



City Gateway College Safeguarding and Child Protection Policy

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1. Introduction and Scope of Policy

City Gateway College (CGC) is committed in its duty of “safeguarding and promoting the welfare of children” (Education Act 2002, sec. 175), recognising that this is fundamental to every activity and interaction that occurs within the life of the college. The colleges safeguarding policies and practices ensure we are supporting our students and the wider college community by protecting them from harm, promoting their welfare and overcoming barriers to achievement. We provide an environment in which students, carers, staff and visitors feel safe, valued, listened to and supported.

1.1 Safeguarding Definition

This policy utilises the definition of safeguarding published in the government guidance ‘[Working Together to Safeguard Children](#)’ (2015) and ‘[Keeping Children Safe in Education](#)’ (2016), which defines safeguarding as:

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

Safeguarding practices apply to every member of the college community, but in recognition of the age range of our students, we identify our professional duty towards two relevant groups within the college:

- **children**
 - anyone under the age of 18.
- **adults at risk**
 - aged 18 years or over
 - has needs for care and support (whether or not the authority is meeting any of those needs),
 - is experiencing, or is at risk of, abuse or neglect, and
 - as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it

Put simply, **safeguarding involves protecting students from harm, and taking the necessary actions to promote their welfare.**

1.2 Equality and Diversity

Intrinsically related to our safeguarding duty, CGC and its staff are subject to the Equality Duty (Equality Act, 2010). The Equality Duty requires public bodies to have due regard to the need to:

- I. Eliminate discrimination and other conduct that is prohibited by the Act
- II. Advance equality of opportunity between people who share a protected characteristic and people who do not share it
- III. Foster good relations across all characteristics – between people who share a protected characteristic and people who do not share it.

The protected characteristics outlined within the act are:

- **Race** (*race, colour, ethnic/national origin, nationality – including citizenship*)
- **Sex** (male or female)
- **Age**
- **Disability** (*physical or mental condition and long-term/progressive illness i.e. HIV*)
- **Sexual Orientation** (*lesbian, gay, bi-sexual and heterosexual*)
- **Religion or belief** (*religion, religious or non-religious belief*)
- **Gender Reassignment** (*includes those who chose to live in the opposite gender assigned to them at birth, those in the process of gender reassignment and those who have undergone gender reassignment*)
- **Marriage or Civil Partnership** (*married or in a civil partnership*)
- **Pregnancy and Maternity** (*pregnant, on maternity leave or breastfeeding*)

Safeguarding practices and the wider conduct of staff must comply with the Equality duty.

2. Responsibilities and Expectations of Staff and Volunteers

The guidance *‘Keeping Children Safe in Education’* (2016) makes clear that **everyone has responsibility for safeguarding students** at CGC. This requires all staff and volunteers to adopt a child-centred approach that considers, at all times, what is in the best interest of the student. Fulfilling the safeguarding responsibility involves all staff and volunteers:

- creating a safe environment for learning
- conducting themselves in a professional manner and maintaining appropriate boundaries (see section 5)
- ensuring students feel heard
- identifying concerns (including Early Help identification – see section 4.1)
- handling disclosures (see section 3.1)
- sharing information and reporting concerns (see section 3.2)
- taking prompt action, and
- developing resilience and the capacity to manage risks within our students

All staff and volunteers must read the CGC Safeguarding Booklet as part of their induction, and complete the required online training. The CGC Safeguarding Booklet makes clear that all staff and volunteers must read at least section one of *Keeping Children Safe in Education*.

2.1 The Role of the Designated Safeguarding Lead (DSL)¹

CGC appoints a senior member of staff to undertake the role of Designated Safeguarding Lead (DSL). The DSL takes lead responsibility for safeguarding and child protection, and supports all staff in fulfilling their safeguarding duty. The DSL has responsibility for ensuring there are policies and processes in place to:

- ensure staff, volunteers and governors are adequately trained to carry out their safeguarding and Prevent duty
- manage concerns that are reported within CGC
- manage referrals to external services, including local authority children’s and adult services
- support staff who make external referrals
- liaise with key professionals and services in multi-agency working model
- ensure child protection files are securely stored and transferred when required

CGC appoints Deputy Designated Safeguarding Leads to support the DSL. The DSL can delegate certain activities to the Deputy DSLs, whilst maintaining lead responsibility. Deputy DSLs must receive appropriate DSL training.

Staff appointed as DSL and Deputy DSLs are detailed in Appendix B – Key Contacts and Information, and can be found in Appendix A – Safeguarding Flowchart.

The DSL also ensures that key areas of risk management have been assessed, and appropriate staff are tasked with their oversight (see table below).

Risk Assessment	Staff responsible for risk management
Managing visitors and external speakers on site	Office and contracts team
Educational visits and enrichment activities	Key stage managers and staff leading the visit

¹ Further information on the Role of the Designated Safeguarding Lead can be found in Annex B of [Keeping Children Safe in Education](#).

Admitting or readmitting students whose behaviour may place other students or staff at risk	Principal, Key stage manager, key stage inclusion panel, relevant external services
Students with health needs and those who require healthcare plans	DSL, Pastoral Manager, Safeguarding Manager
Assessing students who self-harm, who may pose a risk to themselves or others	DSL, Pastoral Manager, Safeguarding Manager, relevant external services

2.2 The role of the Governing Body²

Section 175 of the Education Act (2002), and regulations under section 157 relating to safeguarding pupils in schools, place a duty on the boards of maintained schools and academy trusts to have arrangements in place to ensure that they:

- carry out their functions with a view to safeguarding and promoting the welfare of children; and
- have regard to the statutory guidance issued by the Secretary of State in considering what arrangements they need to make for the purpose of that section.

Furthermore, *Keeping Children Safe in Education* requires all boards to ensure their schools have effective safeguarding policies and procedures in place that take into account local risks, any statutory guidance issued by the Secretary of State, any LA guidance and locally agreed inter-agency procedures.

CGC's governing body appoints a safeguarding governor to take leadership responsibility for the colleges safeguarding arrangements, which includes the Prevent Duty. Key aspects of the safeguarding governor's role include:

- Understand the safeguarding requirements of the college (including relevant policies i.e. Safeguarding and Staff Behaviour/Code of Conduct)
- Ensure that there are effective systems in place to keep vulnerable children safe
- Check that the school is compliant with statutory guidance
- Check whether there is a consistency in safeguarding across the whole school
- Support the work of the Designated Safeguarding Lead
- Ensure suitable training arrangements are in place for governors and staff (including their safeguarding governor role, and the role of the DSL and deputy DSLs).
- Report back to the Governing Body about how effective safeguarding is

The details of the safeguarding governor can be found in Appendix B – Key Contacts and Information.

