



RENDCOMB COLLEGE

NURSERY • JUNIOR • SENIOR

Safeguarding Children (Child Protection) Policy and Procedures

(ISI: 7a)

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DSL and DDSLs

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Policy statement and principles.

Rendcomb College fully recognises its responsibilities for safeguarding children (child protection). This policy is made available via the Rendcomb College website, the parental handbook and on request. This policy is reviewed on an annual basis by Governors within the Education & Personnel Committee.

Our policy applies to the whole college including EYFS and to all staff (teaching and business support), Headmaster, Governors and volunteers in the college. The procedures are consistent with those of the Local Safeguarding Children Board.

This policy was drawn up in accordance with the Department for Education guidance 'Keeping Children Safe in Education' September 2019 and 'Working together to Safeguard Children' March 2018, the Education (Independent Schools Standards) (England) Regulations 2014 and the Prevent duty guidance 2015.

Our core safeguarding principles are:

- safeguarding is everyone's responsibility
- the college's responsibility to safeguard and promote the welfare of children is of paramount importance
- safer children make more successful learners
- policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.

Policy aims

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities
- To ensure consistent good practice
- To demonstrate the college's commitment regarding child protection to pupils, parents and other partners

Terminology

Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

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

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

DSL refers to the designated safeguarding lead at the college

Child includes everyone under the age of 18.

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

Safeguarding legislation and guidance

The following safeguarding legislation and guidance has been considered when drafting this policy:

- Section 157 of the Education Act 2002 (Independent Schools only, including academies and Free Schools)
- The Education (Independent Schools Standards) Regulations 2014 (Independent Schools only, including academies and Free Schools)
- The Safeguarding Vulnerable Groups Act 2006
- The Teacher Standards 2012
- Working Together to Safeguarding Children 2018
- Working Together: Transitional Guidance 2018
- Keeping Children Safe in Education 2019
- What to do if you're worried a child is being abused 2015
- Prevent duty guidance 2015.

Roles and responsibilities

Key personnel

The designated safeguarding lead (DSL) for child protection is Michelle Lucas-Halliwell

Contact details: email: safeguarding@rendcombcollege.org.uk

Tel 01285 8323969/07557238870

The DSL is also the Mental Health Lead, the designated person in charge of looked after children and is responsible for early help.

The deputy designated leads are:

Jonnie Howorth: email dhp@rendcombcollege.org.uk. Fiona

Auster: email austerf@rendcombcollege.org.uk Catherine

Breare: brearec@rendcombcollege.org.uk

The head teacher is Rob Jones

Contact details: headofcollege@rendcombcollege.org.uk

The nominated child protection governor are: Prue Hornby

The Designated Safeguarding Lead (DSL):

The designated safeguarding lead (DSL) takes **lead responsibility** for safeguarding and child protection (including online safety) in the college. The DSL has the status and authority within the college to carry out the duties of the post, which include:

- ensuring the child protection policies are known, understood and used appropriately by staff, reviewed annually and publically available
- advising and supporting staff on child protection and safeguarding matters
- encouraging a culture of listening to children
- managing safeguarding referrals to children's social care, the police, or other agencies
- taking part in strategy discussions and inter-agency meetings
- liaising with the "case manager" and the designated officer(s) at the local authority where allegations are made against staff
- making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements
- transferring the child protection file to a child's new school.
- undergoing training and receiving regular updates to maintain the knowledge and skills required to carry out the role, including Prevent awareness training.
- understanding the unique risks associated with online safety and to be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.

The deputy designated safeguarding lead(s):

Is/are trained to the same level as the DSL and supports the DSL with safeguarding matters as appropriate. In the absence of the DSL, the deputy DSL carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL, the deputy will assume the functions above.

Child protection procedures

Abuse

Recognising abuse

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

Abuse may be committed by adult men or women and by other children and young people (Teenage Relationship Abuse).

Four categories of abuse

Physical abuse

Physical abuse is 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. (This used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent 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 cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse

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

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.

