head) for safeguarding issues.

b. To be available to all staff for consultation on child protection issues, including online safety during term time and during school hours. If a DSL or DDSL is not available in person, to ensure staff know they be contacted via internal phones, DSL emergency number (listed on the back of staff ID cards and email (which are on page 5. For out of hours/out of term activities, the College's arrangements via email or DSL emergency number. For external parties there is an additional online form on the website .

c. To take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).

d. To open channels of communication with local statutory agencies (including the local authority children's services, the DBS, Channel and the police) where appropriate.

e. To refer incidents to the appropriate agencies.

f. To liaise with those Safeguarding Officers appointed by the different authorities with which the school may need to form a relationship over safeguarding issues and the (Local Area) Designated Officer for Hertfordshire as appropriate.

g. To facilitate ongoing and regular training on safeguarding for all staff at the College.

h. To review the College's Policy on safeguarding with the Deputy Head (Senior), Head, Link Governor and College Leadership Team on an annual basis and present changes for ratification to the Governors' Education, Strategy and Policy committee who then recommend it to the full Board for adoption at the next full Board meeting.

i. Where appropriate to take part in child protection conferences or reviews. In the case of non-attendance to ensure that a key member of staff attends. Where this is not possible, to provide a written report to the conference from the College.

j. To maintain records of relevant information on CPOMS (except historic files, which are stored separately and securely) and to disseminate information about the child as appropriate.

    - Record to include

        i. A clear and comprehensive factual summary of the concern

        ii. Details of how the concern was followed up and resolved including rationale.

        iii. If a decision not to refer is made, the reasons behind this is logged.

        iv. Notes are kept of any action taken, decisions reached and the outcome.

k. To inform the relevant authorities when a child moves to another school and to share any child protection files within 5 days of transfer with the new school in line with Annex C of KCSIE. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school 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.

l. To inform CME (Children Missing in Education) when a child moves or is withdrawn from the College at any stage of the school year and hasn't started at another education provider, with the exception of students not returning to 6th Form (post-16).

m. To raise staff awareness and confidence of safeguarding (including online safety) procedures and to ensure new staff are aware of these procedures through induction training and specifically the new staff seminar programme.

n. The DSL is the Prevent lead and ensures that staff have appropriate Prevent training and induction.

o. The DSL is also the Mental Health Lead within the College.

p. To liaise regularly with the Behaviour and Attendance Lead & SENDCO, so that a full understanding of need and context is available.

q. To regularly review the College's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

Full details can be found in Annex C of KCSIE.

Governing Body Responsibilities

The governing body will ensure that all governors receive appropriate safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the College are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

The governors ensure that the College contributes to inter-agency working to include local authorities and any interagency safeguarding procedures as may be set up by safeguarding partners in line with the statutory guidance Working Together to Safeguard Children 2023. Governors are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, the Data Protection Act 2018 and the UK GDPR. In addition, the governing body complies with the DfE's Data Protection guidance for schools, ensuring school staff, governors know how to comply with data protection law, develop their data policies and processes, what staff and pupil data to keep and the importance of good practices for preventing personal data breaches.

Safeguarding is a standing items at meetings, providing leadership with the opportunity to report on current issues and for governors to raise questions.

The governors ensure that students receive safeguarding education through teaching and learning opportunities, as part of a broad and balanced curriculum.
The governors also take steps to ensure that

a) individuals who pose a risk of harm to students are not employed.

b) procedures are in place to manage allegations against staff members and volunteers.

c) procedures are in place to manage allegations against other children.

A nominated and sufficiently qualified member of the Board of Governors, Mrs Beth Sharpe is identified as the **Child Protection Led Governor** to liaise with local authorities and partner agencies on issues of safeguarding and in the event of allegations of abuse made against the Head.

Section 5 Signs and Types of Abuse

All staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. Therefore, staff should always be vigilant and always raise any concerns with the DSL or DDSL. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSL, should consider whether children are at risk of abuse or exploitation in situations outside the home. This is often referred to as "extra-familial harm.' Extra-familial harm can occur in a range of extra-familial contexts, including in school, peer groups, or within community/public spaces, and/or online.

There are four main categories: Physical, Emotional, Sexual and Neglect: Definitions are taken from *"Working Together to Safeguard Children 2023"*

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children, commonly called child-on-child abuse. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.

All staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. SEND students can be particularly vulnerable to abuse, including child-on-child abuse and there are additional barriers to recognising abuse or neglect with these children, including assumptions regarding indicators of possible abuse (i.e. behaviour, mood, injury) as relating to the child's condition without further exploration.

Abuse can take place online and technology may be used to facilitate offline abuse and is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. Other groups of students who can be especially vulnerable to abuse include; those at risk of FGM or forced marriage, those at risk of CSE, those who run away or go missing. Behaviours linked to issues such as drug taking and or alcohol misuse, unexplainable and/or persistent absences from education,and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Detailed advice about the sharing of images can be found at: https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people

Staff should be clear to understand that in disclosure of alleged abuse cases they are not making a diagnosis, only receiving concerns. None of the signs listed below may actually prove that a child is being abused and these indications should not be taken as proof. They MAY be indicators, which when put into context, provide justification for action.

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.
Possible signs of physical abuse are:

a) Unexplained injury or refusal to explain or discuss them.
b) Cigarette burns
c) Long bruises (possibly made by a belt)
d) Teeth marks
e) Fingertip / nail / slap marks or bruises
f) History of bruises / injuries with inconsistent explanations
g) Bilateral black eyes
h) Self-destructive comments, possibly repeated, or tendencies.
i) Aggression towards others
j) Untreated injuries
k) Fear of medical treatment
l) Unexplained or unaccounted for patterns of absence (to avoid exposure of injury).

Emotional Abuse

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

Its diagnosis may require medical, psychological, psychiatric, social and educational assessment. There can be instances where there are multiple forms of abuse ongoing simultaneously and emotional should not be determined to be the lesser of the two as it will depend on the child as to which form is having the more significant impact.

Possible signs of emotional abuse are:

a) The child is developmentally delayed.

b) Inappropriateness of social responses
c) Self-mutilation
d) Extreme passivity or aggression
e) Truanting from school or running away from home.
f) Drug or solvent abuse (either in the child or in its principal carer/s)
g) Excessive fear of situations of people
h) Social isolation
i) Depression
j) Pressure (possibly when carers are unstable emotionally or behaviourally)

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person (legally under 18) to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape which includes 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. Under no circumstances can under-age sex issues remain secret.

The key elements in any definition of sexual abuse are:

1. The betrayal of trust and responsibility
2. Abuse of power for the purpose of the sexual gratification of the abuser
3. The inability of the child to consent.

Possible signs of sexual abuse are:

a) Depression, suicidal tendencies, self-harming
b) Anorexia or bulimia
c) Acting in a sexually inappropriate manner towards adults/peers
d) Pregnancies
e) Truanting/ running away from home.
f) Seeking guidance for a “friend with a problem of abuse”.
g) Sexually abusing a younger child / sibling
h) Sudden changes in school or work habits
i) Fear of people
j) Abnormal precociousness or aggression
k) Chronic medical problems (stomach pains / headaches)
l) Withdrawal, excessive self-isolation

m) Genital / abdominal or anal injury or pain
n) Reluctance to undress for Games/PE
o) Sexually transmitted diseases

In the case of a disclosure of sexual abuse in students under 18, this must be reported to the police. For students over 18, a decision will be taken by the DSL, keeping the student at the centre of the decision making. Relevant statutory guidance will be consulted, and the DSL might take legal advice if necessary.

Neglect

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

Possible signs of neglect are:

a) Failure to thrive (looks thin, emaciated, unwell, below average height, weight)
b) Unusual hunger
c) Has regular accidents especially burns
d) Poor personal hygiene
e) Avoidance of school medicals
f) Tiredness
g) Reluctance to go home
h) Poor social relationships
i) Frequent lateness / non-attendance
j) Inappropriate clothing

Mental Health

All staff should be aware that mental health and behaviour problems can be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Staff are well placed to observe children's behaviour however only appropriately trained professionals should attempt to make a diagnosis. If staff have a mental health concern that is also a safeguarding concern, immediate action should be taken, following the procedures detailed in the Flowchart 1 of this document. More information can be found in Mental Health and Behaviour in Schools Guidance.