3. Reporting Concerns

As highlighted earlier in this document, all staff and volunteers have a responsibility to safeguard students. No single professional can have a full picture of a student's needs and circumstances, so if students and their families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Reporting concerns you may have about a student, either from a disclosure a student has made, or from your own observation, is a fundamental part of your safeguarding duty. Any staff member or volunteer who has a concern about a child's welfare should follow the referral processes outlined in this policy.

² Further information can be found in section 6.7 of the [Governance Handbook](#).

3.1 Dealing with disclosures

A student may choose to make a disclosure of concern, harm, abuse or neglect to any staff or volunteer within the college. The following guidelines offer helpful advice for responding to students who make a disclosure.

- **Keep calm and avoid reactions of shock.** Try to ensure your body language remains reassuring.
- **Listen carefully.** Never push for information or ask leading questions. If the student changes their mind about speaking to you, accept their decision and let them know you are always ready to listen.
- **Show acceptance of what you are being told,** even if the information seems unlikely. Do not express disbelief.
- **Never promise confidentiality.** Let them know that you have a professional responsibility to ensure they, and others, are kept safe, which can mean getting the right support. Reassure them you will only tell people you think will be able to help them, and you will tell them when you do that.
- **Assure them they are not to blame and it's not their fault.** They may have been bribed or threatened that they or others will be harmed if they tell anyone.
- **Don't investigate/validate what is being said.** It is not your responsibility to investigate or prove the information being given. Don't use leading questions or probe, but seek to draw the conversation to a satisfactory close as soon as appropriate.
- **Don't talk to the alleged abuser.** Your responsibility is to report the information in an accurate and timely manner through the processes outlined in section 3.2.
- **Explain what you will do next;** that you will report the concern to someone who will be able to help.
- **Report the disclosure accurately and promptly** (see section 3.2).

Helpful things to say

- "Thank you for telling me."
- "It's not your fault."
- "You've done the right thing."
- "I will help you and only tell other people who can help you like me."

Unhelpful things to say

- "What?!? Are you sure?"
- "I can't believe this?"
- "Why did you not tell anyone before?"
- "Why did they do that?"

3.2 Reporting process

Any staff who have a concern about a student must take prompt action, and report those concerns **immediately**. Concerns should be reported to the DSL via the [Safeguarding Form](#), which can be found in the Jostle library and at J:\Safeguarding\Forms\Safeguarding Form. City Gateway Trust staff can access the form on the City Gateway Trust Jostle system.

When reporting a concern, please ensure that:

- The staff member who has a concern or receives a disclosure is the person who completes a report (not a colleague or manager).
- Reports should be written in the first person (i.e. use "I", "my").
- Reports are factual and accurate. Record exactly what the student said (including any slang or terms they used), not your interpretations or assumptions. The reports you make can be used as evidence in court, so ensure they are comprehensive and accurate.

- The date, time, location and context of the disclosure are recorded. It can be helpful to make a note of the student's presentation (appearance, body language, mannerisms etc.).
- Any original notes you or the student made at the time are passed on to the DSL in case they are required for subsequent investigations.

Completed safeguarding forms should then be sent to safeguarding@citygatewayap.org.uk.

If it is an emergency, you can contact the DSL, or in their absence, the Deputy DSLs using the contact information in Appendix B. Any concerns raised verbally will then require a safeguarding form to be completed. If the DSL is implicated in the concerns, follow the guidance in section 3.4 of this policy.

It is the expectation that all concerns will be reported via this process, however all staff need to be aware of the process for making referrals to local authority children's services (see section 3.3 of this policy).

3.3 Local authority Children's Services and Adult Safeguarding contact information

Each local authority has a Local Safeguarding Children's Board (LSCB) that publishes a threshold document, specifying identified levels of need, and the services available to meet those needs. The threshold document should include:

- the process for the early help assessment and the type and level of early help services to be provided;
- the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under:
 - section 17 of the Children Act 1989 (children in need);
 - section 47 of the Children Act 1989 (reasonable cause to suspect children suffering or likely to suffer significant harm);
 - section 31 (care orders); and
 - section 20 (duty to accommodate a child) of the Children Act 1989.
- clear procedures and processes for cases relating to the sexual exploitation of children and young people.

Within this framework, staff are able to refer to Children's Services or Adult Safeguarding services, ideally having discussed their concerns with the DSL. If for any reason the DSL has not been made aware of a referral, they should be informed as soon as possible.

Local authorities may provide advice over the phone (through their Multi-agency Safeguarding Hub (MASH)), but all will require a written referral. This may be through an electronic referral form that needs to be completed, or through an online portal.

The contact details for neighbouring local authorities are detailed below, but any children's services contact information can be found at <https://www.gov.uk/report-child-abuse-to-local-council>.

	Children's Services	Safeguarding Adults
Barking & Dagenham	020 8227 3811 EDT: 0208 594 8356 Email: childrenss@lbbd.gov.uk	020 8227 2915 EDT: 020 8594 8356 Email: intaketeam@lbbd.gov.uk
Greenwich	020 8921 3172	020 8921 2304

	EDT: 020 8854 8888 Email: mash-referrals@royalgreenwich.gov.uk	EDT: 020 8854 8888 Email: aops.contact.officers@royalgreenwich.gov.uk
Hackney	020 8356 5500 EDT: 020 8356 2710 Email: fast@hackney.gov.uk	020 8356 5782 EDT: 020 8356 2300 Email: adultprotection@hackney.gov.uk
Haringey	020 8489 4470/4592/ 5652/ 5762 /4582 (Monday to Thursday 8.45am to 5pm; Friday 8.45am to 4.45pm) EDT: 020 8489 0000	020 8489 1400 EDT: 020 8489 0000 Inter-agency referral form found here
Islington	020 7527 7400 EDT: 020 7527 0992 - (5-9pm, 7 days a week) Email: csctreferrals@islington.gov.uk	020 7527 2299 EDT: 020 7226 0992 Email: access.service@islington.gov.uk
Lewisham	020 8314 6660 EDT: 020 8314 6000 Email: mashagency@lewisham.gov.uk	020 8314 7777 EDT: 020 8314 6000 Email: SCAIT@lewisham.gov.uk
Newham	020 3373 4600 EDT: 020 8430 2000	020 3373 0440 (24hr helpline) Safeguarding Adults form
Redbridge	020 8708 3885 EDT: 020 8708 5897 Email: cpat.referrals@redbridge.gov.uk	020 8708 7333 EDT: 020 8554 5000 adults.alert@redbridge.gov.uk
Southwark	020 7525 1921 EDT: 020 7525 5000 Email: mash@southwark.gov.uk	020 7525 1754 EDT: 020 7525 5000 safeguardingadultscoordinator@southwark.gov.uk
Tower Hamlets	020 7364 5601/3859/5606/2972 EDT: 020 7364 4079 (after 5pm and weekends) Email: mash@towerhamlets.gov.uk	020 7364 5005 EDT: 020 7364 4079 (after 5pm and weekends)

3.4 Allegations against a member of staff

If staff or volunteers have concerns about the safeguarding conduct of a member of staff, including allegations by a student of abuse, this should be reported to the Principal. This includes concerns or allegations relating to the DSL. If the concerns relate to the Principal, this should be reported to the chair of governors (details in Appendix B). The headteacher, or chair of governors, then assumes the role of case manager.