Indicators of abuse

Physical signs can indicate some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their

abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioral indicators of abuse and report any concerns to the designated senior person.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school, arrive late or leave the school for part of the day
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new 'friends'

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

It is very important that staff report their concerns – they do not need 'absolute proof' that the child is at risk.

Impact of abuse

The impact of child abuse, neglect and exploitation should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

Taking action

Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”. Key points for staff to remember for acting are:

- In an emergency take the action necessary to help the child (including calling 999)
- Report your concern as soon as possible to the DSL, definitely by the end of the day
- Do not start your own investigation
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- Complete a record of concern using My Concern.
- Seek support for yourself if you are distressed.

Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child’s wellbeing and in very rare cases has been a feature in the suicide of some young people.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our anti-bullying policy. All pupils and parents receive a copy of these procedures in the pupil handbook on joining the college and the subject of bullying is addressed at regular intervals in PSHEE education. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the DSL will consider implementing child protection procedures.

Cyber bullying

Cyberbullying may be defined as ‘the use of electronic communication, particularly mobile phones and the internet, to bully a person, typically by sending messages of an intimidating or threatening nature’. It can take a number of different forms: threats and intimidation, harassment or ‘cyber-stalking’ (e.g. repeatedly sending unwanted texts or instant messages),

sexting (e.g. sending and receiving sexually explicit messages, primarily between mobile phones) vilification/defamation, exclusion/peer rejection, impersonation, unauthorised publication of private information/images and 'trolling' (abusing the internet to provoke or offend others online). It can be an extension of face-to-face bullying, with technology providing the bully with another route to harass their target.

Peer on peer abuse/sexual violence.

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the college's anti-bullying procedures where necessary. However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures.

Peer on peer abuse can take many forms, including:

- physical abuse such as biting, hitting, kicking or hair pulling
- sexually harmful behaviour/sexual abuse such as inappropriate sexual language, touching, sexual assault
- sexting, including pressuring another person to send a sexual imagery or video content
- teenage relationship abuse - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner
- initiation/hazing - used to induct newcomers into an organisation such as sports team or college groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them
- prejudiced behaviour - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.
- Upskirting – the act of taking a photograph of underneath a person's skirt without their consent, has also been made illegal and must be reported to the Police.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Different gender issues can be prevalent when dealing with peer on peer abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. At our college, we take the following steps to minimise or prevent the risk of peer on peer abuse.

- An open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them.
- Assemblies are used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying

- RE and PSHE are used to reinforce the message through stories, role play, current affairs and other suitable activities.
- Staff will endeavour always to create surroundings where everyone feels confident and at ease in college.
- We will ensure that the college is well supervised, especially in areas where children might be vulnerable.

All allegations of peer on peer abuse should be passed to the DSL immediately. They will then be investigated and dealt with as follows.

- Information gathering – children, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was intent to cause harm.
- Decide on action – if it is believed that any young person is at risk of significant harm, a referral will be made to children’s social care. The DSL will then work with children’s social care to decide on next steps, which may include contacting the police.
- Inform parents - as with other concerns of abuse, the college will normally seek to discuss concerns about a pupil with parents. Our focus is the safety and wellbeing of the pupil and so if the college believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s social care and/or the police before parents are contacted.

Supporting those involved

The support required for the pupil who has been harmed will depend on their circumstance and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support may also be required for the pupil that harmed. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil and/or change behaviours. Once those needs have been met, the consequences for the harm caused or intended will be addressed.

Serious Violent Crime

All staff are made aware of indicators that children are at risk from or are involved with serious violent crime. These include increased absence, 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 could also indicate that children have been approached by or are involved with individuals associated with criminal gangs.

Online Safety, Digital Technology and Mobile Phones

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate material. The use of technology has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation and sexual predation.