Early Help

Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. All staff undertake appropriate training to ensure that they know when to share information with other agencies and what action to take to support early identification and assessments.

In the first instance, staff identify a student who may benefit from early help should discuss this with the DSL. If appropriate, the DSL will work with the Hertfordshire Safeguarding Children Partnership to undertake an assessment of the need for early help. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. Further guidance on effective assessment of the need for early help can be found in Working Together to Safeguard Children (December 2023). If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the student's situation does not appear to be improving.

Early help can be particularly useful to address non-violent Harmful sexual behaviour (HSB) and may prevent escalation of sexual violence. DSL and deputies are aware of the local Early Help process and how and where to access support. Early help can also prevent further problems arising, for example, if it is provided as part of a support plan where a child has returned home to their family from care.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care, and if appropriate the police, is made immediately.

Effective early help relies upon the school engaging and working with local agencies to:

1. identify children and families who would benefit from early help;
2. undertake an assessment of the need for early help; and
3. provide targeted early help services to address the assessed needs of a child and his/her family which focuses on activity to significantly improve the outcomes for the child.

Early help identifying factors as per KCSIE are;

a. Is disabled or has certain health conditions and has specific additional needs.
b. Has special educational needs (whether or not they have a statutory Education, Health and Care plan).
c. Has a mental health need.
d. Is a young carer.
e. Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
f. Is frequently missing/goes missing from education, home or care.
g. Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
h. Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
i. Is at risk of being radicalised or exploited.
j. Has a parent or carer in custody, or is affected by parental offending.

k. Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
l. Is misusing alcohol and other drugs themselves.
m. Is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
n. Is a privately fostered child.

Local authorities, under section 10 of the Children Act 2004, have a responsibility to promote inter-agency cooperation to improve the welfare of children.

Alternative Provision

Where the College places a student with an alternative provision provider, it continues to be responsible for the safeguarding of that student and should be satisfied that the placement meets the student 's needs. This includes obtaining written information from the alternative provider regarding safeguarding checks on individuals working at their establishment and written confirmation that the alternative provider will inform the College of any arrangements that may put the child at risk.

The College:

- should always know where a child is based during school hours and retain records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend.
- should regularly review (at least half termly) the alternative provision placements they make.
- immediately review, and terminate, if necessary, a placement where safeguarding concerns arise unless or until those concerns have been satisfactorily addressed.

Section 6 Specific Types of Safeguarding Concerns

Sexual harassment

This is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. 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. 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; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Sexual violence

This refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

Child-on-child sexual violence and/or harassment:

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Harmful sexual behaviour

This is problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, 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.

Sharing of nudes and/or semi-nudes

The sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'. Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (March 2024) sets out the classification of incidents, and how each should be handled.

Serious violence

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

Risk factors which increase the likelihood of involvement in serious violence include being male, frequent absence or permanently exclusion from school, experience of child maltreatment or involvement in offending, such as theft or robbery.

County lines

This is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are increasingly being targeted and recruited online using social media.

Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE may be applicable to where children are involved in county lines:

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

Managing Safeguarding Responsibilities for 'Adult' Students

This would typically occur when a student has repeated Year 12 and is therefore a year behind their peers; such students will have been part of the St Columba's Sixth Form in lower sixth (Year 12) and will turn 19 during their final year in school, upper sixth (Year 13).

St Columba's College recognises that a 19 year old student requires appropriate safeguarding consideration, even though it does not represent a significant departure from existing practice. Most Sixth Form students become adults (18+) during Year 13, and the College already manages adult pupils effectively within its established policies and procedures. Behaviour is positively supported at all ages and stages of the school. While turning 18 is primarily a legal milestone, the College acknowledges that students who are no longer of school age, such as a 19 year old, may pose distinct risks, particularly in relation to behaviour, peer dynamics, or interactions with younger students or staff.

To address this, a comprehensive risk assessment has been carried out to identify any such risks and outline appropriate mitigation. Safeguarding policies and expectations apply equally to all students regardless of age. Sixth Form students are regularly reminded that school rules are universal, and staff are fully briefed to ensure consistent implementation. With access to full pastoral, medical and counselling support, alongside a culture of respect and inclusion, the College ensures a safe and supportive environment for the entire school community.

Radicalisation and PREVENT

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. **Extremism** is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas. **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

(The Counter-Terrorism and Security Act 2015, Prevent 2023 and KCSIE place a duty on schools and therefore staff members to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). The Act also places a duty on local authorities to ensure Channel panels are in place. The panel must include the local authority and chief officer of the local police. Panels assess the extent to which identified individuals are vulnerable to being drawn into terrorism, following a referral from the police and where considered appropriate and necessary consent is obtained, and arrange for support to be provided to those individuals. The Act requires partners of Channel panels to cooperate with the panel in the carrying out of its functions and with the police in undertaking the initial assessment as to whether a referral is appropriate. Schools are listed in the Act as partners of the panel. In alignment with our statutory safeguarding responsibilities and the evolving principles of Martyn's Law (Protect Duty), we are committed to ensuring the safety and security of all pupils, staff, and visitors. The College recognises the need for proactive measures to deter and respond to potential terrorist threats and other emergencies.)

The College takes seriously its responsibilities with regard to tackling extremism and preventing radicalisation (including via online activities) and addresses these matters through the curriculum and pastoral programmes for the students. It undertakes the necessary training and guidance required for staff to be able to respond appropriately. Our safeguarding approach includes:

- PREVENT risk assessment as part of our wider site security strategy
- Routine training for all staff and students on responding to critical incidents, including lockdown scenarios.
- Close collaboration with Hertfordshire Constabulary and other relevant local agencies on emerging threats.
- Clearly defined lockdown procedures regularly reviewed and rehearsed.

A separate policy "Preventing Extremism and Radicalisation Policy" provides the detail of response in full to safeguard our students. There is also a PREVENT risk assessment completed annually.

Child Sexual Exploitation (CSE) & Child Criminal Exploitation (CEE)

CSE is a form of child sexual abuse which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any persons (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The below CCE indicators can also be indicators of CSE, as can:

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

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into taking part in any criminal activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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. 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, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money, or new possessions
- children who associate with other children involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late, and
- children who regularly miss school or education or do not take part in education.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help maintain their education.

Honour Based Abuse

So-called 'honour-based' abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation, forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

All forms of this are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff are to speak to the DSL. If staff have a concern regarding a child that might be at risk of HBA they should activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

Female Genital Mutilation

Female Genital Mutilation (FGM) is the collective name given to a range of procedures involving the partial or total removal of external female genitalia or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. FGM is carried out on girls of any age, so school staff are trained to be aware of risk indications. Many such procedures are carried out abroad and staff should be especially alert to concerns expressed by girls about long holidays abroad in the summer. Forced marriage, and practices such as breast ironing are all forms of abuse (regardless of the motivation) and should be handled and escalated as such.
Examples of indications that a girl has already been subjected to FGM:

- A student may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A student may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from school and/or noticeable behaviour changes (e.g. withdrawal or depression) on the student's return.
- A student is reluctant to undergo medical examination

If in any doubt staff should speak to the DSL. In addition, there is a specific legal duty to teachers in relation to FGM. If a teacher discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a girl under 18, the teacher must report it to the Police. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18, teachers should follow the College's local safeguarding procedures.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found in the *Multi-agency guidelines: Handling cases of forced marriage (last updated April 2023)*

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA or FGM, or already having suffered HBA or FGM.

Online Safety, Filtering and Monitoring and AI

The governing body ensures that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside of school, in order to reduce risks and build resilience, including to radicalisation and extremism. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The College recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some children with SEND might be needed.

All members of staff should regard online activity as a safeguarding matter by ensuring that recommended sites and research areas are appropriate, within a general awareness of the potential for online abuse including grooming, child sexual exploitation, cyber-bullying, exposure to extremist ideology and online radicalisation, among other harmful online activities. We recognise that online abuse can occur wholly online or be used to facilitate abuse in real life.

In the Pastoral Programme and IT lessons, students are taught how to keep themselves safe online. Teachers have a responsibility to educate parents as well as students about the potential dangers that are present online.

The breadth of issues within online safety can be categorised into four areas of risk:

1. **content**: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories
2. **contact:** being subjected to harmful online interaction with other users
3. **conduct**: (personal) online behaviour that increases the likelihood of, or causes, harm.
4. **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The College recognises that students and staff are able, via their personal devices and mobile phone networks, to access materials which cannot be limited or restricted. As such, the behaviour policy (for students) and the Staff Code of Safe Conduct detail safeguards for use of personal devices whilst in school.