Allegations against a member of staff will be reported to the Local Authority Designated Officer (LADO) who is able to offer advice and guidance to the case manager on how to proceed with management of the allegation. Contact details for the LADO can be found in Appendix B.

Further guidance about managing allegations against staff can be found in part four of *Keeping Children Safe in Education*, and local information relevant to Tower Hamlets can be found in [Procedures for Managing Allegations of Abuse Against Staff Working in Children's, School And Family Settings](#).

3.5 Whistleblowing³

Whistleblowing is the act of raising concerns about wrongdoing, illegal activity or negligence in the workplace. Actions that would give grounds for whistleblowing include:

- a criminal offence
- not obeying the law
- endangering of an individual's health and safety or welfare
- damage to the environment
- improper unauthorised use of public funds or other funds
- a miscarriage of justice has occurred, or is likely to occur
- maladministration, misconduct or malpractice
- actions that pose a risk of harm to children or adults at risk
- covering up of wrongdoing

Whistleblowing relates to concerns with a public interest, that is, the concern affects others (see the [Public Interest Disclosure Act 1998](#)). If staff have a personal grievance, this should be reported by the college's Complaints Policy and Procedures.

Should staff have a concern that falls within the remit of whistleblowing, they are encouraged to express this in order to maintain professional standards within the college and promote the welfare of the college community. They should be confident that these concerns are listened to and taken seriously by the college.

Staff may feel unsure about whistleblowing (perhaps due to concerns of reprisal, victimisation, harassment, loss of working relationship etc.), but they must recognise their responsibility to safeguard the college and its staff and students, and avoid becoming complicit through their inaction. The earlier a concern can be raised, the easier it should be to deal with it.

Whistleblowers are protected by law from victimisation, harassment, unfair treatment and unfair dismissal. If a whistleblower is mistreated by a colleague as a result of whistleblowing, the colleague will face disciplinary action. Confidentiality is assured at the point of making a protected disclosure and will be maintained during investigations and hearings, other than when there is a need for disclosure of identity due to cross examination of the staff member as a witness in any subsequent procedure. Confidentiality will be maintained as far as is possible within the whistleblowing process.

3.5.1 How to raise concerns/whistleblow

Concerns should initially be raised in writing to a line manager or relevant head of department. Staff should set out the background and history of the concern giving names, dates and places where possible, and the reason why they are particularly concerned about the situation. If the employee does not feel able to put their concerns in writing, they should arrange to meet with the Director of Finance and Resources.

If the employees concern relates to their line manager, they should raise their concerns in writing to the Director of Finance and Resources.

What response can be expected?

The action taken by CGC will take depends on the nature of the concern. The matters raised may:

- be investigated by the Head of department

³ Further information on whistleblowing can be found at <https://www.gov.uk/whistleblowing>.

- be investigated by the Director of Finance and Resources, either in conjunction with other CGC employees or separately
- be investigated internally by an appropriately skilled and experienced individual, knowledgeable in the area concerned
- form the subject of an independent enquiry if required

In order to protect individuals, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations that fall within the scope of specific procedures (for example, **child protection** or allegations against a professional or **discrimination**) will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation.

Within ten working days of a concern being received the individual with whom the employee raised the matter will write to the employee:

- acknowledging the concern has been received
- indicating how it is proposed to deal with the matter
- giving an estimate of how long it will take to provide a final response
- telling the employee whether any initial enquiries have been made, and
- telling the employee whether further investigations will take place,
- and if not, the reason why.

The amount of contact between the individual(s) considering the issues and the employee who made the protected disclosure will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from the employee in a discreet manner. When any meeting is arranged, the staff member may be accompanied by a union or workplace representative. The meeting can be 'off site', if requested.

If an employee makes an allegation, but it is not confirmed by the investigation, no action will be taken against that employee. If, however, an employee makes malicious or vexatious allegations, disciplinary action may be taken against them. In determining whether an employee has acted maliciously and/or vexatious the investigator will consider whether the employee was motivated to make the allegation(s) simply out of a desire to pursue a personal vendetta or grudge.

This process is intended to provide staff with an avenue to raise concerns within CGC. We hope anyone invoking this procedure will be satisfied with the response given. If not, the employee should indicate this to the Principal (in the case of delivery based staff) or the Director of Finance & Resources (in the case of support based staff). Should staff or volunteers feel unable to raise concerns within CGC, or feel concerns they have raised have not been addressed, they can contact the NSPCC whistleblowing helpline on 0800 028 0285 (08:00-20:00, Mon-Fri) or email help@nspcc.org.uk.

3.6 SEND students

We acknowledge that students with special educational needs and disabilities (SEND) can face additional safeguarding challenges. We are aware that additional barriers can exist when recognising abuse and neglect in this group of young people. This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration; students with SEN

and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers.

All students at City Gateway College have a One Plan that includes additional SEND concerns that need to be taken into account when assessing safeguarding concerns. Furthermore, those students with an Education, Health and Care Plan (EHCP) will have the information and recommendations contained within their plans taken in to account when managing their safety and welfare, and managing any concerns and risks.

3.7 Looked After Children

Students who are looked after by the local authority are required to have plans and provision in place for their educational achievement. This is coordinated by the virtual school, in partnership with CGC.

Responsibility for the coordination of support for looked after children (LAC) within CGC is held by the designated teacher for looked after children (details of who holds this position can be found in Appendix B). The designated teacher will oversee that all looked after students at CGC have a high quality Personal Education Plan (PEP) in place in line with statutory guidance, and CGC is present at relevant LAC review meetings. These responsibilities can be delegated to suitably trained staff.

3.8 Private Fostering Arrangements⁴

The *Replacement Children Act 1989 Guidance on Private Fostering* provides the following definition:

“A private fostering arrangement is essentially one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. Private foster carers may be from the extended family, such as a cousin or great aunt. However, a person who is a relative under the Children Act 1989 i.e. a grandparent, brother, sister, uncle or aunt (whether of the full or half blood or by marriage) or step-parent will not be a private foster carer. A private foster carer may be a friend of the family, the parent of a friend of the child, or someone previously unknown to the child’s family who is willing to privately foster a child. The period for which the child is cared for and accommodated by the private foster carer should be continuous, but that continuity is not broken by the occasional short break. Exemptions to this definition are set out in Schedule 8 to the Children Act 1989...The private foster carer becomes responsible for providing the day to day care of the child in a way which will promote and safeguard his welfare. Overarching responsibility for safeguarding and promoting the welfare of the privately fostered child remains with the parent or other person with parental responsibility. Local authorities do not formally approve or register private foster carers. However, it is the duty of local authorities to satisfy themselves that the welfare of children who are, or will be, privately fostered within their area is being, or will be, satisfactorily safeguarded and promoted. It is the local authority in whose area the privately fostered child resides which has legal duties in respect of that child.”