We have ensured that appropriate filters and monitoring systems are in place to manage the content available to pupils, who can contact our pupils and the personal conduct of our pupils online. While it is acknowledged that filtering within our network is important, it does not help with regards to 3G and 4G, which give unrestricted access to the internet. Currently we are fortunate that given our remoteness, it is still quite difficult to access 3G/4G and even if you are able to, it is extremely slow, which effects the ability to stream videos and other digital content. However, we realise that it is important that we monitor this as technology changes rapidly. To help in this endeavor, we use <https://360safe.org.uk/>. At Present Pupils in College may carry mobile phones with them during the school day but these should only be used with the express permission of a member of staff. Boarders in Godman will be required to hand in their phones over night to ensure pupils cannot use 3G or 4G networks. Pupils in Lawn House, Stable House and Park house are allowed to keep phones with them, however this is at the discretion of the House parents and they will be removed if house staff feel they are being used inappropriately.

The schools also uses PSHEE sessions as well as the expertise of external experts to ensure that our students understand how to keep themselves safe online and what they should do if they are concerned for their safety. This includes reporting to external agencies such as CEOP. We also regularly liaise with parents to keep them up to date with online safety. This is done through the newsletter as well as dedicated parental information sessions. The last one was held in March 2019 and covered relevant resources to help tackle key online risks and behaviors displayed by pupils at different ages in the school/college

Links to the Acceptable use policy

The College's policy on the use of mobile phones and cameras in the College, including the EYFS setting, is as follows:

There are separate acceptable use policies for pupils and staff. In the EYFS setting, neither staff nor pupils are permitted to bring mobile phones or any mobile device with a camera facility into the area. Staff and volunteers should use mobile phones and cameras in accordance with the guidance set out in the staff Code of Conduct.

Parents may bring mobile phones onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publications of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

Sexting

There is no accepted definition of 'sexting' but most professionals agree that it refers to the sending or posting of sexually suggestive images, including nude or semi-nude photographs of a person under 18 years of age, via mobiles or over the internet. The UKCCIS advice document refers to this as 'youth produced sexual imagery'.

All incidents involving youth produced sexual imagery will be responded to as follows:

- The incident will be referred to the DSL immediately and the DSL will hold an initial review meeting with appropriate staff. If appropriate, this may include seizure of devices and interviews with the young people involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately in accordance with this policy.
- At no point should an adult, including the DSL look for images. For images to be removed from the device, the DSL will advise the child to remove the images from their device and the DSL will then check to see the images have been deleted.

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

Child Sexual Exploitation

CSE involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

The college includes the risks of sexual exploitation in the PSHEE curriculum. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what

they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSL.

Honour-Based Violence

‘Honour-based’ violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse.

Forced Marriage

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales, the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014.

Children may be married at a very young age, and well below the age of consent in England. College staff receive training and should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not be allowed to return to England.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014

Female Genital Mutilation

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so college staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupil about going on a long holiday during the summer vacation period.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both. Section 5B of the 2003 Act¹ means that there is a mandatory reporting duty which requires all teachers in England and Wales to report 'known' cases of FGM in under 18s.

Reporting cases of FGM

Whilst all staff should speak to the DSL immediately with any concerns about FGM, there is a specific legal duty on teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers to 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.

Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

A teacher must personally report to the Police cases where they discover that an act of FGM appears to have been carried out. They should also discuss any such case with the Designated Safeguarding Lead. The member of staff should call Gloucestershire Police on 101 or if there is an immediate risk to life or serious harm 999.

Criminal Exploitation of Children

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs exploiting children to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

County lines exploitation can affect any child under the age of 18 years. It can still be exploitation even if the activity appears consensual, can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. County lines exploitation can be perpetrated by individuals or groups, males or females, and young people or adults and is typified by some form of power imbalance such as age, gender, cognitive ability, physical strength, status, and access to economic or other resources.

Staff need to be aware of the signals to show that children are at risk from, or are involved in serious violent crime, including from organised crime groups involved in county lines. Indicators include:

- Increased absences from school.
- A change in friendships or relationships with older individuals or groups.