To safeguard students from harmful and inappropriate online material, the College has appropriate filtering and monitoring systems in place, which are reviewed annually. These systems are designed to block harmful content without unreasonably affecting teaching and learning. The College is compliant with the meeting digital and technology standards in schools and colleges guidance set by the Department for Education. Additionally, key staff, including the Designated Safeguarding Leads, receive regular reports alongside more urgent alerts from monitoring systems to effectively address safeguarding needs. Responsibilities for managing filtering and monitoring are clearly assigned and

leaders maintain strong oversight and know how to escalate concerns when necessary. Use of testing software is run regularly to ensure compliance. Regular review of digital learning and online safety measures takes place to ensure they remain effective and up to date. Amongst other tools we use government guidance to plan and implement digital technology strategies that keep students safe online, prevent cyber incidents, and ensure our technology is upgraded and maintained in a cost-effective and efficient manner.

This approach combines evaluation of safeguarding risks with practical considerations informed by risk assessments such as those required under the Prevent Duty. Further guidance is available in the E-safety Policy for Staff and the ICT Acceptable Use and E-safety guidance for Students, which also covers mobile phone use.

The College has developed a dedicated AI Policy, and students are proactively taught about this policy as well as the safe and responsible use of artificial intelligence as part of our wider commitment to online safety, filtering and monitoring.

The College ensures that any Generative AI products effectively and reliably prevent access to harmful and inappropriate content by pupils by:

- integrating the highest standards of filtering possible within the product, and
- using additional filtering solutions that work on top of an AI product.

The College recognises the specific risks associated with artificial intelligence and has developed a dedicated AI policy for use within the school. This policy aligns with the Department for Education's guidance on generative AI, including the published product safety expectations, and outlines how filtering and monitoring requirements apply to the safe and responsible use of generative AI in an educational setting.

Further guidance can be found in the **AI policy**, E-safety Policy for Staff and ICT Acceptable Use and E-safety for Students (includes mobile phones).

Children who are Missing from Education

Children Missing Education

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

Analysis of attendance data and liaison with parents takes place regularly in order to reduce the risk of children missing education in the future. A child going missing from education is also a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation, exposure to extremist ideology or radicalisation, forced marriage or FGM.

The Admissions Office ensure that new students are added to the School Roll on arrival and onto the MIS system. Attendance is then monitored and where issues arise, parents and the local authorities are notified as appropriate.

When students leave the school, they are removed from the Roll and the local authorities are notified with their intended destination. Unexplained or prolonged/persistent absences are followed up via phone calls and if contact cannot be made, the local authorities are informed and welfare checks completed. As far as possible (except in our early years setting), we hold more than one emergency contact number for each pupil, so that contact is facilitated. In our early years setting, where possible the setting should hold more than two emergency contacts numbers for each child.

The school works closely with local authority children's services and follows statutory guidance, including Working Together to Improve School Attendance and Children Missing Education.

Please also see the Student Attendance and Punctuality Policy for further detail.

Mental health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL or DDSL.

Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

Domestic Abuse

Domestic abuse can be, but is not limited to, psychological, physical, sexual, economic, coercive financial, emotional and controlling behaviour. 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). All of which can have a detrimental and long-term impact on their 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 College liaises with the Police and other agencies in cases of domestic abuse to support the students concerned.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children.

Children with family members in prison

Hundreds of thousands of children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

Modern Slavery and the National Referral Mechanism

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

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL (or DDSL), should consider referring into the Cyber Choices programme.

Homelessness

Homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. Students over the age of 18 in this situation should be given as much support as possible.

Special educational needs and/or disabilities (SEND), or pupils with certain health conditions Pupils with SEND or certain health conditions can face additional safeguarding challenges and may not outwardly show signs of abuse and/or may have difficulties in communication about abuse, neglect, exploitation or bullying. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;

- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate

Children who are Lesbian, Gay, Bisexual, or Gender questioning

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

When supporting a gender questioning child, a cautious approach is taken and consideration of the broad range of their individual needs, including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying and potential SEND. This is done in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child). Staff endeavour to reduce additional barriers faced and encourage students to speak about any concerns related to gender questioning or sexuality.

Section 7 Child-on-child Allegations (including child on child sexual violence and harassment)

All staff must be aware that safeguarding issues can manifest themselves via child-on-child abuse. Child on child abuse is abuse by one or more children against another child. This is most likely to include, but not limited to: bullying (including cyber bullying, prejudice based and discriminatory bullying), physical abuse (including hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm), sexual abuse including in intimate personal relationships, verbal abuse e.g. racist, sexist or homophobic remarks, threats or name-calling; and emotional abuse e.g. isolating an individual from activities and social acceptance of the peer group, sexual violence/harassment, causing engagement in sexual activity without consent (such as forcing someone to strip, touch themselves sexually or engage in sexual activity with a third party), consensual/non-consensual sharing of images, upskirting and initiation or hazing type violence.

It may include an online element which facilitates, threatens or encourages abuse. Both perpetrators and victims can be of either gender (although it is statistically more likely that girls will be victims and boys perpetrators), and child-on-child abuse can be stand alone or as part of wider abuse and can happen both inside and outside school, and online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. All incidents will be treated equally seriously and the arrangements below apply to all reports and concerns of child on child abuse.

SEND students or those with certain health conditions or vulnerabilities are more prone to child-on-child abuse, bullying (including prejudice-based bullying) and isolation than other children and may face additional barriers in reporting an incident. There is the potential for these students to be disproportionately affected without showing outward signs and communication barriers/difficulties can exist in managing/reporting these incidents.

In any school, it is important to remember that even with no cases of child-on-child abuse, it may still be taking place and is not being reported.

Upskirting typically involves taking a picture or video under a person's clothing without their knowledge, with the intention of viewing their genitals or buttocks for sexual gratification or to cause the victim distress or humiliation. Victims may be male or female, adults or children. This is now a criminal offence, as is the taking or sharing of nude photographs of people under eighteen.

Staff must be clear that the activities above are unacceptable and not to be tolerated, or passed off as "banter", "just having a laugh", "boys being boys" or "part of growing up", They are instead to be investigated fully and responded to befitting the nature and seriousness of the abuse as part of a zero-tolerance approach to abuse.

It is the responsibility of all staff to help prevent and respond to child-on-child abuse in line with school policy. All staff are therefore given training to respond appropriately, manage effectively and report sexual violence or sexual harassment. Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the procedures

below rather than the College's Anti-Bullying and Behaviour policies. Students are made aware that this form of abuse can have legal consequences. In order to minimise child-on-child abuse, staff and students are educated directly and indirectly through the school ethos, Pastoral Programme and counter-bullying measures.

The College recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

These arrangements apply to all reports and concerns of child on child abuse, whether they have happened in school or outside of it, and/or online.

In dealing with abuse by one or more student against another student (and where appropriate) staff are trained to:

a) Respond immediately and directly, with the explanation as to why this type of behaviour is not acceptable.
b) Inform the DSL, via a write-up on CPOMS, and follow the referral process as per Flowchart 1 of this document. If in any doubt, speak with the DSL.
c) Encourage all students to talk to or confide in a member of staff about any instances that make them feel uncomfortable or threatened.
d) Reassure victims that they are being taken seriously, and will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or harassment.
e) Respect confidentiality where appropriate. However, the child is informed that it may be necessary to disclose the information to other people in order that appropriate action can be taken.
f) Ensure that children should know that making staff aware of a problem is not 'sneaking' or 'telling tales' etc. and should be reassured that they are not being disloyal to their peers.
g) Always discourage retaliation.
h) Where appropriate, inform parents and put in place appropriate disciplinary proceedings.
i) Monitor those involved (perpetrator, victim and any others) and check periodically to ensure that all are being supported and the abusive situation has not returned to in any respect.

A student against whom an allegation of abuse has been made may be suspended from the school during the investigation. The College will take advice from the Hertfordshire Safeguarding Children Partnership on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged victim and perpetrator(s). If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, the school will ensure that, subject to the advice of the Hertfordshire Safeguarding Children Partnership, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important

consideration for the school and advice will be sought as necessary from Hertfordshire Safeguarding Children Partnership and/ or the police as appropriate. The College will have regard to the procedures set out in *KCSIE* at all times.