If a member of staff or volunteer at CGC becomes aware that a student may be in a private fostering arrangement, where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation

⁴ Further guidance on private fostering can be found in Annex E of [Keeping Children Safe in Education](#).

by someone to whom they are not related in that person's home, they should raise this to the DSL. CGC will then notify the local authority of the circumstances, to enable the local authority to check that the arrangement is suitable and safe for the student.

Currently, CGC does not arrange any trips or learning experiences that amount to private fostering.

4. Identifying concerns and risks

CGC staff and volunteers need to be aware of the types of abuse and neglect so that they are able to identify students who may be in need of help or protection. They are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned, so that prompt action and support can be implemented. Knowing what to look for is vital to the early identification of abuse, neglect and safeguarding risks (outlined in section 4 of this policy). If staff members are unsure about any concerns they have, they should speak to the DSL or Deputy DSLs. Further information can also be found in the guidance [*What to do if you're worried a child is being abused*](#).

4.1 Early Help⁵

Early help means providing support as soon as a problem emerges, and all staff and volunteers are key in identifying concerns and risks at an early stage. These concerns should be reported through the normal reporting processes (outlined in section 3.2) so that an appropriate plan of action can be agreed. This may involve sharing information and liaising with other professionals and services, completing an Early Help Assessment (EHA)/Common Assessment Framework (CAF), and in some cases, acting as the lead professional to coordinate these actions.

Staff can contact the Tower Hamlets Early Help Hub for advice and support (contact details in Appendix B).

4.2 Definitions and signs of abuse and neglect⁶

Sexual Abuse	Emotional Abuse
<p>Definition: Forcing or enticing a child or young person to take part in sexual activities. This may involve physical contact (penetrative and non-penetrative) and non-contact e.g. watching or producing sexual images, encouraging sexualised behaviour, grooming and exploitation.</p> <p>Signs/Indicators</p> <ul style="list-style-type: none"> Any allegations made by a child concerning sexual abuse A child with excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour, or who engages in age-inappropriate sexual play Sexual activity through words, play or drawing Repeated urinary infections or unexplained abdominal, 'tummy' pains Child who is sexually proactive or seductive with adult 	<p>Definition: Actual or likely severe adverse effect on the emotional and behavioural development of a child caused by persistent or severe emotional ill treatment or rejection. All abuse involves some emotional ill-treatment. This category is used where it is the main or sole use of abuse.</p> <p>Signs/Indicators</p> <ul style="list-style-type: none"> Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy. Also depression, aggression and extreme anxiety Highly aggressive or cool to others Nervousness, frozen watchfulness, persistent tiredness Obsessions or phobias Sleep or speech disorders Negative statements about self

⁵ Further information on Early Help is available in Chapter 1 of [*Working Together to Safeguard Children*](#).

⁶ Comprehensive information on abuse and neglect is available from the [*NSPCC*](#).

<ul style="list-style-type: none"> • Inappropriate relationships with peers and or adults • Severe sleep disturbances with fears, phobias, vivid dreams or nightmares • Eating disorders • Evidence of grooming by individuals or groups of adult 	<ul style="list-style-type: none"> • Extreme shyness or passivity • Sudden under-achievement or lack of concentration • Inappropriate relationships with peers or adults • Attention seeking behaviour • Running away, stealing, and lying
Physical Abuse	Neglect
<p>Definition: Actual or likely physical injury to a child, or failure to prevent physical injury (or suffering) to a child, including deliberate poisoning, suffocation and fabricated or induced illness.</p> <p>Signs/Indicators</p> <ul style="list-style-type: none"> • Any injuries not consistent with the explanation given for them • Injuries which have to receive medical attention • Injuries which have not received medical attention (but should have) • Injuries that occur to places on the body not normally exposed to accidents • Reluctance to change for, or participate in, games or swimming • Bruises, bites, burn, fractures etc. which do not have an accidental explanation • Child gives inconsistent accounts for the causes of injuries 	<p>Definition: The persistent or severe neglect of a child or the failure to protect a child from exposure to any kind of danger, including cold and starvation or extreme failure to carry out important aspects of care, resulting in the significant impairment of the child's health or development, including non-organic failure to thrive.</p> <p>Signs/Indicators</p> <ul style="list-style-type: none"> • Dirty skin, body smells, unwashed, uncombed hair and untreated lice • Under nourishment • Clothing that is dirty, too big or small, or inappropriate for weather conditions • Frequently left unsupervised or alone • Frequent diarrhoea • Frequent tiredness • Untreated illnesses, infected cuts or physical complaints which the carer does not respond to • Frequently hungry • Stealing or gorging food, overeating junk food

4.3 Preventing Extremism and Radicalisation⁷

Under section 26 of the Counter-Terrorism and Security Act 2015, CGC recognises its duty to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. Similar to our responsibility to safeguard students against other forms of harm, the prevent duty highlights the need to safeguard students from being drawn into a process by which they come to support extremism and terrorism, including the risk of travelling to conflict zones; a process known as radicalisation. This involves being alert to students who may be vulnerable to this process, whilst also developing their resilience to manage these, and other, risks.

The process by which someone is radicalised can be very varied, making identification challenging. All staff and volunteers complete the [e-learning training](#) from the Home Office as part of their induction, to equip them with the foundational knowledge they require. Further training and resources are then available to support professional development, and the service offered to students. Staff and volunteers need to use their professional judgement when identifying and risk assessing concerns about radicalisation, but some signs to be alert to include:

- Students becoming increasingly argumentative and unwilling to listen to other's point of view. They may exhibit prejudice-based language or behaviour (e.g. based on race, religion, gender or sexuality).
- They may feel persecuted or wronged, and may develop an 'us and them' narrative.

⁷ Further information can be in [The Prevent Duty – Departmental advice for schools and childcare providers](#).

- Susceptibility to conspiracy theories and unsubstantiated new stories/digital content.
- Out of character changes in dress, behaviour and peer relationships.
- Excessive time spent online, secretive about their online activity, and/or may have multiple profiles.
- Glorifying violence
- Evidence of possessing illegal or extremist literature
- Showing sympathy for extremist causes
- Associating with known extremist individuals or groups

If staff have any concerns regarding extremism and radicalisation, they should be reported through the usual reporting processes outlined in section 3.2. The DSL will then agree an appropriate course of action, which may involve intervention from CGC staff, work with the student's carer(s), liaison with the local Prevent coordinator, and/or a referral to the Social Inclusion Panel/Adult Safeguarding Board (Tower Hamlet's Channel panel provision) or the police.