- A significant decline in performance
- Signs of self harm or a decline in emotional wellbeing
- Signs of assault/unexplained injuries.
- Unexplained gifts/new possessions

Procedures for reporting concerns

- Concerns should initially be reported to the DSL/DDSL
- They will assess if the child is in imminent danger. If so, they will contact the local Police Protection Officer/Safer Schools Officer who will either apply for an emergency protection order or they will make a referral through the National Referral Mechanism.
- If the assessment is that the Child is not in immediate danger, the college will follow local safeguarding procedures.
- Unless there are child protection reasons not to, parents/guardians will be contacted.

Domestic Violence

This is any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners or family members, regardless of gender or sexuality. **Any concerns should be reported to the DSL who will make a referral to GDASS.**

Radicalisation and Extremism

The government defines extremism as 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.

Some children are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Islamic extremism is the most widely publicised form and schools should also remain alert to the risk of radicalisation into white supremacy extremism. College staff receive training to help to identify signs of extremism. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the college promotes fundamental British Values as part of PSHEE.

Any child, in any family in any college could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”.

Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or a close relative

cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

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

Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

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

Procedures for Safeguarding Children

It is college policy to comply fully with the child protection procedures established by Gloucester County Council for use in educational establishments.

The college has an important role in its frequent contact with the children. The staff get to know the children quite well: they form trusting relationships; they see changes in behaviour, and they are available for the sharing of concerns.

It is the policy of Rendcomb College to safeguard the welfare of the children by protecting them from physical, sexual and emotional abuse, neglect and bullying. As such staff are informed of the definitions of these and other forms of Child Abuse through the Definitions of Child Abuse in the staff handbook and in Part 1 of 'Keeping Children Safe in Education'.

A bullying incident will be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Where an allegation is made against a pupil of the college, the college's Behaviour Policy shall apply. The college will take advice from child protection agencies as to appropriate action to ensure the safety and welfare of all members of the college community involved including the alleged abuser. Parents will be informed as soon as possible, unless it is not in the best interests of the child to do so.

It is the responsibility of each member of staff (that is anyone working in the college, paid, unpaid, contracted for services or not including supply staff and volunteer) to ensure that their behaviour is appropriate at all times. If there is an allegation or suspicion of abuse, this must be referred immediately to the college Designated Safeguarding Lead. In the college,

the Designated Safeguarding Lead (DSL) is Michelle Lucas-Halliwel who is a member of the Senior Management Team. The college deputies are Fiona Auster who is the J4 Teacher and Catherine Breare who is a J4 teacher. For the Early Years Foundation Stage the responsibility is devolved to the Junior College Deputy DSLs, although the college DSL will have the overall responsibility.

The college is not an investigation or intervention agency. At all times the child's welfare must be paramount. Swift reporting will enable the correct authorities to give advice and take appropriate action. There is an obligation for the college to act in this way.

Any information conveyed by a member of staff to the college DSL must not be withheld or filtered but must be passed on immediately to the correct agency. These procedures are not negotiable; they enable the Governors to fulfil their legal as well as moral responsibilities. The member of staff should never give absolute guarantee of confidentiality but assure the pupil or adult that they will only pass on information to the minimum number of people who need to be told. They should also emphasise that they will take whatever steps are necessary to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made.

Procedures at Rendcomb College

1. Any suspicion that a pupil at the college is suffering from abuse or is in danger of radicalisation should, in the first instance be referred to the member of staff designated to deal with child abuse (appointed Designated Safeguarding Lead or, if unavailable, their Deputy).

Michelle Lucas-Halliwel (Senior College); tel: 01285 832369 or 07557238870; or you can email safeguarding@rendcombcollege.org.uk (Senior Management Team – Head of Welfare)

If they are unavailable, it is advisable to contact the Deputy Designated Safeguarding Leads: Jonnie Howorth (DHP) tel: 01285 832369 or you can email DHP@rendcombcollege.org.uk. If the matter involves children in the Junior please contact Fiona Auster, tel: 01285 832310 or email AusterF@rendcombcollege.org.uk or Catherine Breare, tel: 01285 832310 or email BreareC@rendcombcollege.org.uk

Child abuse includes abuse at home which a pupils reports to staff, abuse by a stranger outside of college and abuse of one pupil by another pupil. In the case of abuse by a pupil, or group of pupils, the key issues identifying the problem as abuse (rather than an isolated case of bullying or “adolescent experimentation” which might be considered within normal bounds in the college community) are:

- The frequency, nature and severity of the incident(s);
- Whether the victim was coerced by physical force, fear, or by a pupil or group of pupils

significantly older than him or herself or having power or authority over him/her;

- Whether the incident involved a potentially criminal act and whether if the same incident (or injury) had occurred to a member of staff or other adult, it would have been regarded as assault.