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL or DDSL who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principle that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care and whether a crime has been committed will be decided on by the Police. Ultimately, the DSL or DDSL will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the College will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with Hertfordshire Safeguarding Children Partnership referral process.

The College's approach to sexting can be found on page 42 in the section relating to the sharing of nude and semi-nude images.

The College will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes" (March 2024) when responding to an allegation that nudes and/or semi-nudes have been shared.

In the event of disclosures about child on child abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the pastoral team and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the school especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that

they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The College will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them. The College will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The College acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises (including during any before or after school-based activities), and school transport. The school will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

The College will consider intra familial harms and whether any support for siblings is necessary following an incident. The College will keep a written record of all concerns, discussions and decisions made on CPOMS.

The College will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic of inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the school's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the College will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded 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 social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head or Deputy will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the College's behaviour policy.

Section 8 Procedures for dealing with concerns about a child

***REMEMBER**: The determination as to whether or not abuse has taken place is a task for the professional child protection agencies, following a referral from the DSL. However, all staff must understand their responsibility to act immediately if they have any concern for the welfare of a child.*

The College has a duty to consider at all times the best interests of the student and take action to enable all students to achieve the best outcomes. Everyone who comes into contact with children and their families has a role to play in safeguarding children. Safeguarding and promoting the welfare of children is everyone's responsibility. The College adopts a 'whole school' approach to safeguarding. This means involving everyone in the school, and ensuring that, safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. School staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating.Staff work with social care, the police, health services and other services to promote the welfare of children and protect them from harm, including providing as much information as possible as part of referral processes.

Staff must also understand that this responsibility applies not only to children at risk of significant harm but to those considered to be a "child in need". Such a child needs support to maintain a reasonable level of health or development, and prevent problems escalating. Options include early help assessment, pastoral support and referral to children's social care, depending on the situation. Where there is an immediate concern, all staff are empowered to act.

Staff must understand that they are under a legal duty:

a. To protect children from abuse and promote their welfare.
b. To be aware of the possibilities which exist for child abuse and to be conversant with the College's practice and policy on child protection and adopt an "it could happen here" approach.
c. To be trained in child protection procedures through appropriate induction training and regular refresher training.
d. To know how to access and implement the College guidance and procedures, independently if necessary.
e. To not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe.
f. To record information, contemporaneously, verbatim, if possible. Not to prompt, lead or suggest information to the child.
g. If they suspect or hear any allegation or complaint of abuse, exploitation or neglect from a child or third party, to act immediately and following the relevant procedure below.. In the case of allegations brought against a colleague to refer this to the Headmaster immediately, who then informs the LADO/Designated Officer; In the case of the allegation being made against the Headmaster, the Chair or Safeguarding Governor must be informed immediately, who then informs the LADO/Designated Officer.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* (May 2024) supports staff who have to make decisions about sharing information. The governors recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the College and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under the Data Protection Act 2018 and the UK General Data Protection Regulation must not be allowed to stand in the way of safeguarding and promoting the welfare of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the DSL.

The governors will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child at risk
- not providing students' personal data where the serious harm test is met.

All child protection/safeguarding concerns, discussions, decisions made and the reasons for those decisions and any outcomes must be recorded on the CPOMS online system. This includes instances where referrals were or were not made to another agency, such as children's social care or the Prevent programme. This will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of *KCSIE*. **Staff should discuss with the DSLs if in any doubt about the recording requirements.**

Where there is a safeguarding concern, the College will ensure the student's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The College manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The College implements a child-centred approach to safeguarding. Whilst the College is committed to working collaboratively, and in partnership, with parents and carers as far as possible the wishes

and feelings of the child and what is in their best interest is always central to the College's decision-making process.

What to do on receipt of a report from a student

Receive Information

1. The initial response by a school to a report from a child is incredibly important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.
2. If possible, manage reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy).
3. Listen carefully without reaction, reflecting back, using the language of the child, particularly without displaying shock or disbelief or expressing judgment. To do so could affect the child and prevent the disclosure of information.
4. Determine how best to build trusted relationships with children and young people which facilitate communication
5. Be careful when considering cases that involve an online element. The key consideration is for staff not to view or forward illegal images of a child.

Reassure The Child

1. Acknowledge the child's courage and strength in deciding to disclose the information. The step of disclosure is in itself often the most difficult for a young person to take and will have been the subject of a great deal of thought before being anywhere near confident of doing so.
2. Remind them that they are not to blame for what is happening: the child is the victim and often has a very low self-esteem because of this. However, do remember that the alleged perpetrator is often a person that the child loves and respects so to criticise their conduct will be counter-productive. It is vitally important to suspend any form of judgement.
3. Reassure the student that the allegation/complaint will be taken seriously and that they will be supported and kept safe. Ensure that the student is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
4. **Do not promise confidentiality**: given that the safety of the child is paramount, a member of staff cannot give the cast-iron assurance that the information presented does not need agency investigation. To offer such a commitment and to renege on it would break the trust between the student and the school. This would become a complicating factor in having to work with the parents and children at a later date should abuse be proven. Explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.
5. Be aware that the student may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns.
6. Do not promise that everything will be all right. This obviously may not be true and to heighten expectations can be as devastating as to the outcome of the allegations.

React and Observe

This is the most skilled part of the initial disclosure of allegation:

1. Respond to what the student has said but do not interrogate. Avoid asking leading questions such as: "Was it your father?" "Did this take place on Tuesday when you were away?" Defence counsel in a potential subsequent court case may use this to show that the staff member "contaminated" the child's evidence by posing questions in this way.
2. Questions must be open ended e.g. "Do you want to tell me anything else?"
   And? Who did this? When was this? How did it happen? Any other things you want to tell me?
3. Could you go over the detail again to see if you have forgotten anything?
4. Observe the student's behaviour.

TED questions can be usefully applied.

T = tell me what happened

E = Explain to me what happened

D = Describe to me what happened

Never ask WHY.

Reflect/seek clarification as outlined in the last question. If the situation allows this at all it will be helpful in enabling you to decide whether this is a child protection issue or not e.g. "Can I be clear about the detail of what you are saying?"

There is a careful judgement to be made in ensuring that you have enough information to make an appropriate referral and allowing a young person to talk without being silenced, whilst making sure that you do not inadvertently lead the child, perhaps by assumption and unintentionally, by the nature of the question. For example, asking: "Were you sitting up or lying down when this happened?" contains the answer to the question. "What was the position you were in?" allows the information to unfold.

Explain

What you intend to do next. This must focus on the process the College adopts and contacting the designated person within the school.

Record

- Make notes where possible. However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. A full write up must be done as soon as possible after the meeting and within one hour of the disclosure.
- Write up your notes in full on CPOMS. Use the exact words of the child (The Child's Voice) as much as possible. Note the questions you may have asked with the response under them. Describe observable behaviours (physical agitation, crying, silences) etc.
- Share with the DSLs and relevant key staff (HoH, nurse etc)
- Do not include personal opinions.

The use of corporal punishment is strictly prohibited and will result in disciplinary action

What staff should do if they have concerns about a child

If staff (including governors, supply staff, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the DSL to agree a course of action, although staff can make a direct referral to children's social care.

As set out above, staff should not assume that somebody else will take action and share information that might be critical to keep a child safe; they should maintain an attitude of "it could happen here". If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

Staff must understand that they may be required to support other agencies and professionals in an early help assessment. This responsibility may involve liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment. Such early help assessments, such as the Families First Assessment and Children Services referral forms, should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment.

It must be remembered that data protection law is not a barrier to information sharing for the purpose of keeping children safe.

What staff should do if a child is in danger or at risk of harm

If staff (including governors, supply staff, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. All staff know that any person can make a direct referral, using the contact details in Appendix 2 of this document.

In exceptional circumstances where a DSL is not available, appropriate action should not be delayed. Staff members making a referral should consider speaking to a member of CLT or take advice from local children's social care. Any action taken should be shared with the DSL as soon as practically possible. All staff are clear that they are empowered to refer if necessary. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate Further, if after a referral, a child's situation does not appear to be improving, the staff member with concerns should press for re-consideration either

through the agency or the DSL or by further contact personally with social services. Concerns should always lead to help for the child at some point. Providing early help is more effective in promoting the welfare of children than reacting later.