The Prevent duty is not intended to avoid or demonise difficult topics related to extremism. In fact, schools and colleges are recognised as important spaces in which these topics can be discussed. CGC recognises the responsibility it has to develop our student's resilience and sense of citizenship through our curriculum. An important part of this is a thorough exploration and promotion of the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs, as part of our students spiritual, moral, social and cultural development. In addition, the skills of critical thinking and digital resilience are explored in the curriculum, to highlight the risks that have been identified with digital mediums and content. Information and resources to support staff, volunteers and carers in protecting young people can be found at educateagainsthate.com. Further information on CGC's management of the Prevent duty can be found in the Preventing Extremism and Radicalisation policy.

4.4 Child Sexual Exploitation (CSE)⁸

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Services and professionals have become increasingly aware of the prevalence and harm of CSE, and therefore all staff are asked to be vigilant to its risks and potential indicators. Potential indicators of CSE include:

- Acquisition of money, clothes, mobile phones etc without plausible explanation;
- Gang-association and/or isolation from peers/social networks
- Exclusion or unexplained absences from school, college or work
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/phone calls
- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age/sexually transmitted infections
- Evidence of/suspicious of physical or sexual assault
- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work

⁸ Further information can be found in the [Child Sexual Exploitation](#) guidance.

- Concerning use of internet or other social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional well-being

In addition to identifying signs and symptoms of CSE, it is also helpful for staff to have an awareness of vulnerabilities that may make a young person more at risk of CSE. It must be remembered that not all children with these indicators will be exploited, and CSE can occur without any of these issues.

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

If staff or volunteers have any concerns regarding CSE they should be reported through the usual reporting processes outlined in section 3.2. Staff may then be directed to submit a referral to the Tower Hamlets Multi-agency Sexual Exploitation (MASE) panel through the MASE referral form that is available on Jostle.

4.5 Children missing from education⁹

A student missing from education is a potential indicator of abuse or neglect and such students are at risk of being victims of harm. CGC recognises that if a student is not attending education they are at greater risk of harmful concerns i.e. CSE, radicalisation and extremism (including travelling to conflict zones), criminal exploitation, trafficking, and being NEET (not in education, employment or training).

Effective attendance and registration policies and procedures are an important part of our safeguarding practices (see Attendance and Punctuality policy and Attendance and Truancy policy). These policies and procedures ensure:

- Students are registered within every session, and any non-attendance reported to carer(s).
- Staff are aware of the risks posed to students not being in education (see above).
- Poor or irregular attendance will be managed with effective liaison between staff, students, carers, and suitable partner agencies and services (e.g. Attendance and Welfare service, Outreach service, Targeted Youth Support, Parental Engagement Team, Children's Social Care).
- We inform the local authority when we plan to take students off-roll when they:
 - leave school to be home educated
 - move away from the school's location
 - remain medically unfit beyond compulsory school age
 - are in custody for four months or more (and will not return to school afterwards)
 - are permanently excluded
- We record the name of a student's new school and their start date when they leave CGC.

⁹ Further information can be found in the [Children Missing Education](#) guidance.

4.6 Female Genital Mutilation (FGM)¹⁰

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. 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 (along with regulated health and social care professionals) 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.

Staff and volunteers should be vigilant to the vulnerabilities and potential warning sign that FGM may occur. These include:

- students planning a long holiday abroad, or going 'home' to visit family
- a relative or cutter visiting from abroad, or talk of a female elder visiting from abroad
- a special occasion/ceremony/procedure to 'become a woman' or get ready for marriage
- a female relative being cut – a sister, cousin, or an older female relative such as a mother or aunt
- low integration in to UK society

Indications that FGM may have already taken place may include:

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

If any staff or volunteers discover that a student under the age of 18 has undergone FGM, they should report it through the CGC safeguarding processes, but teachers should understand that they will be supported to report the case to the police in line with the duty mentioned previously. The duty does not apply in relation to at risk or suspected cases or in cases where the woman is 18 or over. In these cases, staff should follow CGC safeguarding processes.

4.7 So-called 'honour-based' violence (HBV)

So-called 'honour-based' violence (HBV) is a term used to describe crimes committed against a woman or a girl (or sometimes men) who the family or the community feels has not followed what they believe is acceptable behaviour and has brought dishonour or shame to the family. These crimes may include FGM, forced marriage, practices such as breast ironing, abduction, physical and sexual assault, or in extreme cases, even murder.

Some common behaviours that families and communities may deem 'dishonourable' include:

- defying their parents
- talking to a male who is not related to the family
- seeking a divorce or seeking residence of the children after divorce
- refusing to marry a man chosen by the family (rejecting a forced marriage)

¹⁰ Further information can be found in [Multi-agency statutory guidance on female genital mutilation](#).

- sexual relationships or pregnancy before or outside of marriage (including kissing or intimacy in public)
- becoming 'western' (wearing make-up or clothes deemed inappropriate, having male friends or boyfriends from another faith etc.)
- gossip (rumours can damage the 'honour' of a family)
- using drugs or drinking alcohol
- being sexually assaulted or raped
- being LGBT

All forms of so-called HBV are abuse (regardless of the motivation) and must be reported via the CGC safeguarding processes. Staff and volunteers need to be alert to the possibility of a student being at risk of HBV, or already having suffered HBV.

4.8 Peer on peer abuse

CGC recognises that risks posed to students may come from their peers, both in and outside of CGC. This can include, but is not limited to, bullying (including cyberbullying), gender-based violence/sexual assault, physical assault, sexting (see section 4.9) and exploitation/grooming (both CSE and criminal exploitation). All incidents of peer on peer abuse should be recognised for the harmful actions they are, and never tolerated or dismissed as "banter" or "part of growing up". Neither should these incidents be seen as gendered norms, e.g. girls being sexually touched/assaulted or shamed on social media, or boys being subject to initiation/hazing type violence or sexual activity.

Challenging behaviour is dealt with through the processes outlined in the Behaviour policy and Anti-bullying and Harassment policy, but there may be occasions where more serious incidents require handling in a peer on peer abuse framework. Such occasions may involve elements of:

- a power imbalance; older or more confident students targeting more vulnerable students
- an incident being of a serious nature, possibly including a criminal offence
- raising risk factors for other students in the school
- indicating that other students may have been affected by this student/incident
- indications that young people outside the school may be affected by this student

The risk of peer on peer abuse is minimised by having behavioural expectations made clear through displays in every classroom, included as part of every students induction, requiring students to sign a 'Student Agreement', developing positive peer relationships through classroom activities and enrichment experiences, and overcoming barriers through the Active Citizenship and Enterprise programme. Furthermore, staff know to be alert to early warning signs of animosity and tension between students, and will seek to reconcile any grievances through a restorative justice process. This may involve the involvement of carer(s) and any appropriate professionals working with the student/their family.