2. If there is any injury to the child which requires treatment, the member of staff responsible for the child should contact Sister in the Medical Centre: tel: 01285 832329; mobile: 07786 653983

3. The concern of the reporting member of staff should be accurately and legibly recorded in writing, signed and dated and given to the college DSL as soon as possible.

4. The college DSL will arrange to interview the child to further substantiate the concern and if it meets threshold will refer to the relevant external agencies. The DSL will then await guidance as to next steps.

5. At all times, the college DSL will follow the guidelines given in The Gloucestershire Safeguarding Children Board's Handbook, which can be accessed at www.gscb.org.uk/handbook

6. In order to decide whether the concern meets the necessary threshold for referral, the DSL will consult the Gloucestershire's levels of intervention guidance, specifically the 'continuum of need'. <http://www.gscb.org.uk/media/1517569/gloucestershire-revised-loi-guidance-version-30-final-300118.pdf>

7. If the DSL is still unsure if the concern meets the necessary threshold for referral, the DSL will have a discussion with the Practitioner Advice line 01452 426565 (option 3) or the Community Social Worker for the Cotswolds 01452 328101.

8. In cases where the Designated Safeguarding Lead decides that either an Early help referral or a social work assessment is required, in the case of a 'child in need', a referral will be made in the first instance using the Multi Agency Service Request Form. If the concern is that the child is 'at risk' an urgent referral will be made via the GSCB 'Front Door' 01452 426565 option 1 (urgent). The 'Children and Young People's Directorate' (CYPD) will then take responsibility. Physical and sexual abuse concerns will be made immediately; any other concerns will be referred within 24 hours. Verbal concerns will subsequently be written up and will be submitted to the CYPD within 48 hours.

9. If there is a concern for immediate safety out of hours, the emergency duty team will be contacted on 01452 614194. If the child is felt to be in any danger, he or she should not be allowed to go home, if this is at all possible.

10. The discussion with 'Children and Young People's Directorate' should involve

consideration of how, when and by whom the parents should be informed of the concern, bearing in mind on the one hand, the need to protect the child and on the other, the duty of the “Children and Young People’s Directorate” and the College to work in partnership with parents, wherever possible.

11. Referrals of allegations or suspicions of abuse by a member of staff will be made by the DSL or their deputies, to the Local Authority Lead Designated Officer, 01452 426994. Any person whose services are subsequently discontinued because he or she is considered to be unsuitable to work with Children will be reported to the Disclosure and Barring Services. This referral will be made within one month.

12. If the DSL/DDSL has a concern about a pupil being radicalised they will contact either 101, or the Department for Education’s dedicated helpline (020 7340 7264) or email counter.extremism@education.gsi.gov.uk. In emergency situations, such as a child being at immediate risk of harm or in the event of a security incident, normal emergency procedures will be followed.

Anybody can make a referral and staff are advised and encouraged to make a referral themselves if they feel there has been inaction by the school.

Safeguarding Students with Special Educational Needs

We recognise that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges and this policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration;
- Children with SEN and disabilities can be disproportionately impacted by issues such as bullying (particularly cyberbullying) sometimes without showing any obvious signs; and
- There are sometimes communication barriers due to physical or social issues, which means that students do not or are not able to make a disclosure.

To ensure that we effectively safeguard our students with special educational needs, the DSL liaises regularly with the college SENCO. This includes a weekly meeting where students are discussed and joint strategies put in place.