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

A full copy of Hertfordshire Safeguarding Children Partnership local procedures can be found on their website Hertfordshire Safeguarding Children Partnership | Hertfordshire County Council.

What staff should do if a child is seen as at risk of radicalisation

Staff should follow the College's normal referral processes when there are concerns about children who may be susceptible to radicalisation into terrorism. This may include a Prevent referral or referral to children's social care depending on the level of risk; email prevent@hertfordshire.gov.uk for advice, call 0800 789 321 (anti-terrorist hotline) or contact Crime Stoppers on 0900 555111. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism. Advice and support can also be sought from children's social care.

The College, in recognition that students may be susceptible to being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the police) which assess how their learners or staff may be at risk of being radicalised into terrorism, including online. Such risk assessments are discussed with the Head, DSL and DDSLs to ensure the College's safeguarding arrangements are sufficiently robust to ensure that those at risk of radicalisation are identified and appropriate support is provided and is regularly revised as needed.

What staff should do if they discover an act of FGM

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL or DDSL who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care.

There is a statutory duty on teachers to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a student over 18, teachers should follow the College's local safeguarding procedures.

What staff should do if they have concerns that children are at risk from or involved with serious violent crime

All staff should be aware of the indicators which may signal that children are at risk from or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the DSL to agree a course of action, although staff can make a direct referral to children's social care.

How should staff respond to an incident of nudes and semi-nudes being shared by students

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by persons under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

Many professionals may refer to 'nudes and semi-nudes' as:

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

Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

Terms such as ‘deep fakes’ and ‘deep nudes’ may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes. Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a student or of a student, they should refer the incident to the DSL as soon as possible. The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (March 2024) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the student unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children’s social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process.

An immediate referral to police and/or children’s social care through the MASH or equivalent will be made if any of the following points apply:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- The images or videos suggests the content depicts sexual acts which are unusual for the young person’s developmental stage or are violent.
- The images involves sexual acts and any child or young person in the images or videos is under 13.
- There is reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming.

If none of the above apply, the College may decide to respond to the incident without involving the police or children’s social care. All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. The decision to respond to an incident without involving the police or children’s social care will only be made in cases where the DSL (or equivalent) is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the College’s pastoral support and disciplinary

framework. Any decision in this regard will be made by the DSL (or equivalent) with input from the Head. The decision will be made and recorded in line with this policy and will be based on consideration of the best interests of any child or young person involved. Any decision will take into account proportionality as well as the welfare and protection of any child or young person. The decision will be reviewed throughout the process of responding to the incident. If doubts remain local safeguarding arrangements will be followed.

This guidance does not apply to the sharing of images of persons under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

What staff should do if a child is absent from education

Children who are absent from education particularly on repeat occasions and/or for prolonged periods, and children missing education can act as a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is important that the College's response to persistently absent students and children missing education supports identifying such abuse, and in the case of absent students, helps prevent the risk of them becoming a child missing education in the future.

The College's procedures for unauthorised absence and for dealing with children who are absent, repeatedly and/or for prolonged periods, and children missing from education are outlined in the Student Attendance and Punctuality Policy.

Where reasonably possible, the College will hold more than one emergency contact number for each student to provide the school with additional options to make contact with a responsible adult particularly when a child who is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safeguarding concern.

The College will report to the Local Authority, at such intervals as are agreed between the College and the local authority, a student who fails to attend school regularly or has been absent from school without the College's permission for a continuous period of 10 school days or more.

When working with local authority children's services where school absence indicates safeguarding concerns the school will have regard to the statutory DfE guidance *'Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (August 2024)* and to the EYFS Statutory Framework for children aged 0-5 years.

What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect, exploitation and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

What staff should do if a child requires mental health support

The College has an important role to play in supporting the mental health and wellbeing of its students. 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 can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE *Mental Health and Behaviour in Schools* guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing, and resilience among young people.

What staff should do if they have safeguarding concerns about another staff member (Whistleblowing)

If staff have safeguarding concerns about another staff member (including supply staff, agency staff, volunteers and contractors), then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, agency staff, volunteers, and contractors) and refer the matter directly to the designated officer(s) at Hertfordshire local authority.

What staff should do it they have concerns about safeguarding practices in the College

All staff and volunteers must feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding regime and that such concerns are taken seriously by the College Leadership Team. Where staff have concerns about poor or unsafe practices and potential failures in the school's safeguarding systems, these should be raised with the DSL and recorded and in accordance with the College's whistleblowing procedures. The DSL will raise the concern at Leadership level for discussion. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith. The staff member must feel confident that when this happens a formal response is communicated within a reasonable time scale. If a staff member feels that the response is not forthcoming within a reasonable time scale the matter is to be raised with the Head for response.

If staff and volunteers feel unable to raise an issue with the school or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line.

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the College and can occur between children outside school. All staff, but especially the DSL and DDSLs, should consider the context within which such incidents and/or behaviours occur. The College will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The College will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

Section 9 Allegations Against College Staff (including supply staff volunteers and contractors) or Organisations and Individuals using College premises.

All staff have a role in creating and ensuring a culture of openness, trust, and transparency within the College. Sharing information ensures the College values and expected behaviours are lived out day-to-day by the whole community.

Allegations against members of staff (including supply staff, volunteers and contractors) must be treated with the same professional regard as those made against others. It is recognised that abuse does take place in the context of schools and staff are encouraged to have a "it could happen here" approach.

Where allegations are made, staff should have confidence that allegations will be carefully and fairly investigated according to clearly set out procedures. Staff should always bear in mind the Staff Code of Safe Conduct in relation to interactions with pupils.

In addition, staff should understand that, under the Sexual Offences Act 2008, it is an offence for a person over the age of 18 to have a sexual relationship with a person under 18, even if the relationship is consensual. This means that any sexual activity between a member of school staff and a pupil may be a criminal offence, even if the pupil is over the age of consent. Furthermore, a sexual relationship with any pupil is likely to fall within the definition of abuse of trust, leading to the most serious disciplinary action.

Managing Allegations that meet the Harm threshold.

Section one of Part 4 of KCSIE 2025 should be followed where it is alleged that anyone working in the school or a college that provides education for persons under 18 years of age, including supply teachers, volunteers and contractors 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.

In this section reference to 'allegations' also covers concerns. Allegations that do <u>not</u> meet the above harm threshold should be dealt with using the College's procedure for handling low level concerns set out below. Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police.

Managing accusations of abuse against staff members, including volunteers, supply staff and contractors which meet the harm threshold, is the sole responsibility of the Head and not the DSL. If

the allegation is against the Head, the matter must be taken directly to the Chair of Governors/Safeguarding Governor who will liaise with the local authority and/or partner agencies. **This must happen without informing the Head**. The Chair of Governors can be contacted via his/her College email address at Elliott.b@stcolumbascollege.org. If reporting an allegation to the Head or school proprietors could create a conflict of interest, the allegation must be made directly to the local authority designated officer. If the allegation is levelled at the DSL, this must be reported to the Head immediately. In any case, the DBS and TRA will be informed as appropriate.

There are two aspects to consider when an allegation is made:

1. the welfare and rights of the child
2. Investigating and supporting the person subject to the allegation

For this reason, if an allegation is made against anyone working with children in the College, before contacting the LADO, the College will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The College should not undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations.

When dealing with an allegation about a staff member the College will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

1. Allegations which appear to meet the above reporting criteria are to be reported straight away to the 'Designated Officer' who is the Head. Where the Head is absent or is the subject of the allegation, reports should be made to the Chair of Governors. Where the Head is the subject of the allegation, the Head must not be informed of the allegation prior to contact with the Chair of Governors and LADO. However, staff may consider discussing any concerns/allegations with the DSL and make may any referral via them.

2. The Designated Officer should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. (Where the Designated Officer' deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and as appropriate the police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the school's attention and appear to meet the criteria or that are made directly to the police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.

3. Where the Designated Officer is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.

4. When to inform the individual who is the subject of the allegation will be considered on a case-by-case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the Designated Officer will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The Designated Officer will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

5. The Designated Officer should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the school or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:

   - redeployment within the school 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 to alternative work in the school so the individual does not have unsupervised access to children.
   - moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
   - temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

   These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

   Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the school is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The Designated Officer will give due weight to the views of the LADO, *WT* and *KCSIE* when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the Designated Officer will confirm the decision within one working day and will ensure they know who their point of contact is in the school and shall provide them with their contact details. The Designated Officer will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

6. Where further enquiries are required to enable a decision about how to proceed, the LADO and Designated Officer should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the school to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the school. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.