Should incidents of peer on peer abuse happen, CGC will support the victim(s) by:

- ensuring they are made safe in the event of an incident, and taken to a safe environment on site
- providing any medical support they may require, including accompanying them to hospital
- ensuring they are listened to, and producing a written account of their experience
- seeking their views on what follow up actions are taken re. them and the perpetrator(s)
- communicating what has happened to their carer(s), and involving them in follow up arrangements
- supporting restorative justice reconciliation where appropriate and possible
- liaising with the police/Youth Offending Service/Probation Service where required (including reporting incidents to the police if the student is willing

- offering suitable follow up services relevant to the incident (e.g. Victim Support, counselling, mentoring)

4.9 E-safety

New technologies, digital mediums and digital content provide many benefits and opportunities for learning, but also pose opportunities for risks. These risks can be summarised in to:

- **Content**
 - exposure to inappropriate content, including online pornography, extremist material, substance abuse
 - lifestyle websites promoting harmful behaviours (e.g. pro-anorexia)
 - hate content
 - content validation: how to check authenticity and accuracy of online content
- **Contact**
 - grooming (sexual exploitation, radicalisation etc.)
 - online bullying in all forms
 - social and commercial identity theft, including passwords
 - security breach of the ICT infrastructure
- **Conduct**
 - aggressive, hateful behaviour and cyber bullying
 - sexting (sending and receiving of personally intimate images) also referred to as SGII (self-generated indecent images)
 - revenge porn (the sharing of private, sexual material of another person without their consent with the purpose of causing embarrassment or distress)
 - privacy issues, including disclosure of personal information
 - digital footprint and online reputation
 - health and well-being (amount of time spent online)
 - copyright (little care or consideration for intellectual property and ownership – such as music and film)

Incidents of sexting can have serious and far-reaching effects on students and the wider college community. CGC utilises the guidance [Sexting in schools and colleges, responding to incidents, and safeguarding young people](#) in avoiding these incidents, and managing them should they occur. The guidance adopts the term 'Youth produced sexual imagery' as this is clearer than sexting. It highlights the material being discussed in this context:

- Is produced by, shared by, or in possession of someone under 18 (either of themselves or another person under 18).
- Is sexual in nature i.e. if imagery contains a naked young person, a topless girl, and/or displays genitals or sex acts, including masturbation. It may also include overtly sexual images of young people in their underwear.
- Comprises both still images and videos.

The Protection of Children Act 1978 as amended in the Sexual Offences Act 2003 makes it an offense to possess, distribute, show or make indecent images of children (which is anyone under the age of 18). This law was designed to protect children from adults, however does mean under 18s who take, share or possess images of themselves or peers are breaking the law. Within this context the National Police Chiefs Council have recommended that incidents of this nature are primarily treated as a safeguarding issue to avoid unhelpful criminalisation of children, and have produced [operational advice](#) for law enforcement to support this.

CGC takes the following steps when handling incidents of youth produced sexual imagery:

1. **Reporting** - All concerns or disclosures need to be reported to the DSL using the safeguarding processes. Ensure the DSL is aware the concern has been raised by telephoning or speaking to them in person.
2. **Initial review meeting** - The DSL will conduct an initial review meeting with appropriate staff. This meeting considers:
 - Whether there is an immediate risk to a young person or young people
 - If a referral should be made to the police and/or children's social care*
 - If it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery should not be viewed
 - What further information is required to decide on the best response
 - Whether the imagery has been shared widely and via what services and/or platforms. (This may be unknown.)
 - Whether immediate action should be taken to delete or remove images from devices or online services
 - Any relevant facts about the young people involved which would influence risk assessments
 - If there is a need to contact another school, college, setting or individual
 - Whether to contact carer(s) of the pupils involved - in most cases carer(s) should be involved

** An immediate referral to police and/or children's social care will be made at this initial stage if:*

- *the incident involves an adult*
- *there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)*
- *what we know about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent*
- *the imagery involves sexual acts and any child in the imagery is under 13*
- *we have reason to believe a student is at immediate risk of harm owing to the sharing of the imagery e.g. they are presenting as suicidal or self-harming.*

3. **Interviews and assessments** - The DSL (and other delegated staff) will follow agreed actions from the initial meeting, including interviewing the students involved, to establish the facts and assess the risks. The following areas will be considered:
 - Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
 - Who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the pupil in the imagery?
 - Are there any adults involved in the sharing of imagery?
 - What is the impact on the students involved?
 - Do the students involved have additional vulnerabilities?
 - Does the young person understand consent?
 - Has the young person taken part in this kind of activity before?
4. **Informing carer(s)** - Carer(s) will be informed at the earliest opportunity, unless to do so puts the student at risk of harm. Any decision not to inform the carer(s) would generally 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 the carer(s) should be informed. Staff may work with the student involved to decide on the best approach for informing carer(s).

- 5. Handling devices and imagery** - The 2011 Education Act updated schools powers to confiscate items, including electronic devices. It permits the searching for, and of, devices where there are concerns such devices may contain inappropriate content, by staff authorised by the Principal¹¹. Authorised staff may examine data or files, and delete these where there is good reason to do so (parental consent is not required). However, where possible adults should **not** view youth produced sexual imagery. Staff should seek to ascertain the content of such imagery through conversations with the student, ascertain who is involved in the incident, and find out to what extent the image has been shared. Staff should encourage students to delete imagery and confirm to them that this has happened.

The decision to view imagery should be based on the professional judgement of the DSL. If a decision is made to view imagery, the DSL would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- is unavoidable because a pupil has presented an image directly to a staff member or the imagery has been found on a school device or network
- will not cause significant distress or harm to the pupil

If it is necessary to view the imagery then the DSL should:

- Never copy, print or share the imagery; this is illegal.
- Discuss the decision with the Principal.
- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Principal.
- Ensure viewing takes place with another member of staff present in the room, ideally the Principal or a member of the senior leadership team. This staff member does not need to view the images.
- Wherever possible ensure viewing takes place on college premises, in as private a space as possible.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery.
- Record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions

If the DSL finds material which concerns them and they reasonably suspect the material has been or could be used to cause harm or commit an offence, they can decide whether they should delete the material or retain it as evidence of a criminal offence or a breach of college discipline. If the DSL decides that other agencies do not need to be involved, then imagery should be deleted from devices and online services to limit any further sharing of the imagery.

- 6. Recording incidents** - All incidents at CGC relating to youth produced sexual imagery need to be recorded, including the decisions that were made, and the reasons for making them. This includes

¹¹ Further information can be found in

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/554415/searching_screening_confiscation_advice_Sept_2016.pdf.

incidents that have been referred to external agencies and those that have not. Where we do not refer incidents out to police or children's social care, CGC should record the reason for doing so and ensure that this is signed off by the Principal.