When applying disciplinary measures such as restraint or isolation in response to incidents involving children with SEN and disabilities, it is important to consider the risks carefully, given the additional vulnerability of the group. To safeguard a pupil others, it may be necessary to use restraint and yet restraint is likely to impact on the well-being of the child. Consequently

it is important to plan positive and proactive behaviour support, which will reduce the occurrence of risky behaviour and the need to use restraint. Guidance is available here: use of reasonable force in schools.

Looked After Children

The most common reason for children becoming looked after is as a result of abuse or neglect. The college ensures that staff have the necessary skills and understanding to keep looked after children safe. The designated teacher for looked after children is the DSL who will have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child as well as details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

Children Missing in Education

Children Missing Education (CME) refers to 'any child of compulsory school age who is **not** registered at any formally approved education activity e.g. school, alternative provision, elective home education, **and** has been out of education provision for at least 4 weeks'.

CME also includes those children who are **missing** (family whereabouts unknown), and are usually children who are registered on a school roll/alternative provision. This might be a child who is not at their last known address **and either**

- has not taken up an allocated school place as expected, or
- has 10 or more days of continuous absence from the college without explanation, or
- left the college suddenly and the destination is unknown

For this reason it is vital that prolonged absences are referred to the DSL who will consider a referral to: Access to Education Team, Shire Hall, Westgate Street, Gloucester GL1 2TP. Tel 01452 328774 / 426015 or email missingpupils@gloucestershire.gov.uk

Children Staying with Host Families

The college may arrange for pupils to stay with a host family during a foreign exchange trip or sports tour while some overseas pupils may reside with host families during college terms.

It is not possible for schools to obtain criminal record information from the DBS about adults abroad. Where pupils stay with families abroad, we will agree with partner schools a shared understanding of the arrangements in place. Staff will use their professional judgement to satisfy themselves that the arrangements are appropriate to safeguard the pupils, which will include ensuring pupils understand who to contact should an emergency occur, or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.

The college follows the guidance in Annex E of *Keeping Children Safe in Education (2019)* to ensure that hosting arrangements are as safe as possible.

Confidentiality

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL, Headteacher/principal or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis. Child protection information will be stored and handled in line with the General Data Protection Regulation (GDPR). Information sharing is guided by the following principles;

The information is:

- necessary and proportionate
- relevant
- adequate
- accurate
- timely
- secure.

Information sharing decisions will be recorded, whether or not the decision is taken to share.

Record of concern forms and other written information will be stored in a locked facility or kept electronically secure on our specialist encrypted database. Any electronic information will be password protected or encrypted and only made available to relevant individuals.

Child protection information will be stored separately from the pupil's college file and the college file will be 'tagged' to indicate that separate information is held.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information within the college or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the DSL.

The GDPR does not prevent college staff from sharing information with relevant agencies, where that information may help to protect a child.

Safer Recruitment

Our college complies with the requirements of Keeping Children Safe in Education (2019) and the local safeguarding partner arrangements by carrying out the required checks and verifying the applicant's identity, qualifications and work history. The college's Staff Recruitment policy and procedures set out the process in full. At least one member of each recruitment panel will have attended safer recruitment training.

Volunteers

Volunteers, including governors will undergo checks commensurate with their work in the college, their contact with pupils and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised.

Site Security

Visitors to the college are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the college's safeguarding and health and safety regulations. The head teacher will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

Extended School and Off-Site Arrangements

All extended and off site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the college, our own child protection policy and procedures apply. If other organisations provide services or activities on our site on behalf of the college, we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our pupils attend off-site activities, including day and residential visits and work related activities, we will check that effective child protection arrangements are in place.

Disguised Compliance

Disguised compliance occurs when a parent or carer gives the appearance of co-operating with child welfare agencies to avoid raising suspicions, to allay professional concerns and ultimately to diffuse professional intervention. Published case reviews highlight that professionals sometimes delay or avoid interventions due to parental disguised compliance. The learning from these reviews highlights that professionals need to establish the facts and gather evidence about what is actually happening, rather than accepting parent's presenting

behaviour and assertions. By focussing on outcomes rather than processes professionals can keep the focus of their work on the child.