7. The Designated Officer will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.

8. The Designated Officer will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

9. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.

10. The Designated Officer will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the College ceases to use their services, or the person resigns or otherwise ceases to provide their services. The school has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the school must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

11. On conclusion of the case, the Designated Officer should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the school's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the Designated Officer (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable

adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the school will make a referral to the DBS.

The College has a duty of care to its staff, and whilst the welfare of a child is paramount, the school must offer appropriate welfare support to the adult subject to the investigation and potentially their family The College will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the Designated Officer and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. All records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer. Records should be reviewed at the end of the retention period in case it is necessary to keep it for longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should 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 social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the College's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

Procedure for managing and allegations about supply teachers and contractors

The College's procedures for managing allegations against staff above also apply to staff not directly employed by the school, for example, supply teachers provided by an employment agency or business ('the agency'). The College will usually take the lead, but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The College will discuss with the agency (or agencies where the supply teacher is working across a

number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The College will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

When using an agency, the school should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left the College first, the College must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

Dealing with safeguarding concerns and allegations about organisations and individuals using College premises

The College may receive an allegation or concern relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the school will follow their safeguarding policy and procedures, including informing the LADO.

When services or activities at the College are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the school, the College will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the school will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. The College will expect, where appropriate, providers to fully comply with the DfE guidance *After school clubs, community activities, and tuition (safeguarding guidance for providers) (September 2023)* and will seek assurance in this regard.

The College has arrangements in place for the use of school premises for non-school activities including the availability of the DSL or DDSL and how they can be contacted.

Low Level concerns (concerns/allegations that do not meet the harm threshold)

A low-level concern is any concern 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 LADO.

Section two of Part 4 of KCSIE 2025 will apply in relation to concerns or allegations which do not meet the harm threshold. In order to promote an open and transparent culture in which all concerns about adults working in or on behalf of the College are raised and addressed appropriately, staff are encouraged to share any concerns they may have, however minor they may seem. Creating a culture in which such concerns are shared responsibly with the appropriate person, recorded clearly and dealt with proportionately is essential. If implemented effectively, this approach supports the early identification of inappropriate, problematic or concerning behaviour, helps to minimise the risk of abuse, and ensures that all adults working in or on behalf of the College understand and operate within clear professional boundaries and in accordance with the College's ethos and values.

Such behaviour may sit on a wide spectrum. It may be inadvertent or thoughtless, or behaviour that appears inappropriate but may not be in specific circumstances, through to conduct that may indicate an intention to cause harm.

Concerns which do not meet the harm threshold are still considered important. Examples may include the use of inappropriate language, unprofessional conduct, over-familiarity with pupils or showing favouritism.

Low level concerns may come to light in a number of ways, including observations, disclosures by a pupil, parent or another adult, complaints, or through information gathered during vetting checks.

Staff are required to report low level concerns using the online form, which is received by the Head and Deputy Head (Senior). Where there is any indication that the concern may meet the harm threshold, a decision will be made by the Head as to next steps, including whether referral to the LADO is required. Concerns are reported to the same person (Head) responsible for receiving concerns that meet the harm threshold, to ensure a consistent approach and to support the maintenance of professional boundaries across the College. If the College is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult with the LADO and take a more collaborate decision-making approach.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the Head will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

All concerns will be handled in a sensitive and proportionate manner, with the aim of improving safeguarding practice and supporting individuals to reflect on and adjust their behaviour where appropriate. The Deputy Head (Senior) or another nominated member of the College Leadership Team will gather as much relevant information as possible, including, where appropriate, speaking with the person who raised the concern, the individual concerned and any relevant witnesses.

All concerns will be recorded, including details of the concern, the context in which it arose, and any action taken. The name of the person reporting the concern will be noted, with respect for their wish to remain anonymous where possible. Records will be stored securely and treated confidentially. Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

The College will address unprofessional behaviour at an early stage and will support the individual to correct it.

Records will be reviewed regularly by the Head and relevant members of the College Leadership Team in order to identify any patterns of behaviour which may require further action, including disciplinary procedures or referral to external agencies where the harm threshold is met. Records may also be reviewed to identify any wider cultural issues that can be addressed through staff training or policy review.

Where low level concerns relate to supply staff or contractors, the concern will be shared with their employer to support the identification of any recurring concerns across different settings. Ensuring low level concerns are reported and responded to effectively also serves to protect staff from potential false concerns or misunderstandings.

Section 10 Out of Hours Providers and External Lettings

The College recognises that there needs to be due regard for safeguarding when contractors or out of hours providers are using the College site. Therefore, for the use of College premises for non-College activities we expect providers to comply with the guidance on Keeping children safe in out-of-schools settings which includes;

a) We will undertake background checks on the provider and ensure they are compliant with College safeguarding procedures, such as reporting safeguarding incidents and signing in procedures.
    a. External hirers will report any concerns via email to the DSL and the Lettings Coordinator at the earliest opportunity.
    b. The DSL will then follow up as with any safeguarding allegation.
    c. The Lettings Coordinator or a trained member of staff is on site and available to assist external hirers.
    d. School staff are aware of lettings with reference to the Outlook calendar.
b) We will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place and, where necessary, inspect them.
c) The Lettings Coordinator will liaise with all external hiring organisations to ensure they are aware of our conditions for hire and safeguarding procedures. This will be included in any lease or hire agreement, as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.
d) We will provide copies of College safeguarding policies to groups hiring facilities at the school, including: procedures for reporting concerns about staff; health and safety information and DSL contact details and a referral route for informing social care.
e) The Head of Estates will liaise with all contractors in relation to relevant safeguarding requirements.
f) The Lettings Coordinator will liaise with internal bookings, such parent and staff groups, to ensure they understand their responsibilities and are compliant with safeguarding procedures.
g) This applies regardless of whether or not the children who attend any of these services or activities are children on the College roll.

As with any safeguarding allegation, the safeguarding policies and procedures, including informing the LADO, apply when made against organisations or individuals using school premises.

Section 11 Other Safeguarding Responsibilities

Safer Recruitment

Appropriate recruitment and selection procedures for staff (including part-time staff, temporary and supply staff, and visiting staff) in the context of safeguarding are the first line in protection of children and have been adopted fully by the College. Please see the **Safer Recruitment Policy** for more information. The College's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised and are set out in the Safer Recruitment Policy]. The College's procedures for managing contractors attending the school site can also be found in the Safer Recruitment Policy

The College ensures all potential new staff are subject to a "digital screening" process prior to interview. They are informed of this when shortlisted.

Relationships and Sex Education

The College understands that children and young people need knowledge and skills that will enable them to make informed and ethical decisions about their wellbeing, health and relationships.

The RSE curriculum is delivered as part of a whole school approach to wellbeing and positive relationships that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic, and sexual violence/harassment. The College focusses on building positive attitudes and skills, promoting healthy norms about relationships, including sexual relationships where relevant, and about health, including mental health. The College recognises that discussions about sensitive topics in RSE can lead to increased safeguarding reports. All staff know what to do if they have concerns that a student is being neglected or abused, including those who have seen, heard or experienced the effects of domestic abuse.

The RSE Policy sets out the curriculum content, how and when it will be taught, and who is responsible for teaching it, including any external providers the school will use. The College proactively engages and consults parents in the development and review of this policy.

Looked after children

The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

Joseph Tatham (Deputy Designated Safeguarding Lead) is the designated member of staff who has responsibility for their welfare and progress. The College ensures that the designated member of staff receives appropriate training in order to carry out their role.

Arrangements for visiting speakers

The College has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable The College's responsibility to pupils is to ensure that they can critically assess the

information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the school and the British values of democracy.

The College will undertake a due diligence before agreeing to a Visiting Speaker being allowed to attend the school. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the College may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the school site, will be supervised by a school employee. ID will be checked to confirm their identity. All speakers will sign in and out and must wear the visitor lanyard which includes their name and picture of themselves. On the back of these lanyards is safeguarding information.

Arrangements for use of school premises for non-school activities

When services or activities at the College are provided under the direct supervision or management of school staff, this policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of the College, the College will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the school will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the College on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

The College will ensure that the DSL or DDSL can be contacted and/or is available at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll.

The DSL/DDSL can be contacted via email and via the online form on the website (Report a Safeguarding Concern - St Columba's College). At all times there is a member of school staff present during non-school activities who has the contact details for the DSL/DDSL.

Any person/s hiring the school premises has signed off on the school safeguarding policy (and will do this annually).

DSL/DDSL contact details are visible in adult toilets and public areas and are given to all relevant users.

The College will ensure that safeguarding requirements are included in any agreement for use of the school premises (such as a lease or hire agreement) as a condition of use and occupation of the

premises and that failure to do so by the provider to comply with this will lead to termination of the agreement.

This is covered in the letting agreement and is clearly stated in the Hire Agreement.

When considering the safeguarding arrangements any providers have in place the College will have regard to the DfE's non statutory guidance *'After school clubs, community activities, and tuition (safeguarding guidance for providers)' (September 2023)*.

Appendix 1 Professional Guidance Contacts

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example the TES, MindEd and the NSPCC websites. Staff can access government guidance as required on the issues listed below via GOV.UK and other government websites:

KCSIE 2025 has numerous links on p163 signposting help. These links are intended to assist professionals, students, and parents/carers.

Some of the Key links are here.

- Bullying including prevention, cyberbullying and parental advice
- Child Abuse. Concerns and advice for practitioners
- Children missing education - guidance – and Annex B
- Children who run away from home or care. Guidance and responsibilities.
- Child sexual exploitation – and Annex B
- County lines and criminal exploitation toolkit for professionals
- Domestic violence. How to recognise it and get help.
- Drugs. Advice for schools
- Educate Against Hate. How to safeguard, build resilience and promote shared values
- Fabricated or Induced Illness
- Child abuse linked to faith or belief
- Female genital mutilation (FGM). Statutory guidance – and Annex B
- Forced marriage- and Annex B
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Harmful online challenges and hoaxes
- Mental health and behaviour in schools
- Missing children and adults strategy
- Children Act 1989 and private fostering
- Preventing radicalisation – and Annex B
- Teenage relationship abuse
- SEND NSPCC links- Safeguarding children with special educational needs and disabilities (SEND) and NSPCC - Safeguarding child protection/deaf and disabled children and young people
- Sexual abuse support
- Sexual violence and sexual harassment between children in school and colleges
- Sexting and controlling behaviour
- Safeguarding children who may have been trafficked
- Gangs and youth violence
- Out-of-school settings: safeguarding guidance for providers
- Home - Shore. A safe space for teenagers worried about sexual violence

Appendix 2 - Safe Guarding Contacts Register

Herts Local Authority Listing of National Contacts

To ensure most current contact information please check against this register by clicking through to tri.x National Contacts (proceduresonline.com). Some of the most relevant are linked below (CTRL click)

1. CAFCASS (Children and Family Court Advisory and Support Service)
2. CAMHS (Child and Adolescent Mental Health Services)
3. Channel and Prevent Multi-Agency Panel (PMAP) guidance
4. Children's Services
5. Children Missing Education Team | Hertfordshire County Council
6. Children's Services Out of Hours Service (SOOHS) - Hertfordshire Grid for Learning
7. County Lead Behaviour and Attendance
8. CRI Crime Reduction Initiative
9. Customer Service Centre (CSC)
10. Child Protection Conference Reports
11. Hertfordshire Domestic Violence Abuse
12. Hertfordshire E-Safety Advisor
13. Hertfordshire Safeguarding Children Partnership HSCP
14. Independent & Private Schools
15. Joint Child Protection Investigation Team (JCPIT)
16. Designated Officer - LADO
17. NHS Trust Designated Doctor and Designated Nurse Safeguarding Children
18. NSPCC
19. Ofsted - GOV.UK
20. Parent Partnership Hertfordshire
21. Police
22. Probation and Bench
23. Substance Misuse Teams/Community Drugs Team

Clear Risk of Concern (Immediate Need)
Children's Services: Safeguarding and Specialist Services 0300 123 4043
CAFCASS (Children and Family Court Advisory and Support Services
Local Office: Stevenage Address: Bayley House Sish Lane Stevenage SG1 3SS Office Telephone Number: 0300 456 4000 CAFCASS website https://www.cafcass.gov.uk/
CAMHS Child and Adolescent Mental Health Services
Tel: 0300 123 4040

Hertfordshire County Council website
CHANNEL Mogo
CHANNEL Mogo website www.channelmogo.org
Children's Services
Director of Children's Services Jo Fisher **County Lead Behaviour and Attendance** attendancedutywest@hertfordshire.gov.uk 01442 454778 **Children's Services Customer Service Centre** Tel: 0300 123 4043 From May 2024, all referrals from professionals are via the online referral portal. Visit the HCC website: Report concerns about a child or request support. Out of regular working hours (Mon-Fri, 09:00-17:30) contact the Hertfordshire Children's Services phoneline - 0300 123 4043
Child Missing In Education (Departures from SCC)
Children Missing Education Support Officer to Central Attendance and Employment Support Team (8.30 am to 4.00 pm Monday to Friday) Jacqui Ellis 01442 454778 The CME manager is Mario Demetriou who has strategic and operational responsibility for this cohort. Mario can be contacted by email mario.demetriou1@hertfordshire.gov.uk Use the form on the link below if you think you know of any children who are missing from education. Please send the completed form directly to csf.cme@hertfordshire.gov.uk
Children's Services Out of Hours (SOOHS)
Tel: 0300 123 4043 (out of hours) Specially trained reception staff are on hand to deal with all calls from 8am to 8pm Monday to Friday and 9am to 4pm on Saturdays (except public holidays). Outside these times, calls are automatically diverted (except textphone/minicom, callers need to redial 01992 632150) to an agency, who can contact the SOOHS on your behalf.
CRI (Crime Reduction Initiative)
Drug and alcohol recovery service **Contact: The Living Room 0300 3650304**
Child Protection Consultation Hub 01438 737511 **Paula Hayden 01992 556710**
The Child Protection processes all enquiries regarding children's social care and directs these enquiries on to either the Targeted Advice Service (TAS), a multi-agency team which provides support with early intervention for children, or the relevant Specialist or Safeguarding Social Care Team. The following arrangements for enquiries and referrals are in place: All referrals to children's social care should continue being made using a Single Service Request (SSR) form, and where possible submitted electronically. Forms can be accessed via the **Hertfordshire County Council website**. All urgent referrals should be followed up with a phone call using the Children's Services numbers listed above.

• Electronic referrals and enquiries should be sent via • **protectedreferrals.cs@hertfordshire.gov.uk** *(only to be used for referrals by professionals)*. • Letters sent to: Customer Service Centre, PO Box 153, Stevenage, SG1 2GH. • **If you suspect that a child may be subject to immediate risk of harm through abuse or neglect, you should still contact the police (999), Children's Services on 0300 123 4043 and/or the Joint Child Protection Investigation Team (JCPIT) on 01707 355927/01438 757330**
Child Protection Conference reports
The following generic addresses should now be used for the submission of reports to any child protection conference: Secure address: Cpc.reports@hertscc.gov.uk Non-secure (password protect the document and send a separate e-mail with the password contained in the body of the e-mail): Childprotection.unit@hertfordshire.gov.uk All reports will be retained.
Hertfordshire Domestic Violence/Abuse Line
Information and advice line: 08 088 088 08 Herts Sunflower - Domestic Abuse website
Hertfordshire E-Safety Advisor
Herts E-Safety Advisor info@hertsforlearning.co.uk 01438 845111
Hertfordshire Family Information Service
Call: 0300 123 4052 Monday to Friday, 8.30am to 20.00pm from anywhere in Hertfordshire for the cost of a local call (minicom number: 0300 123 4041). Herts Direct website (FIS) Email: fis@hertfordshire.gov.uk
Hertfordshire Safeguarding Children's Partnership
HSCP Farnham House Stevenage Herts Tel: 01992 588757 Website: https://www.hertfordshire.gov.uk/services/childrens-social-care/child-protection/hertfordshire-safeguarding-children-partnership/hscp.aspx
ISI (Independent School Inspectorate) Safeguarding Lead
Department for Education website ISI Safeguarding 0207 600 0100
Joint Child Protection Investigation Team (JCPIT) 01707 354 000
Joint Child Protection Investigation Team (JCPIT) is a specialist team with countywide responsibility for undertaking child protection investigations.
Designated Officer (formerly known as DESIGNATED OFFICER)
Tel: 01992 556936 01992 555420 Work on a duty rota, call Secretary to be advised of daily duty officer
Designated Doctors and Designated Nurse Safeguarding Children

Designated Doctor Peace Children's Centre Peace Prospect Watford WD17 3EW Tel: 01923 470 606 Dr Olive Hayes QC262 Howlands Clinic New QE11 Hospital Welwyn Garden City AL7 4HQ Tel: 01438 288342 **Designated Nurse Safeguarding Children**: Jen Sarsby Charter House, Parkway, Welwyn Garden City AL8 6JL Tel: 01707 685 349
NSPCC & Helpline
0808 800 5000 0800 028 0285 NSPCC Helpline help@nspcc.org.uk
Ofsted
Ofsted General helpline: 0300 123 1231 **Ofsted website (Contact Us)** **Compliance, investigation and enforcement:** **Ofsted website**: https://www.gov.uk/government/organisations/ofsted
Police
Main Switchboard (Police Enquiry Centre) tel: **0845 3300 222** Joint Child Protection Investigation Team (JCPIT) normal hours are 08.00-22.00 Monday to Friday & 09.00-17.00 weekends and bank holidays tel: 01707 354 000 Outside of these hours Emergency calls: **999** Non-emergency calls: **101** Domestic Violence/Abuse Information and advice line: 08 088 088
Probation
Probation office HQ tel: 01438 747074

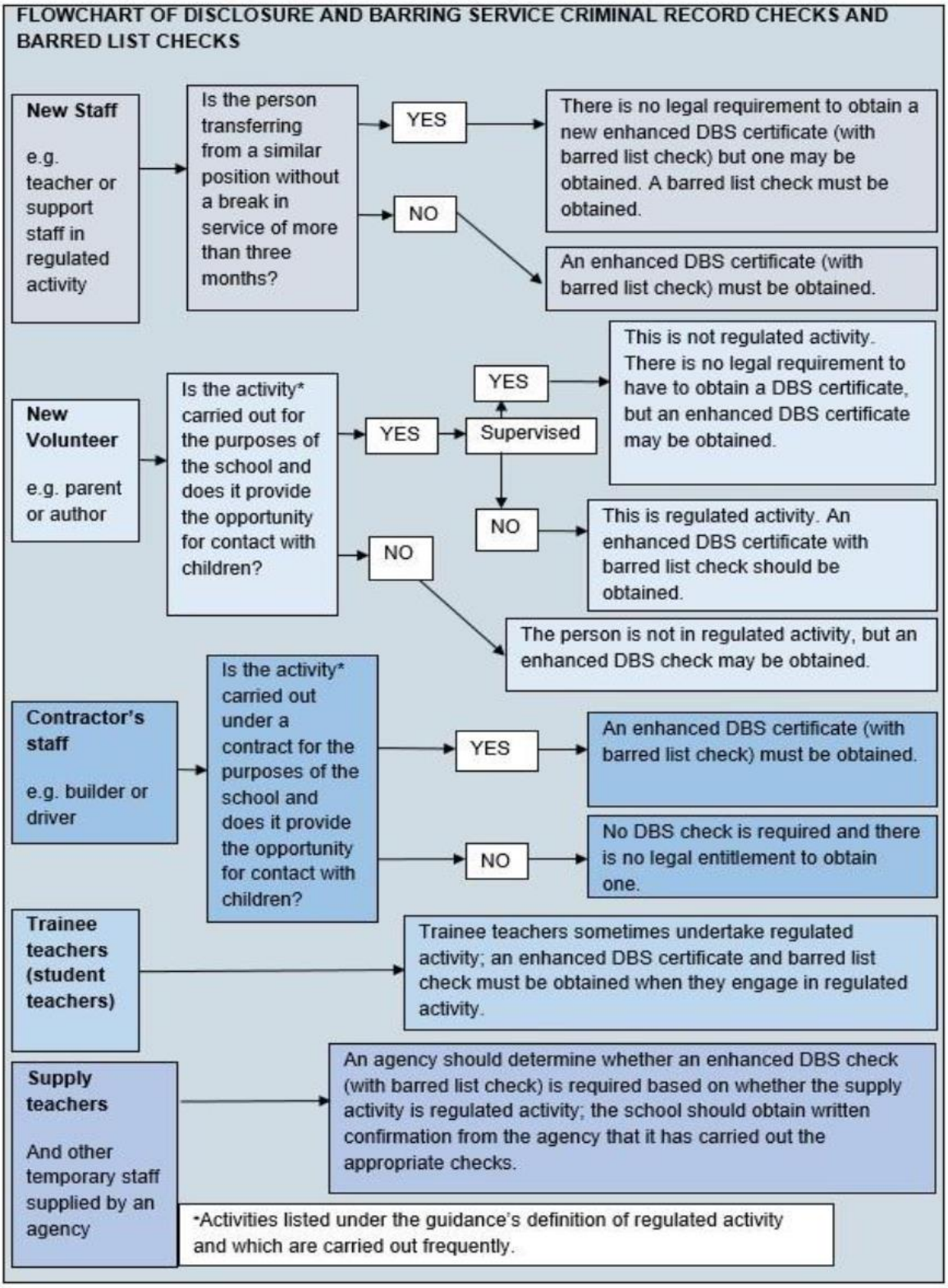
MAPPA Manager Tel: 01707 354858 **SEEdivisionaloffice.generalenquiries@probation.gov.uk**
Substance Misuse Teams /Community Drugs Team
Adolescent - Drug and Alcohol Service for Hertfordshire (A-DASH) Tel: 01992 531917 email: **A-Dash@hpft.nhs.uk** Adolescent Drug and Alcohol Service for Hertfordshire (A-DASH) - Hertfordshire Partnership (NHS) website
Youth Connexions (Careers Advice)
Tel: 0300 123 7538 **Hertfordshire Connexions website**
Victim Identification Unit
Child Online Safeguarding Team (COST) Hertfordshire Constabulary HQ, Stanborough Road, Welwyn Garden City, Hertfordshire. VictimID@herts.pnn.police.uk
Other
CPSLO (Child Protection Schools Liaison Officer) North Herts, Hatfield, St Albans and Hertsmere Paula Hayden Work 01992 556710 paula.hayden@ hertfordshire.gov.uk LADO – Local Area Designated Officer Please see guidance on this webpage Local Authority Designated Officer (LADO) professionals referral - Hertfordshire Grid for Learning

Hertfordshire Key Phone Numbers

Children's Commissioner	020 7783 8330
Childline	0800 11 11
Local police (emergency)	999
Local police (non-emergency)	101
Independent Schools Inspectorate	0207 600 0100
Hertfordshire Children's Safeguarding Board	0300 123 4043
Preventing Extremism in Schools - Home Office Hotline	0207 340 7264

Safeguarding Flow Charts

Actions where there are concerns about a child


FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS
New Staff
e.g. teacher or support staff in regulated activity
Is the person transferring from a similar position without a break in service of more than three months?
YES
There is no legal requirement to obtain a new enhanced DBS certificate (with barred list check) but one may be obtained. A barred list check must be obtained.
NO
An enhanced DBS certificate (with barred list check) must be obtained.
New Volunteer
e.g. parent or author
Is the activity* carried out for the purposes of the school and does it provide the opportunity for contact with children?
YES
Supervised
YES
This is not regulated activity. There is no legal requirement to have to obtain a DBS certificate, but an enhanced DBS certificate may be obtained.
NO
This is regulated activity. An enhanced DBS certificate with barred list check should be obtained.
NO
The person is not in regulated activity, but an enhanced DBS check may be obtained.
Contractor's staff
e.g. builder or driver
Is the activity* carried out under a contract for the purposes of the school and does it provide the opportunity for contact with children?
YES
An enhanced DBS certificate (with barred list check) must be obtained.
NO
No DBS check is required and there is no legal entitlement to obtain one.
Trainee teachers (student teachers)
Trainee teachers sometimes undertake regulated activity; an enhanced DBS certificate and barred list check must be obtained when they engage in regulated activity.
Supply teachers
And other temporary staff supplied by an agency
An agency should determine whether an enhanced DBS check (with barred list check) is required based on whether the supply activity is regulated activity; the school should obtain written confirmation from the agency that it has carried out the appropriate checks.
*Activities listed under the guidance's definition of regulated activity and which are carried out frequently.