CGC is committed to educating its students to the risks and considerations of e-activity, and particularly the legal and emotional consequences of involvement with youth produced sexual imagery.

5. Staff conduct and professionalism

Staff conduct is instrumental in creating a safe and secure learning environment for students, and putting in to practice our safeguarding duty and principles. A consistent, caring and professional approach from staff supports the safety and wellbeing of our students, and is of the highest importance in light of the vulnerabilities and complexities experienced by our students.

All staff must read and sign the Professional Standards at City Gateway College, and adhere to them throughout their professional conduct. The professional standards outline the required conduct of staff across the areas of: Duty of care, Exercise of Professional Judgement, Power and Positions of Trust, Confidentiality, Propriety and Behaviour, Dress and Appearance, Gifts, Infatuations, Personal Living Space, Communications with Students (including the use of technology), Social Contact, Social Networking Sites and Online Gaming, Physical Contact, Physical Education and other activities which require physical contact, Showers and Changing, Students in Distress, Behaviour Management, Care, Control & Physical Intervention, Sexual Contact with Students, One to One Situations, Transporting Children, Extra-curricular activities, First Aid and Administration of Medication, Intimate Care, Curriculum, Photography, Videos and other Creative Arts, Internet Use, Whistleblowing, and Sharing Concerns & Recording Incidents.

Staff conduct and professionalism allows for secure and supportive relationships to be built with students within a protective and respectful framework. Failure to adhere to the Professional Standards can have serious and damaging consequences for staff, visitors and students and is not tolerated within CGC.

6. Incident Management

As part of CGC's commitment to providing a safe learning environment for staff and students, our Behaviour Policy outlines how positive behaviour is encouraged within the college, and challenging behaviour is managed within a robust framework.

There may be occasions when larger scale incidents occur, and the effective management and support of all staff helps ensure these are dealt with effectively and quickly, to minimise the disruption and risk posed to others. All staff and volunteers need to be familiar with our incident management processes, to promote the safety and wellbeing of the CGC community and our neighbours, which can be found in Appendix 1 of the CGC Behaviour Policy. This outlines that the Duty Lead (usually the Key Stage Manager or Pastoral Lead) will take responsibility for managing an incident and its follow up, so staff should follow their directions in the event of an incident.

Should a critical incident occur (e.g. malicious attack on the college, large scale loss of amenities, terrorist incident in the local area), the senior leadership team will follow the protocols contained in the CGC Critical Incidents Plan.

7. Offsite Visits and Residentials

CGC's safeguarding duty is not limited to school sites, but explicitly applies while students are in our care. This includes offsite visits, volunteering opportunities, residentials and any occasion where staff may be offsite with a student (e.g. a 1:1 session or de-escalation action).

In order to effectively safeguard our students, staff must adhere to the following guidelines:

- Avoid going offsite with a student on your own. There should always be at least two members of staff, and sufficient numbers to effectively manage the size of the group.
- If, on rare occasions, you are offsite on your own, ensure your manager is aware of your location and the reasons why you are offsite with a student. You must be contactable by phone, ensure your manager has the number, and return to site as soon as possible.
- **All** planned offsite visits and residentials must have the following in place:
 - Written consent from parents/carers
 - Emergency contact information for each student
 - A completed risk assessment
 - Written medical information and health care plans for relevant students
 - A first aid kit and any required medication
 - A qualified first aider
 - Dietary information for students
 - Any required food and drink, and the means to safely transport it
- Ensure carer(s) are aware when their child will be offsite, and where they will be.

Comprehensive information on managing off site visits and residentials can be found in the CGC Day Trips and Residential Policy.

8. Confidentiality and Information Sharing¹²

CGC recognises that it has legal and ethical obligations of confidentiality when it comes to the personal information of staff, volunteers, students, and their families. All these groups must be confident that CGC gathers, manages, stores, and shares their information responsibly and appropriately.¹³

Students can expect to receive a confidential service at City Gateway, which means information they give us will not be shared unnecessarily, and only with those where there is sufficient reason to share it. All staff and volunteers should make clear in their introductions with students the trustworthiness of their professional conduct, but also the limitations of their confidentiality. Students must know that staff and volunteers have a professional responsibility to pass on information to suitable staff to support students welfare and safety, and if they have any concerns that the student, or someone else, may be at risk of harm. Staff should let students know when they need to do that, so that the student does not feel misled or disempowered.

Information sharing is a fundamental element of safeguarding children, young people and adults at risk, and poor information sharing has been repeatedly highlighted as an issue in serious case reviews following the death of, or serious injury to, a child. CGC follows the information sharing general principles to ensure sharing of information is:

¹² Further information and guidance can be in [Information Sharing: Advice for practitioners](#).

¹³ Comprehensive information can be found in CGC's *Confidentiality Policy*.

- **Necessary and proportionate** - When taking decisions about what information to share, you should consider how much information you need to release. The Data Protection Act 1998 requires you to consider the impact of disclosing information on the information subject and any third parties. Any information shared must be proportionate to the need and level of risk.
- **Relevant** - Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make sound decisions.
- **Adequate** - Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.
- **Accurate** - Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.
- **Timely** - Information should be shared in a timely fashion to reduce the risk of harm. Timeliness is key in emergency situations and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore harm to a child. Practitioners should ensure that sufficient information is shared, as well as consider the urgency with which to share it.
- **Secure** - Wherever possible, information should be shared in an appropriate, secure way. Practitioners must always follow their organisation's policy on security for handling personal information.
- **Record** - Information sharing decisions should be recorded whether or not the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom, in line with organisational procedures. If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester. In line with each organisation's own retention policy, the information should not be kept any longer than is necessary. In some circumstances this may be indefinitely, but if this is the case there should be a review process.

Within this context we communicate to students the remit of confidentiality and information sharing through our verbal interactions and support, our student paperwork and agreement, and displays within our classrooms and around the site.

9. Safer Recruitment

CGC recognises it's responsibility to ensure that staff, volunteers and other adults on site do not pose a risk to students, and all necessary safety and suitability checks have been carried out. Safer recruitment is vital in guaranteeing the suitability of adults that come in to contact with students in order to ensure student safety. Our safer recruitment processes are detailed within the CGC Safer Recruitment policy.

By way of an overview, CGC ensures it accurately advertises any available roles, and makes clear the expectations of the checks involved. These checks include:

- an identity check
- an enhanced DBS check/certificate
- a barred list check
- a check of professional qualifications
- a check to establish the person's right to work in the United Kingdom
- further checks on people who have lived or worked outside the UK
- a prohibition from teaching check (where relevant to the role)
- a section 128 check (where relevant to the role and responsibilities)

Alongside these checks, CGC ensures that at least one member of an interview pane has received safer recruitment training, and all appointments are subject to two satisfactory references.