Risk factors in disguised compliance

- **Missing opportunities to make interventions** - A reduction or downgrading in concern on the part of professionals can allow cases to drift, so losing the opportunity to make timely interventions.
- **Removes the focus from the child** - Disguised compliance can lead to a focus on adults rather than on achieving safer outcomes for the child.
- **Over optimism about progress** - Professionals can become over optimistic about progress being achieved, again delaying timely interventions.

Recognising disguised compliance

- **Parents deflecting attention** - Parents focus on engaging well with one set of professionals, for example in education, to deflect attention from their lack of engagement with other services.
- **Criticising professionals** - Parents criticise or are confrontational to professionals within the college and other organisations to divert attention away from their own behaviour.
- **Failure to engage with services as recommended** - Parents promise to take up services offered but then fail to attend.
- **Avoiding contact** - Parents promise to change their behaviour and then avoid contact with professionals.

Improved practice to avoid disguised compliance

Recording can become focussed on the adult's participation and parenting capacity. Instead the focus should be on recording the children's perspective and situation and for this reason,

- The child should be spoken to in order to establish facts, ideally before parents or carers.
- Focus should be on outcomes rather than process, so that attention cannot be deflected by good intent or an appearance of participation.
- Identify and establish clear, understandable and measurable outcomes and take action when outcomes are not achieved within agreed time scales.
- In addition, it is sometimes easy to become overly optimistic about change that has occurred or will occur as a result of promises but not action. It is therefore important to see evidence of actual progress and to make timely referrals when this is not forthcoming.

Staff Guidance

To assist all staff (teaching and business support) the college will provide:

- Regular INSET training (at least every three years – online and face to face.)
- Documentation from the INSET training
- Regular updates from the LSCB

Links to Other Policies

All Staff **must** sign a form (which is held on file) to show they read and understood the following documents which are linked with the Safeguarding Children Policy and are available in the Staff Handbook:

- Code of Conduct for staff
- Part 1 of Keeping Children Safe in Education and Annex A.
- Acceptable Use Policy

In addition to this Teaching staff **must** also have read the following:

- Anti-Bullying Policy and Procedures (including cyberbullying and sexting)
- Safer Recruitment Policy
- Physical Restraint Policy
- Mental Health Policy
- Whistleblowing Policy
- Drugs Policy

Allegations against Staff (including Volunteers and the Headmaster)

All staff are expected to have read and abide by the Comprehensive Code of Safe Practise. This is designed to ensure that staff understand what is expected of their behaviour. Where there are concerns or on occasions where an allegation has been made the college's procedure for managing allegations against staff follows the Department for Education guidance 'Dealing with Allegations of Abuse against Teachers and other Staff' and LSCB local arrangements.

The college's whistleblowing policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

The procedure below is followed when staff or volunteers have (or alleged to have):

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or

- behaved towards a child or children in a way that indicated that he or she would pose a risk of harm if he or she work regularly or closely with children.

All staff, governors and volunteers (including those senior pupils in a position of responsibility) have a responsibility to familiarise themselves with this policy so that they can understand what to do if they receive an allegation against a member of staff or have concerns about the behaviour of a member of staff.

The college will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. The college will liaise with the LADO, police and social care services as to managing confidentiality as appropriate.

Procedure for managing allegations against staff

1. An allegation made against teachers and other staff (including volunteers who work with children) must be reported immediately to the **Headmaster**. Should the initial allegation first be made to any other member of staff then that member of staff must either request the person raising the allegation to report it to the Headmaster or if that is not possible to pass details of the allegation to the Headmaster immediately.

Where the allegation is made against the Headmaster, the person must immediately inform the Chair of Governors, or in their absence, the Governor responsible for Child Protection, without first notifying the Headmaster. If the allegations involve the DSL or the Chair of Governors, the person must immediately inform the Deputy DSL or Headmaster without first informing the DSL or the Chair of Governors.

2. The Headmaster, DSL and Deputy DSL(s) should not make their own decision over what appears to be borderline cases. If there is room for doubt as to whether a referral should be made, the DSL or the Deputy DSL(s) will consult with the LADO for advice on deciding whether to make a formal referral, on a no names basis.
3. The LADO will be informed of all allegations which appear to meet the above criteria.
4. The Headmaster, DSL or Deputy DSL will discuss the matter with the LADO and where necessary, the LADO will obtain further details of the allegation and the circumstances in which the allegation was made. The college will act in accordance with any advice given by the LADO and will not investigate allegations or inform any individuals without the LADO's consent.
5. The college may take action in the event of allegations against staff in accordance with its disciplinary procedures.
6. Professional misconduct matters will be referred to the relevant regulatory body,
7. If the member of staff (including a volunteer or Governor) is deemed unsuitable to

work with children and the college ceases to use their services, the college will make a detailed and prompt report to the Disclosure and Barring Service, PO Box 3963, Royal Wootton Bassett, SN4 4HH, Tel: 03000 200 190 as well as to the Teacher Regulation Agency, Ground Floor, South, Cheylesmore House, 5 Quinton Road, Coventry, CV1 2WT. Tel: 0207 593 5393 Email: misconduct.teacher@education.gov.uk.

8. *Early Years Foundation Stage* – the Headmaster or the Junior college DSL will inform Ofsted as soon as reasonably practicable and at the very latest within 14 days of the allegation being made of any allegation of serious harm or abuse by any person living working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere).

Suspension

Suspension will not be an automatic response to an allegation but will be considered where the circumstances warrant it, including:

- there is cause to suspect a child or other children at the college is or are at risk of significant harm
- the allegation warrants investigation by the police
- the allegation is so serious that it might be grounds for dismissal
- it is necessary to progress the investigation.

If suspension is deemed appropriate, the reasons and justifications will be recorded by the college and the individual will be notified of the reasons usually within one working day. Arrangements will be made for alternative accommodation (away from children) where a member of the boarding staff is suspended pending investigation.

Duty of care

The college recognises that it has a duty of care towards its employees and will ensure support is in place for individuals facing an allegation. Individuals should be informed of concerns or allegations and given an explanation of the likely course of action as soon as possible, unless external agencies object to this. We will be guided by LADO on this. A representative will be appointed by the college to keep the individual informed of progress of the case (**ideally this should not be a member of the investigation team or the Headmaster**) and to consider what other support is available and appropriate for the individual.

Record keeping

The college will keep a clear and comprehensive record of any allegation made, the action taken and decisions reached. However, any malicious allegations will be removed from personnel records entirely. The college will provide the accused person with a copy of the record following consultation with the appropriate agencies and agreement has been reached

as to what information can be disclosed. The record will be kept confidentially on the personnel file.

Malicious allegations

The Headmaster will consider whether to take disciplinary action where an allegation by a pupil is shown to be malicious or deliberately invented.

Those allegations which are determined to be unfounded, unsubstantiated or malicious will not be included in references.

Timescales

It is in everyone's interest for cases to be resolved as quickly as possible consistent with a fair and thorough investigation.

Useful Contacts

The MASH	
If you are worried or concerned about anyone under 18 who you think is being abused or neglected, or that a child and their family need help and support, please contact The Front Door Opening hours: 9am - 5pm	01452 42 6565 Option 1 01452 42 6565 Option 3 - Children's Practitioner Advice Line or childrenshelpdesk@gloucestershire.gov.uk

Out of office hours	
Outside of office hours, you should contact the Emergency Duty Team (EDT) or, if you have concerns about the immediate safety of the child or you believe a serious criminal offence has been committed please contact the Police at any time on 101 .	01452 61 4194 or 101

To report a concern about a professional working with children (Allegations Management)

Nigel Hatten, LADO (Local Authority Designated Officer) nigel.hatten@gloucestershire.gov.uk	01452 42 6994
Tracy Brooks, Allegations Management Co-Ordinator tracy.brooks@gloucestershire.gov.uk	01452 42 6320