These checks are required for staff (including temporary staff, agency staff and trainee teachers) and volunteers who will be undertaking regulated activity¹⁴. Someone will be considered to be engaging in regulated activity if, as a result of their work, they:

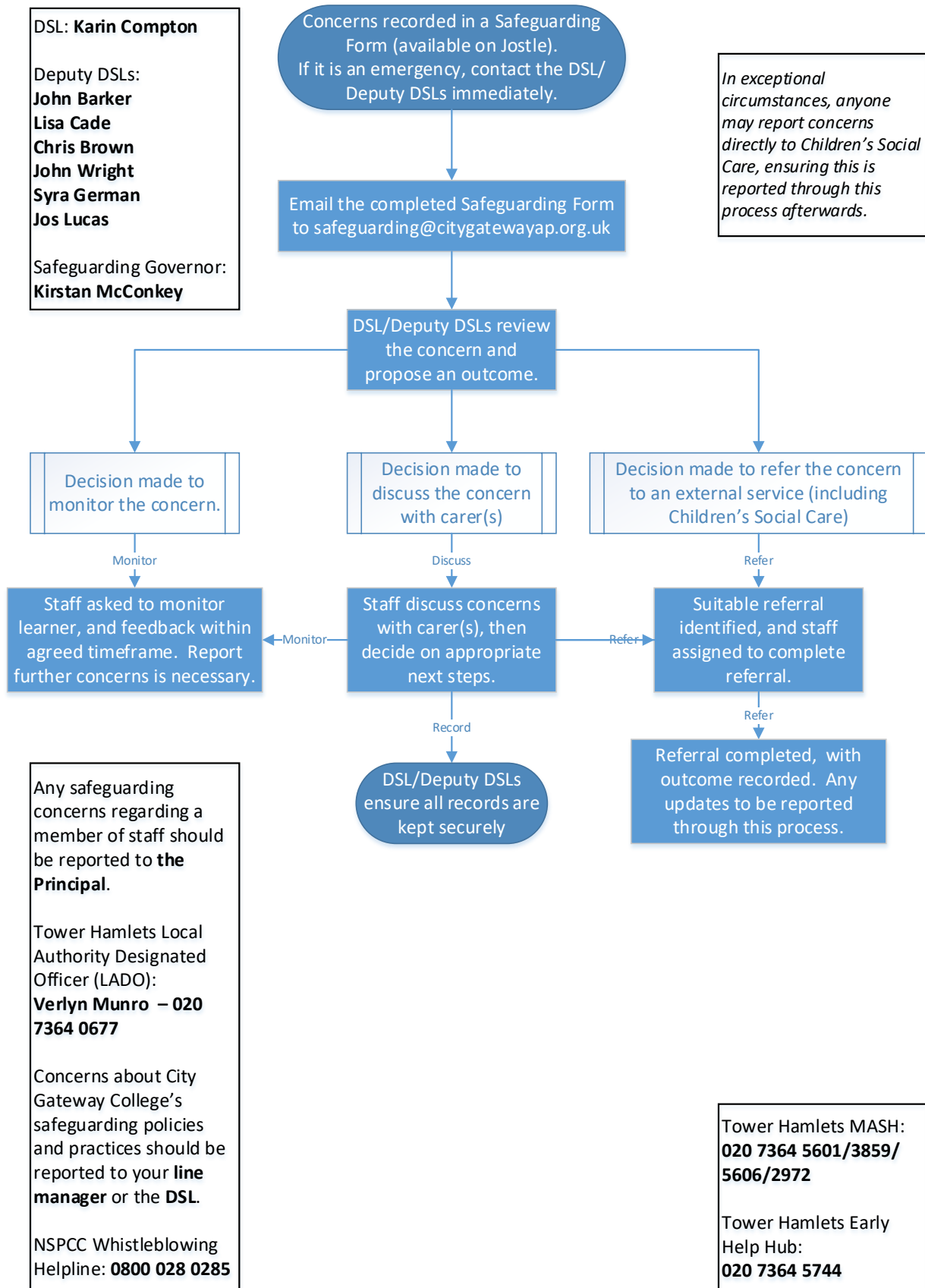
- will be responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- will carry out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- engage in intimate or personal care or overnight activity, even if this happens only once.

Due to the high likelihood of staff and volunteers undertaking regulated activity, they will be required to undertake an enhanced DBS check and barred list check. Contractors who are working on site will be subject to an enhanced DBS check, but not a barred list check.

Visitors to the site will be required to sign in at the main reception where they will be given information relating to the conduct requirements around CGC, and information on our safeguarding processes. Visitors are required to wear a visitors lanyard, and will be supervised by staff at all times while they are on site.

¹⁴ A full description of regulated activity can be found in the factual note [Regulated activity in relation to children: scope](#).

Appendix A – Safeguarding Flowchart for managing concerns about a student



Appendix B – Key Contacts and Information

Designated Safeguarding Lead: Karin Compton: 020 3727 6263

Deputy Designated Safeguarding Leads

John Barker: 07958 172173

Lisa Cade: 07947 569785

Chris Brown: 020 3727 6268

John Wright: 0203 727 6250

Syra German: 07507 098621

Jos Lucas: 0203 727 6300

Chair of Governors: Jacquie Driver

Safeguarding representative on the Board of Governors: Kirstan McConkey

Designated Teacher for Looked After Children: Karin Compton

Tower Hamlets MASH (Children's Social Care): 020 7364 5601/3859/5606/2972

Tower Hamlets Early Help Hub: 020 7364 5744

Tower Hamlets Adult Safeguarding Service: 020 7364 5005

Tower Hamlets LADO: Verlyn Munro: 020 7364 0677

NSPCC Child Protection Helpline: 0808 800 5000

NSPCC Whistleblowing Helpline: 0800 028 0285

Anti-Terrorist Hotline: 0800 789 321

Department for Education Prevent Helpline: 020 7340 7264

Childline

Tel: 0800 1111

For further support services please reference J:/ Safeguarding/Forms/Safeguarding Referral Directory.

Appendix C – Safeguarding Form

Safeguarding Form

CONFIDENTIAL DOCUMENT

Please complete this form as fully as you are able. Once the form is filled in, follow these steps:

1. Save this file to your Desktop with a name using the following format:
YYYY-MM-DD-<Initials of Young Person>.doc
e.g. 2016-08-24-JR.doc
2. Close the document in word.
3. Email the completed form to safeguarding@citygatewayap.org.uk.
4. Delete the form from your desktop.

Date and Time of Incident:

Date and Time of Reporting:

Location and Context of Incident:

Name of Young Person:

Date of Birth:

Address:

KS4 ☐ 16-19 ☐

Details of any family and/or household members that are involved in a CGC project (please state which project):

Details: sequences of events, actual words used, observations etc.:

Name of person completing this form: