



Safeguarding & Child Protection Policy 2025-2026

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• Policy principles

This policy informs staff, students and visitors about the College's commitment to safeguarding and child protection. The policy has been reviewed in light of the 'Keeping Children Safe in Education 2025' guidance from the Department for Education, 'Statutory Guidance and Information for Schools and Colleges' and Prevent Duty Guidance 2015 (updated 2019).

The College's safeguarding arrangements are inspected by Ofsted under all the key judgements.

Our core safeguarding principles are:

- the responsibility to safeguard and promote the welfare of young people is of paramount importance
- safer students make more successful learners
- the voice of the child will be heard and the college will always act in the best interest of our students
- policies will be reviewed annually unless an incident or new legislation or guidance suggests the need for an interim review
- all young people, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- all staff have an equal responsibility to act on any suspicion or disclosure that may suggest a student is at risk of harm
- there is a culture of transparency, openness and, if needed, challenge with regard to maintaining high standards in safeguarding
- students and staff involved in safeguarding issues will receive appropriate support and supervision
- students will be taught about safeguarding (including Online safety) as part of the wider curriculum.

Carmel College takes seriously its duty to safeguard and promote the welfare of all students. The College will take all reasonable measures to ensure that any risk of harm to students' health is minimised and will take all possible action to address concerns about the welfare of any student or students, in full partnership with other local agencies.

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where young people are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that the students receive effective support, protection and justice. The procedures contained in this policy apply to all staff and governors and are consistent with those of the St Helens Safeguarding Children Partnership Board procedures (LSCPB).

The Safeguarding Team fully understands the role of the college within the three safeguarding partners (the local authority, the clinical commissioning group and the police).

The College is committed to an open and positive **culture** of safeguarding that always works in the best interests of the child. This means the college aims to protect young people from serious harm, both offline and online, by always maintaining the attitude that 'it could happen here'. The college engages in open and transparent information sharing and actively seeks expert advice when required, accepting challenge to ensure the right decisions are made. The DSL ensures that all staff are trained well to ensure they understand their responsibilities and the systems and processes that the college operates empower staff to 'speak out' where there may be concerns. As a college, we actively seek the views and lived experiences of our students, parents/carers and staff taking prompt, but proportionate, actions to address any concerns, where needed. The child protection arrangements in place allow staff to identify students who may need early help, who are at risk of harm or who have been harmed and subsequently securing the help that young person needs, and if required, refer to external agencies in a timely way to those who have the expertise to help. The college has a robust approach to safer recruitment and allegations made about adults who may be a risk to students. We are receptive to challenge and reflective of our own practices to ensure that safeguarding policies, systems and processes are kept under continuous review.

In line with the guidance this is an individual policy for Carmel College. This policy endeavours to meet the needs of young people across the multiple boroughs recruited from and recognises that there are particular issues that may affect this age group particularly in their social settings beyond college, within the guidance this is classed as contextual safeguarding.

Policy aims

- To provide all staff with the necessary information to enable them to meet their safeguarding responsibilities
- To ensure consistent good practice and continuous improvement
- To demonstrate the College's commitment with regard to safeguarding students, parents and other partners

Terminology

The terms “**children**” and “**child**” refer to anyone under the age of 18.

For the purposes of this policy, “**safeguarding and protecting the welfare of children**” is defined as:

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

Child protection refers to the processes undertaken to protect children who have been identified as suffering, or 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.

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

Vulnerable adult is a student who is aged 18 or over and who is, or may be, in need of community services due to age, illness or a mental or physical disability, who is, or maybe, unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.

Review and Monitoring Procedures

It will be the responsibility of the DSL and DDSL to review and monitor the procedures and to seek the advice of the LSCPB in bringing about changes in the agreed procedures in conjunction with SLT.

Procedures will be monitored and evaluated by: -

- Governing Body – annually
- Student Voice/ focus groups
- Logs of bullying, racist incidents and safeguarding-related issues by staff

• **Carmel College mission statement**

Our Mission is to be a centre of educational excellence, opportunity, challenge and support within a caring Christian environment.

• **Safeguarding legislation and guidance**

Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.

The Teacher Standards 2012 state that teachers, including Principals should be responsible for safeguarding children’s wellbeing and maintain public trust in the teaching profession as part of their professional duties.

The statutory guidance Working Together to Safeguard Children 2023 covers the legislative requirements and expectations on individual services (including schools and colleges) to safeguard and promote the welfare of children. It also provides the framework for Local Safeguarding Children Partnership Boards (LSCPB’s) to monitor the effectiveness of local services, including safeguarding arrangements in colleges.

The statutory guidance Keeping Children Safe in Education 2025 is issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) (England) Regulations 2010 (as

amended by SI 2012/2962) and the Education (Non-Maintained Special Schools) (England) Regulations

2011. Schools and colleges must have regard to this guidance when carrying out their duties to safeguard and promote the welfare of children.

From 1 July 2015 all schools, registered early years childcare providers and registered later years childcare providers (referred to in this advice as 'childcare providers') are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

All staff should read Part One of Keeping Children Safe in Education and staff working directly with children are asked to read annex A. Staff are asked to complete an online assessment as deemed necessary on Part One to ensure they have read and understood the guidelines. Compliance is monitored. All staff and governors have received a copy of Part One and assessment electronically.

Due to their day-to-day contact with students, College staff are uniquely placed to observe changes in children's behaviour and the outward signs of abuse. Students may also turn to a trusted adult in college when they are in distress or at risk. It is vital that staff are alert to the signs of abuse, neglect and exploitation and understand the procedures for reporting their concerns. The College will act on identified concerns and provide early help to prevent concerns from escalating.

• Roles and responsibilities at Carmel College

Key personnel:

- Designated Safeguarding Lead (DSL) and Prevent Lead
- Deputy DSL & Pastoral Director for Safeguarding
- Deputy DSL
- Safeguarding Assistant
- Principal

(current personnel responsible for these roles can be found in Appendix 8)

The college will ensure there is a member of the senior leadership team in the DSL role and that appropriate cover is provided if they are unavailable. The DSL is given the additional time, funding, training, resource and appropriate supervision support.

The DSL

- has the status and authority within the College to carry out the duties of the post, including committing resources and supporting and directing other staff.
- is appropriately trained every two years for the role, with updates annually.
- acts as a source of support and expertise to the College community.
- encourages a culture of listening to students and taking account of their wishes and feelings.
- is alert to the specific needs of children in need, those with special educational needs and young carers.
- has a working knowledge of LSCPB procedures
- understands locally agreed processes for providing early help and intervention.
- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping. This

should be flagged on, but kept separate from, the student's general file.

- refers cases of suspected abuse to children's social care or police as appropriate.
- notifies children's social care if a child with a child protection plan is absent for more than two days without explanation.
- ensures that when a student with a child protection plan leaves the College, their information is passed to their new educational establishment and the student's social worker is informed where the student is vulnerable.
- attends and/or contributes to child protection conferences and inter-agency meetings.
- coordinates the College's contribution to child protection plans.
- develops effective links with relevant statutory and voluntary agencies, including the LSCPB.
- ensures that all staff sign to indicate that they have read the Safeguarding & Child Protection Policy.
- ensures that the Safeguarding & Child Protection Policy is regularly reviewed and updated annually.
- liaises with the Principal as appropriate.
- keeps a record of staff attendance at safeguarding training.
- makes the Safeguarding & Child Protection Policy available publicly, on the College website or by other means.
- promotes supportive engagement with parents and ensures parents are aware of the College's role in safeguarding and that referrals about suspected abuse and neglect may be made.
- works with the Principal to ensure cases concerning a member of staff are referred appropriately to the Local Authority Designated Officer (LADO) and/or the Disclosure and Barring Service (DBS).
- ensures that the college knows which students currently need a social worker and understands their academic progress and attainment and maintains high aspirations for this cohort.
- The Deputy DSL(s) is appropriately trained to the same standard as the DSL and, in the absence of the designated lead, carries out those functions necessary to ensure the on- going safety and protection of students.
- The Safeguarding and Welfare Officer may be the first point of contact for safeguarding issues and will work closely with their allocated Personal Achievement Tutors (PAT) to monitor and report concerns to the DSL. Training will be provided annually.

The Governing Body ensures that the college:

- appoints a DSL for safeguarding and child protection who is a member of the senior leadership team and who has undertaken training in inter-agency working, in addition to basic child protection training
- ensures that the DSL role is explicit in the role holder's job description
- ensure they facilitate a whole college approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- has a Safeguarding & Child Protection Policy and procedures, that are consistent with LSCPB and

statutory requirements, reviewed annually and made available publicly on the college's website or by other means

- has procedures for dealing with allegations of abuse made against members of staff including allegations made against the Principal and allegations against other students
- follows safer recruitment procedures that include statutory checks on staff suitability to work with young people and ensures recording of this
- develops a training strategy that ensures all staff, including the Principal, receive information about the College's safeguarding arrangements (including online safety) on induction and appropriate child protection training, which is regularly updated in line with any requirements of the LSCP. The DSL receives refresher training at two-yearly intervals.
- ensures that all temporary staff and volunteers are made aware of the college's arrangements for safeguarding
- ensures that the College contributes to inter agency working and plans
- provides a coordinated offer of early help when additional needs of children are identified
- considers how students may be taught about safeguarding, including online as part of a broad and balanced curriculum.
- The governing body nominates a member (normally the chair) to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Principal.
- It is the responsibility of the governing body to ensure that the College's safeguarding, recruitment and managing allegations procedures are in accordance with the LSCP and national guidance
- Have overall strategic responsibility for filtering and monitoring and seek assurance that the filtering and monitoring standards for the college are being met
- Ensure that appropriate arrangements are in place to keep children safe where college facilities or premises are hired or rented out to organisations or individuals and, where services or activities are provided separately by another body, seek assurance that the body has appropriate safeguarding and child protection policies and procedures in place and that individuals working with children have appropriate DBS checks
- Ensure that safeguarding requirements are included in any transfer of control agreement, i.e. lease or hire agreement, as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement.
- Establish robust health and safety and emergency evacuation procedures

The Principal:

- ensures that the Safeguarding & Child Protection Policy and procedures are implemented and followed by all staff
- allocates sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL and deputy to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures
- ensures that students are provided with opportunities throughout the curriculum to learn about

safeguarding, including keeping themselves safe online

- liaises with the Local Authority Designated Officer where an allegation is made against a member of staff and ensures that anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service.
- Ensure that staff implement appropriate filters and monitoring of online material
- Ensure that the school practises safe recruitment in checking the suitability of staff and volunteers to work with children in accordance with the guidance in Keeping Children Safe in Education
- Ensure that the school carries out all necessary checks on the suitability of people who serve as members and/or on the governing board
- Ensure that, where the school ceases to use the services of any person because that person was considered unsuitable to work with children, a prompt and detailed report is made to the DBS within one month

- **Good practice guidelines and staff code of conduct**

All College staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach. This is clarified in the Staff Code of Conduct.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person

over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the college staff and a student under 18 may be a criminal offence, even if that student is over the age of consent.

To meet and maintain our responsibilities towards students we need to agree the standards of good practice which form a code of conduct for all staff. Good practice includes:

- treating all students with respect
- setting a good example by conducting ourselves appropriately
- involving students in decisions that affect them
- encouraging positive, respectful and safe behaviour among students including challenging inappropriate or discriminatory language or behaviour
- being a good listener
- being alert to changes in students' behaviour and to signs of abuse and neglect
- recognising that challenging behaviour may be an indicator of abuse
- avoiding favouring students over others.
- avoiding any behaviour which could lead to suspicions of anything other than a professional relationship with students
- reading and understanding the College's Safeguarding & Child Protection Policy and guidance documents on wider safeguarding issues, for example bullying, behaviour, appropriate IT use.
- asking the student's permission before initiating physical contact, such as assisting with dressing, physical support during PE or administering first aid
- maintaining appropriate standards of conversation and interaction with and between students
- avoiding the use of sexualised or derogatory language, even in joke
- being clear on professional boundaries and conduct with other staff when students are present
- being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse
- applying the use of reasonable force only as a last resort and in compliance with college and LSCPB procedures
- referring all concerns about a student's safety and welfare to the DSL, or, if necessary directly to police or children's social care
- following the College's rules with regard to communication with students and use of social media and online networking
- avoiding unnecessary time alone with students and risk managing any time alone or 1:1 working
- avoiding sharing excessive personal information with students

- Induction training includes the college's disciplinary (behaviour) policy, procedures for managing children missing education, staff code of conduct and safeguarding and child protection policy.

• **Acting in the event of a safeguarding concern**

It is the responsibility of all staff to report and record their concerns via the College safeguarding system. Any member of staff can make a referral if they have concerns that a child may be at risk. Staff should not promise confidentiality. Referrals should be made to the Safeguarding and/or Pastoral Team using the contacts identified in Appendix 8. It is not their responsibility to investigate or decide whether a child has been abused. It is very important that staff report and record their concerns – they do not need 'absolute proof' that the child is at risk.

All staff are made aware of the indicators of abuse, neglect and exploitation. Types of abuse can be found in Appendix 9. The impact of child abuse 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. 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 taking action are:

- report the concern to the Safeguarding Team as soon as possible and certainly 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 unnecessarily with colleagues or with friends or family.
- complete a timely and accurate record of the concern using CPOMS
- seek support for yourself if you are distressed.
- in an emergency take the action necessary to help the child, for example, call 999.

Appropriate support, usually a member of the pastoral team, is offered to students who have concerns about abuse, and to College staff who support them. This forms part of student induction and via notice boards in college. Students are made aware of their responsibilities with regard to Internet safety. Detail of the college's Acceptable Use Policy (for IT), is also covered during new student induction. For further guidance on how to deal with a safeguarding issue refer to the Safeguarding Procedure in Appendix 10.

Confidentiality and sharing information

The college understands that information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes.

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

Staff should only discuss concerns with the relevant member of the pastoral team, Designated Safeguarding Lead and Principal. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Keeping Children Safe in Education states that any member of staff can contact children's social care if they are concerned about a child. This should be then be shared with the DSL and DDSL's so that an overview is kept.

Child protection information will be stored and handled in line with Data Protection Act 2018 principles. All information is:

- Fairly and lawfully processed.
- Processed for limited purposes.
- Adequate, relevant and not excessive.
- Accurate.
- Not kept for longer than is necessary.
- Processed in line with your rights.
- Secure.
- Not transferred to other countries without adequate protection.

Every effort will be made to prevent unauthorised access, and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. Child protection information will be stored separately from the student's College file and the college file will be 'tagged' to indicate that separate information is held.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the Principal or DSL.

The Data Protection Act does not prevent College staff from sharing information with relevant agencies, where that information may help to protect a child. Ideally information sharing will be done in writing so that there is an evidence trail however there may be occasions in Child Protection proceedings where this method is too slow. In cases where agencies ring the college requesting information reception staff will take a message and inform the DSL immediately, the DSL will ensure they can identify who is requesting the information before sharing and then record what has been shared, when, why and with whom.

When recording, holding, using and sharing information, the DSL will ensure that they:

- Understand the importance of information sharing, both within the college and with other settings on transfer including in-year and between secondary and higher education, and with safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children's social care or the Prevent program.

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the college will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the college will do all it can to protect the anonymity of the students involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a student, staff members will not promise the student confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects students from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained

to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents/carers of the students involved. Discussions with parents will not take place where they could potentially put a student at risk of harm. Discussion with the victim's parents/carers will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents/carers will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the college will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented. Where a student is leaving the college, the DSL will consider whether it is appropriate to share any information with the student's new provider, in addition to the child protection file, that will allow the new provider to support the student and arrange appropriate support for their arrival.

• **Support for those involved in a safeguarding/ child protection issue**

Child abuse is devastating for the young person and can also result in distress and anxiety for staff who become involved.

We will support students, their families, and staff by:

- taking all suspicions and disclosures seriously
- nominating a link person (for example, the DSL) who will keep all parties informed and be the central point of contact
- where a member of staff is the subject of an allegation made by a student, separate link people will be nominated to avoid any conflict of interest
- responding sympathetically to any request from students or staff for time out to deal with distress or anxiety
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- maintaining and storing records securely
- offering details of helplines, counselling or other avenues of external support
- following the procedures laid down in our whistleblowing, complaints and disciplinary procedures
- co-operating fully with relevant statutory agencies.

The safeguarding team meet weekly to discuss safeguarding concerns and actions taken. This provides the team with an opportunity to share ideas and good practice and to spot any patterns in safeguarding issues at Carmel.

- **Complaints procedure**

Our complaints procedure will be followed where a student or parent raises a concern about poor practice towards a student that initially does not reach the threshold for child protection action.

Poor practice examples include unfairly singling out a student, belittling a student or discriminating against them in some way. Complaints are managed by senior staff, the Principal, and teacher. A copy of the College's complaints procedure is available on Connect.

- **Concerns about a colleague and allegations against staff**

Staff who are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the student is paramount. The college's whistleblowing policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. All concerns, no matter how small, must be reported and dealt with, in line with the college Low Level Concerns Policy. Carmel has a culture of vigilance.

All concerns of poor practice or possible child abuse by colleagues should be reported to the DSL and the Principal, who will contact the college's Local Area Designated Officer (LADO).

The role of the LADO [is set out in section 11 of the Children's Act 2004 and in the](#) HM Government guidance Working Together to Safeguard Children (2023) and Keeping Children Safe in Education 2025. Their role is to give advice and guidance to employers and voluntary organisations; liaise with the Police and other agencies, and monitor the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process. Every agency that works with children and young people should have a Designated Officer whose job it is to liaise with and refer to LADO.

The LADO should be alerted to all cases in which it is alleged that a person who works with children has:

- Behaved in a way that has harmed, or may have harmed, a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.

If a member of staff is faced with an allegation against an employee, volunteer or professional working or providing services to children you must contact the College's DSL at the earliest opportunity. Failure to do this could put children and young people at risk of harm. The DSL should inform the LADO within 1 working day. If the DSL is unsure if the situation meets the threshold he/she should contact the LADO for an informal discussion.

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a student to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A student may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to students and we must act on every allegation. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that students are protected.

Allegations against staff should be reported to the Principal. Allegations and complaints against the principal should be reported to the Chair of Governors. Staff may also report their concerns directly to police or children's social care if they believe direct reporting is necessary to secure action. The full procedures for dealing with allegations against staff can be found in Keeping Children Safe in Education 2025.

Staff, parents and governors are reminded that publication of material that may lead to the identification of a

teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites. We will communicate this to all parties.

Concerns may arise if an individual has behaved in a way that indicates that they may not be suitable to work with children. There is a transferable risk, for example, a member of staff may be involved in an incident outside of college which may not include children but have an impact on their suitability to work with children.

- **Staff training**

It is important that all staff have training, including online safety training, to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern. Safeguarding training for staff, including online safety training, will be integrated, aligned and considered as part of the whole-college approach to safeguarding and wider staff training and curriculum planning.

All staff and governors receive regular safeguarding awareness training. New staff and governors are expected to complete safeguarding training during the initial days of their induction period.

New staff and governors will receive the college's disciplinary process, the college's procedures for managing children who are missing education, the staff code of conduct and the Safeguarding and Child Protection Policy. The DSL and DDSL's will receive training updated at least every two years and complete advanced and specialist training that enables them to fulfil their roles and responsibilities.

Training is provided internally for staff and governors on an annual basis via an inset. In addition, staff receive regular safeguarding and child protection updates, as appropriate to their role. Training is also sourced externally via the LSCPB and other external training providers.

Staff members will be supported with their understanding of safeguarding issues and how to deal with them from their induction and throughout their time at the college. Staff members will be encouraged to participate in additional CPDL alongside mandatory safeguarding training activities.

- **Reasonable Force**

The college also considers the use of reasonable force. There are some circumstances when reasonable force may be a possibility, or it might be part of a strategy to deal with an incident of challenging behaviour. Working alongside the guidance individual plans are in place in order to minimise the likelihood of challenging behaviour without the use of force.

- **Safer recruitment**

Our college endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in Keeping Children Safe in Education 2025 together with the LSCPB and the college's individual procedures, including keeping an up to date Single Central Register. This records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the college. The Assistant Principal for Staffing and Human Resources have oversight of the single Central Record.

Safer recruitment means that all applicants will:

- provide evidence of identity and qualifications
- be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role. The appropriate DBS and suitability checks will be carried out for all governors,

volunteers, contractors and self-employed workers.

- provide evidence of their right to work in the UK
- be interviewed.
- The college will also verify the candidate's mental and physical fitness to carry out their work responsibilities.
- At least one member of each recruitment panel will have attended safer recruitment training
- Shortlisting will include a search of Social Media, carried out by the HR Manager.

All new members of staff will undergo an induction that includes familiarisation with the college's safeguarding and child protection policy and identification of their child protection training needs. All staff sign to confirm they have received a copy of the safeguarding policy.

The college obtains written confirmation from supply agencies that agency staff have been appropriately checked. The college maintains a single central record of recruitment checks undertaken.

Volunteers Risk Assessments

From the update college will be required to complete a risk assessment for each volunteer to decide if they will need to complete an enhanced DBS check. If the volunteer is not in regulated activity, then the college is not legally allowed to do a barred risk check. The college's HR department will complete the risk assessments when advised by staff that they are using a volunteer.

- **Site security**

The following procedures have been identified and essentially, three categories for visitors to site have been identified:

Visitors: Visitor/s should sign in at reception & must be accompanied at all times

Volunteers: All volunteers must undertake a DBS check and all other statutory checks prior to volunteering.

Contractors/Agency/Third party: company contact details/written confirmation that statutory checks have been carried out/copy of safeguarding policy. This should be completed in a timely manner prior to visiting the College.

There is a HR/Safeguarding risk assessment form which may be used on rare occasions if the checks above cannot be completed prior to start date/visit and only with the signed permission of the Assistant Principal (Staffing) (see appendix 4).

Visitors to the College, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site and are provided with a copy of the College's safeguarding procedures. Signage directs visitors to reception.

All visitors are expected to observe the College's safeguarding and health and safety regulations to ensure young people in College are kept safe. The Principal will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site. A color-coded lanyard indicates whether a visitor should be escorted or not. Students and staff are provided with an identity badge which details the College's safeguarding procedures.

- **Extended college and off-site arrangements**

Where extended College activities are provided by and managed by the College, our own safeguarding procedures apply. If other organisations provide services or activities on our site we will ensure that they have appropriate safeguarding and child protection procedures in place, including safer recruitment procedures. We will ensure there are arrangements in place to liaise on these matters where appropriate and inspecting these as needed. We will ensure that safeguarding requirements are included in any transfer of control agreement, as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. If college receives an allegation relating to an incident that happened when an individual or organisation was using college facilities, college policies and procedures will be followed, including informing the LADO if appropriate.

When our students attend work-related activities including work experience, all health and safety, safeguarding, insurance and data protection regulations and requirements must be observed to ensure that students are protected during their learning and in particular during work-experience placements. N.B. This also applies to any student from another college or school undertaking work-related experiences at Carmel. The College's policy regarding work related learning and work experience placements will be followed and the College Work Experience Coordinator will work with areas to ensure that all placements are safe and a full standard check list is completed before any placement.

The college's DSL is responsible for trips and there are set procedures in place including a risk assessment for staff running the trip to complete. These can be found under the Educational Trips and Visits Procedure on Connect/VLE.

Children staying with host families

The College may make arrangements for students to stay with a host family during a foreign exchange trip or sports tour. In such circumstances the college follows the guidance in Keeping Children Safe in Education, Annex E to ensure that hosting arrangements are as safe as possible.

Some overseas students may reside with host families during college terms and we will work with the local authority to check that such arrangements are safe and suitable.

If children are staying with parents from overseas as part of an exchange the host parent now needs to have an enhanced DBS check. The DBS service will process these checks without payment as these parents are volunteers. If there are other people in the family aged over 16, then the college can decide whether they will do an enhanced DBS check for those 16-17-year old's who live in the house.

Work experience

The college has detailed procedures to safeguard students undertaking work experience. Please see the Work- related Learning and Work Experience Placements Policy.

• Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

To protect students Marketing ask students to sign a consent form when their photo and name is to be used for promotional purposes.

16.e-Safety filtering and monitoring

All staff are made aware that technology is a significant component in many safeguarding and wellbeing issues. Our students increasingly use mobile phones, tablets and computers on a daily basis. They are a source of fun, entertainment, communication and education. However, we know that some adults and young people will use these technologies to harm children.

The breadth of issues can be classified into 3 areas of risk:

- **Content** - Staff will be trained to understand the risks associated with being exposed to illegal, inappropriate, or harmful material. This will include, but not be limited to, content relating to pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation, and conspiracy theories.
- **Contact** - Training will address the risks of harmful online interaction with other users. This will include peer-to-peer pressure, exposure to commercial advertising, and the threat posed by adults impersonating children or young people with the intention of grooming or exploiting them for sexual, criminal, financial, or other purposes.
- **Conduct** - Staff will be made aware of how certain online behaviours may increase the likelihood of harm or result in actual harm. This will encompass activities such as creating, sending, or receiving explicit images, the distribution of other explicit material, and instances of online bullying.
- **Commerce** - The programme will also cover risks related to online commerce. These will include dangers such as online gambling, exposure to inappropriate advertising, phishing attempts, and other types of financial scams. Any concerns that pupils or staff may be at risk will be reported promptly to the Anti-Phishing Working Group or through appropriate safeguarding channels.

The harm might range from sending hurtful or abusive communications, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings.

The College's e-safety guidance (which is part of Acceptable Use of IT Policy) explains how we aim to keep

students safe in college. Cyber-bullying and sexting by students, via texts and emails, will be treated as seriously as any other type of bullying. Usage of websites by staff and students is monitored by Sophos internet security software (firewall and filtering) and Net Support, which actively logs what students type into the internet. College filtering and monitoring procedures are reviewed at least twice per year.

Students are informed of the risks through the 10:10 programme. Parents are encouraged to consider measures to keep their children safe when using social media. E-safety guidance is available on the College intranet and is also delivered by the 10:10 Team during induction. Standards and expectations are set out in the college code of conduct, which refers to online behaviour, which reflects college's awareness of the ease of access to mobile phone networks.

Staff regularly receive practical advice towards acceptable and professional use regarding the use of social networking and electronic communication with extra focus where students and parents may be involved. Staff are made aware of our Acceptable Use of IT Policy and also have easy access to their own safety information and guidance on Connect.

The college has a filtering and monitoring service for use of IT equipment. Reports are produced and monitored on a weekly basis by the safeguarding team and any incidences of searches which flag concerns, which are followed up by the PAT team where appropriate. A number of sites are blocked to users and the college also has an acceptable use of IT policy. The guidance asks schools to have a policy about children accessing the internet while they are at school, this is discussed via the PAT sessions.

Roles and Responsibilities

Governing bodies and proprietors have overall strategic responsibility for filtering and monitoring and need assurance that the standards are being met.

- College DSL is responsible for ensuring these standards are met
- The senior leadership team are responsible for:
 - procuring filtering and monitoring systems
 - documenting decisions on what is blocked or allowed and why
 - reviewing the effectiveness of college provision
 - overseeing reports
- They are also responsible for making sure that all staff:
 - understand their role
 - are appropriately trained
 - follow policies, processes and procedures
 - act on reports and concerns

The DSL works closely together with IT service providers to meet the needs of Carmel. The DSL takes lead responsibility for safeguarding and online safety, which includes overseeing and acting on:

- filtering and monitoring reports
- safeguarding concerns
- checks to filtering and monitoring systems

The IT service provider should have technical responsibility for:

- maintaining filtering and monitoring systems
- providing filtering and monitoring reports
- completing actions following concerns or checks to systems

The IT service provider should work with the senior leadership team and DSL to:

- procure systems
- identify risk
- carry out reviews
- carry out checks

17. Students who may be particularly vulnerable

College protects all children. However, some young people may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions, and child protection procedures that fail to acknowledge young people's diverse circumstances, rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. The College also considers students on the grounds of protected characteristics. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

Early help means providing support as soon as a problem emerges, at any point in a child's life. The college will be proactive in ensuring that every student is able to access full-time education to aid their development and protect them from harm whilst utilising the unique position of having regular daily contact with students to identify concerns as early as possible.

Any child can benefit from early help, but college staff should be particularly alert to the child who:

- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- is disabled or has certain health conditions and has specific additional needs;
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in custody/prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of Honour-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education.

The college will not limit its support to students affected by the above and will be mindful of a variety of additional circumstances in which students may benefit from early help, for example, if they are:

- Bereaved.
- Viewing problematic or inappropriate online content or developing inappropriate relationships online.
- Have recently returned home to their family from care.
- Missing education, or are persistently absent from college, or not in receipt of full-time education.

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to Children's Social Care Services for assessment for statutory services if the student's situation is not improving or is worsening.

18. Child on child abuse

The topic of Child on child abuse is covered within staff training. All staff should be aware that safeguarding issues can manifest themselves via Child on child abuse. This is highlighted as part of the training delivered. This is most likely to include, but may not be limited to, bullying (including cyberbullying), gender-based violence/sexual assaults and sexting (sharing nudes and semi-nudes images or videos).

Staff should be clear as to the school or college's policy and procedures with regards to Child on child abuse which would involve reporting any incidents to the safeguarding team.

Initiation/ hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element. This may also have an online element.

Upskirting involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification to cause the victim humiliation, distress or alarm.

Child on child abuse can manifest itself in many ways. Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". The College operates a zero-tolerance approach to bullying and this is included within college induction process via tutor group sessions. Sexting is also covered within this.

Different gender issues that can be prevalent when dealing with child on child abuse. This could, for example, include girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

Child on child abuse can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

Where there is a report regarding an issue of Child on child abuse the relevant parties are interviewed by a member of the pastoral team, this is recorded on student notes and the incident is recorded on CPOMS. Parents may be contacted when necessary and depending of the nature of the alleged abuse the police may be contacted. Decisions will be made on a case by case basis. Where there has been a report of sexual violence, a risk assessment will be carried out. The college will consider whether the victim and perpetrator should share classes.

For the victims and perpetrators of Child on child abuse the PAT will be available to meet that student on a regular basis and offers an open-door policy. The college also offers a counselling service and a peer mentoring support system. The PAT will discuss strategies with the individual on how to keep safe in college and report any concerns.

Incidences of Child on child abuse aim to be minimised through 10:10 sessions where the PATs will clearly explain about the college's zero tolerance approach to bullying and what to do in the event of a bullying concern. The college also operates the SHARPS reporting system.

Serious Violence or Crime

All staff should be aware of the indicators, which may signal that a child is involved with serious crime or violence. These may include absence from college, change in friendships or relationships, a significant decline in performance, change in wellbeing, unexplained injuries and unexplained gifts.

Sexual Violence and Harassment

All Staff and governors are given training to understand the differences between sexual violence and sexual harassment.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence

It is important that schools and colleges are aware of sexual violence and the fact children can, and

sometimes do, abuse their peers in this way. When referring to sexual violence in this advice, we do so in the context of child on child sexual violence.

For the purpose of this advice, when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

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

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

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent?

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

A child under the age of 13 can never consent to any sexual activity. The age of consent is 16. Sexual intercourse without consent is rape.

Sexual Harassment

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature

Online sexual harassment.

This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- non-consensual sharing of sexual images and videos. (UKCCIS sexting advice provides detailed advice for schools and colleges);
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats.

It is important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation. Due to their additional training, the DSL (or DDSL) should be involved and leading the school or college response. If in any doubt, they should seek expert advice.

It is important that staff and governors consider sexual harassment in broad terms. Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. Carmel College has a zero-tolerance approach to sexual harassment, as is highlighted in the college Sexual Harassment Strategy.

All staff and governors should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”
- challenging behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- understanding that all of the above can be driven by wider societal factors beyond the school and college, such as everyday sexist stereotypes, everyday sexist language, misogyny/misandry. This is why a whole college approach is important.

Where an incident of sexual violence or harassment is disclosed to a member of staff, an incident is logged on CPOMS and the relevant member of staff will discuss a range of strategies to support this student as per other safeguarding procedures. This may involve seeking support from external organisations, referral to external agencies e.g. the Police and support strategies for the student while in college. If the allegations involve another student this will be investigated.

19. The child’s wishes

Where there is a safeguarding concern, the College ensures the child’s wishes and feelings are considered when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback. Ultimately, all systems and processes should operate with the best interests of the child at their heart.

20. Children with special educational needs and disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. The College ensures that its child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Awareness that behaviour, mood and injury may relate to possible abuse and not just their SEN or disability
- Higher risk of peer group isolation
- Disproportionate impact of bullying
- Difficulties with communication

The College has a dedicated Foundation Learning department for students with additional needs. Within foundation learning students are taught in small groups supported by learning assistants, have support plans and a learning mentor is available to each student.

The College also has an Additional Learning Support department working closely with students who have disclosed learning needs and provide support both inside and outside the classroom where necessary. These students are reviewed regularly by the ALS team. The college also offers a peer mentoring scheme for students who are feeling lonely within college.

College will liaise with the Local Authority where a child has an EHCP and changes have been made to their education setting or provision. In line with the equality, college will make reasonable adjustments for students.

21. Children Missing Education (CME) and children who are absent from education

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

Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

Effective information sharing between parents, schools, colleges and local authorities is critical to ensuring

that all children are safe and receiving suitable education.

A child going missing from education is a potential indicator of neglect, sexual abuse, child sexual and criminal exploitation.

Carmel College puts in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. The DSL and Pastoral Team will monitor unauthorised absence and follow procedures, particularly where students go missing on repeated occasions. Any students who enroll at the College but then do not attend at the start of term are also contacted by letter via the contact details provided. If a student has been absent for more than 5 days and have not informed college for the reason why, they will be contacted by the pastoral team and followed up by a member of the safeguarding team as appropriate.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, female genital mutilation and forced marriage. Further information about children at risk of missing education can be found in the Children Missing Education guidance. St. Helens local authority ask for information on enrolments to identify young people who are NEET.

The college endeavors to have at least 2 emergency contacts for each child in case of emergencies and in case there are welfare concerns at home. Contact numbers are collated during the admissions period.

22. Special Circumstances: Looked after children, Children with Social Workers, Children requiring mental health support

Looked after children

The most common reason for children becoming looked after is as a result of abuse or neglect. The college ensures that appropriate staff have information about a child's looked after status and care arrangements (including previously looked after children). The designated member of staff for looked after children and children with Social Workers is the DSL and the DSL will have details of the young person's social worker. They work with the Virtual School Head to improve the educational outcomes of a looked after child. In the case of care leavers, the DSL will liaise with the Personal Advisor.

Children who need a social worker

Children may need a social worker due to safeguarding or welfare needs. The DSL will use information shared by the Local Authority so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

Children requiring mental health support

Carmel is fully aware of the important role we play in supporting mental health and wellbeing of our students. For more information, please refer to the Colleges Mental Health and Wellbeing Strategy.

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

College has a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although colleges have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the college. However, it should be clear to the college who has parental responsibility. College staff should notify the designated

safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The college itself has a duty to inform the local authority of the private fostering arrangements. On admission to the college, we will take steps to verify the relationship of the adults to the child who is being registered.

23. Helping young people to keep themselves safe

E-safety, Prevent and safeguarding are topics covered in tutor sessions for students. The College also operates an online confidential reporting system to students- 'SHARP'. Students are taught to recognise when they are at risk and how to get help when they need it.

Students are taught to understand relationships and manage risk through our ongoing 10:10 Programme and in all aspects of college life. Our approach is designed to help young people to think about risks they may encounter and have help to work out how those risks might be overcome. Discussions about relationships, health and risk are empowering and enabling for all students and promote sensible behaviour rather than fear or anxiety. Students are taught how to conduct themselves and how to behave in a responsible manner. The 10:10 programme is delivered by trained staff, as well as external speakers, who are specialists in their field.

Students are also reminded regularly about and tackling bullying procedures including the legalities and consequences. The College continually promotes an ethos of respect for young people, and students are encouraged to speak to a member of staff in confidence about any worries they may have. However, all our students are aware that if they disclose that they are being harmed or that they have, or intend, to harm another that this cannot be kept secret and that information will need to be shared.

For more information on the college's online safety, see section 16.

24. Prevent Duty

Introduction

The College is committed to providing a safe and secure environment for all its staff and students. An environment where there is mutual respect, tolerance and understanding of those with different faiths and beliefs. The college recognises that in order to achieve this aim everyone must take responsibility. All members of staff, regardless of their role in college, are expected to uphold and promote the fundamental principles of:

- Democracy
- The Rule of Law
- Individual Liberty
- Mutual Respect
- Tolerance of those with different Faiths and Beliefs

Policy Statement

The College will not tolerate extremist activity of any sort which creates an environment for the radicalisation of individuals regardless of which extremist ideology it is based upon. The College aims to protect all individuals from being radicalised or exposed to extremism, by identifying who they are and providing them with support.

Radicalisation

The Institute of Strategic Dialogue defines radicalisation as "the process through which an individual changes from passiveness or activism to become more revolutionary, militant or extremist, especially where there is intent towards, or support for, violence."

Driving factors behind radicalisation can include:

- Lack of integration and/or polarisation
- Identity crises and/or isolation

- Political and/or democratic disenfranchisement
- Discrimination
- Foreign policy and/or international crises or disputes
- Political movements
- Ideologies and/or faiths

Extremism

Extremism is defined as “the holding of extreme political or religious views”. Young people in the UK are potentially vulnerable to engagement with extremist ideologies or to targeting by extremist organisations. The college should be aware of the risks and familiar with the support networks and processes in place to protect vulnerable individuals from becoming radicalised.

CONTEST is the government’s counter terrorism strategy with the aim of stopping people becoming terrorists or supporting terrorism.

The Prevent strategy (part of Contest):

- responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.
- provides practical help to prevent people from being drawn into terrorism and ensures they are given appropriate advice and support.
- works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.
- The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

It is important to remember that Islamist ideology should not be confused with traditional religious practice. It is an ideology which is based on a distorted interpretation of Islam, which betrays Islam’s peaceful principles.

Indicators

There are a number of behaviours which may indicate a person is at risk of or susceptible to being radicalised. These can be found in Appendix 11. College staff should also be alert to:

- Disclosures by students of their exposure to the extremist actions, views or materials of others outside College, such as in their homes or community groups, especially where students haven’t actively sought them out.
- Graffiti symbols, writing or art work promoting extremist messages or images.
- Students accessing extremist material online, including through social media sites.
- Parental reports of changes in behaviour, friendships or actions and requests for assistance.
- Reports of issues affecting learners in other schools or colleges locally.
- Students voicing opinions drawn from extremist ideologies and narratives.
- Use of extremist or ‘hate’ terms to exclude others or incite violence.
- College Ethos and Practice
- There is no place for extremist views of any kind in the College, whether from internal sources - students, staff or governors, or external sources.
- As a College we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for learners and that if we fail to challenge extremist views we are failing to

protect our staff and students.

- Any prejudice, discrimination or extremist views, including derogatory language, displayed by students or staff will always be challenged and where appropriate, dealt with in line with the college Disciplinary Policy and Staff Code of Practice.

If there are any concerns relating to radicalisation and extremism, these should be raised with the DSL.

Risk Assessment and Action Plan

In line with guidance from the Home Office, the college has completed a detailed risk assessment and subsequent action plan for Prevent. This can be found on the Prevent section of Carmel Connect. The Prevent Lead meets with the Prevent Coordinator for the North West to discuss the Counter Terrorism Local Profile, which is then used to inform contextual safeguarding needs.

Training

All staff at Carmel College receive annual Prevent training which forms part of the annual online safeguarding assessment which staff are required to complete. Compliance and records are kept by HR.

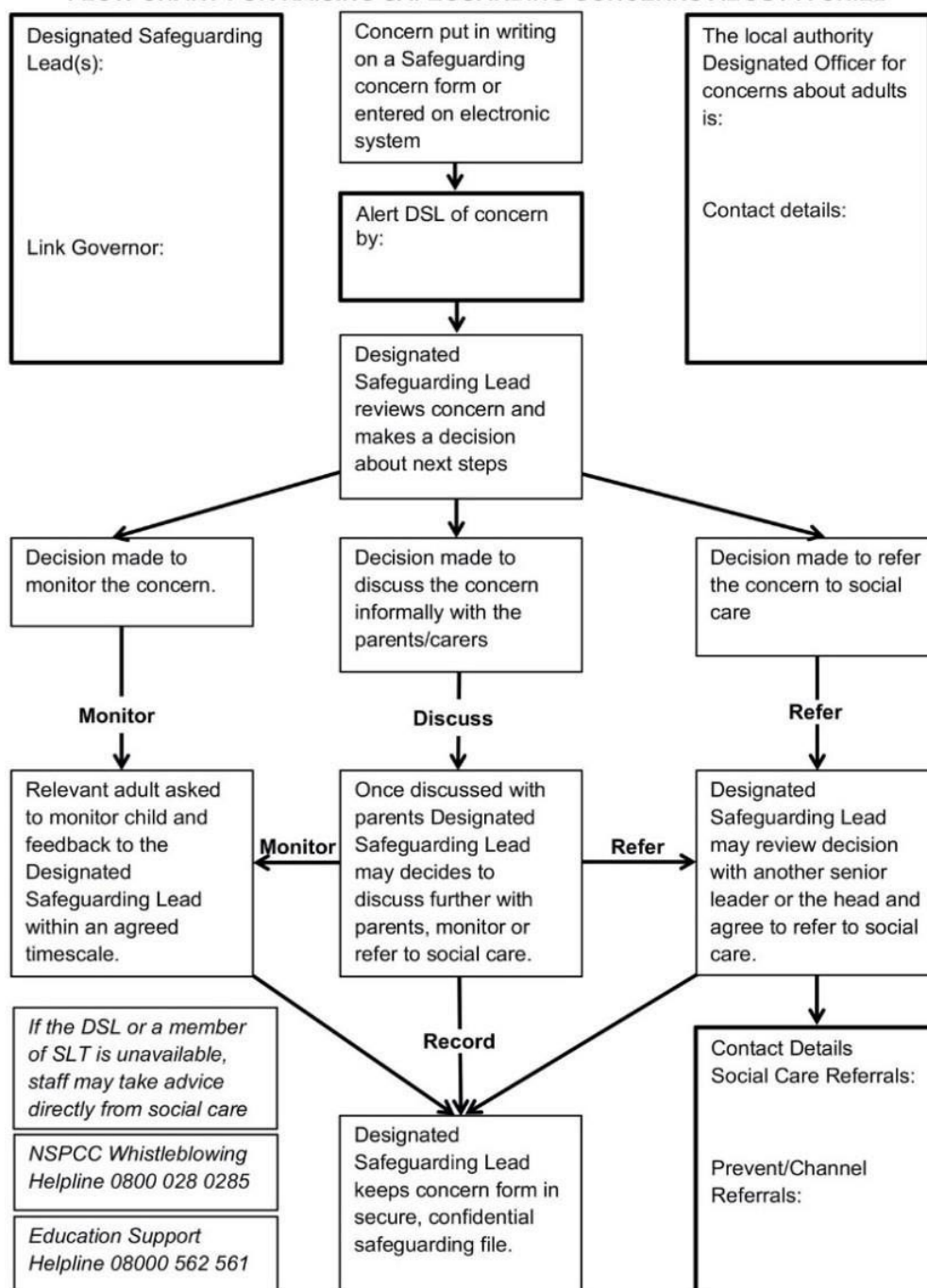
Students are provided with an overview of Prevent during 10:10 sessions as part of their Lower 6th and Upper 6th studies. There are also displays around college that highlight what prevent is and what students must do if they have concerns about someone being (or susceptible to being) radicalised.

Process

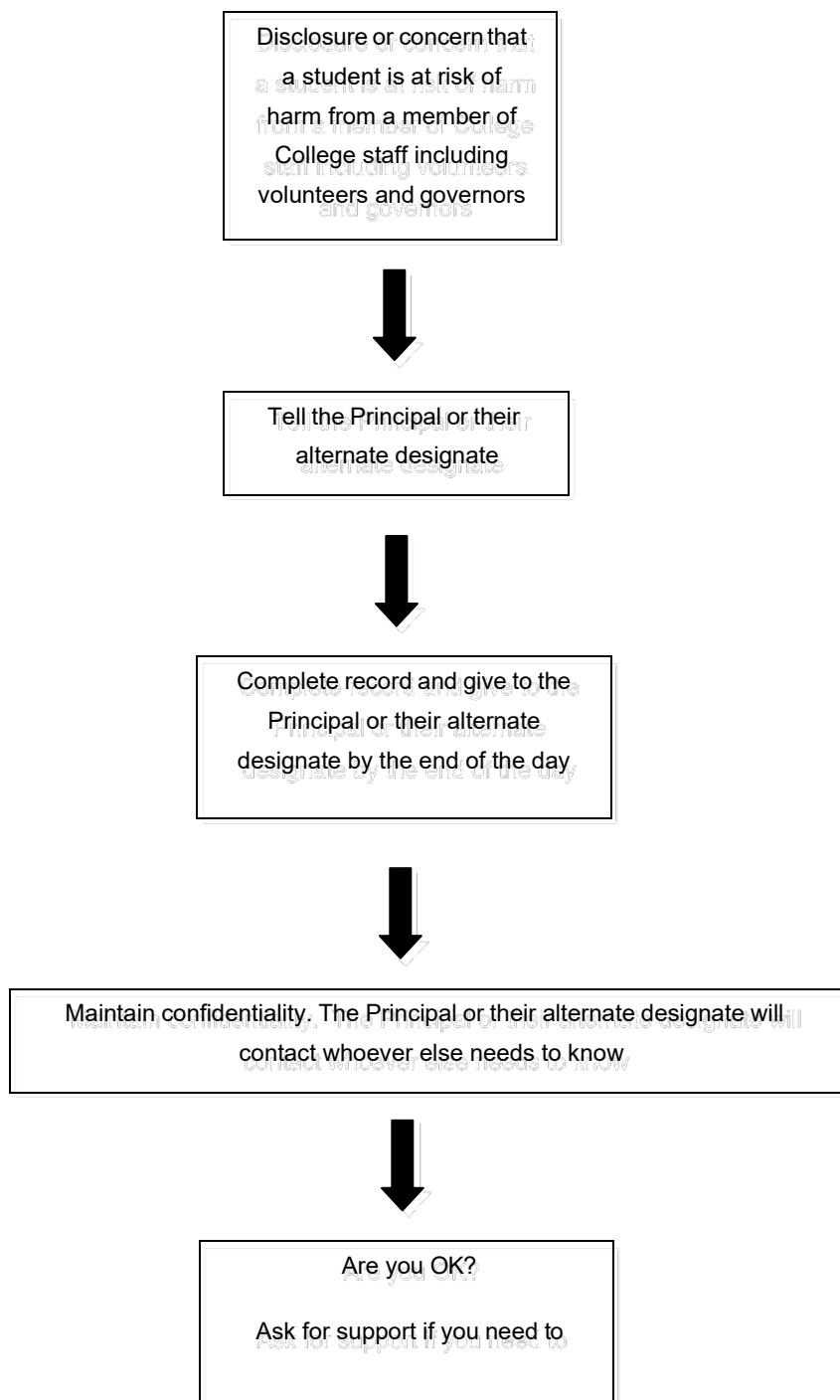
For staff and governors wishing to raise a concern relating to extremism they should contact the DSL in the first instance and complete a CPOMS referral. The Prevent lead will then contact the Prevent team at Merseyside Police, where appropriate. Details are in Appendix 5.

Appendix 1 - Flowchart for raising safeguarding concerns about a child

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD



Appendix 2 – Flowchart for disclosure or concerns regarding a member of staff



The Principal or designate may need to contact the LADO:

To make a referral to the Local Authority Designated Officer (LADO) the referrer is to complete the LADO referral form and email securely to sthelenslado@sthelens.gov.uk and then follow up with a telephone call to the Safeguarding Children Unit on **01744 671262** within **1 day of the allegation**.

Appendix 3 – Taking Action for disclosure or concerns regarding the Principal

1. Disclosure or concern that a student is at risk of harm from the Principal
2. Tell the Chair of Governors or their alternate designate
3. Complete record and give to the Chair of Governors or their alternate designate by the end of the day
4. Maintain confidentiality. The Chair of Governors or their alternate designate will contact whoever else needs to know
5. Are you OK? Ask for support if you need to



Volunteers to College

This form must be completed and signed by the Assistant Principal (Staffing) before the commencement of a volunteer placement. Line managers must obtain the approval of the Assistant Principal (Staffing) prior to the commencement of a volunteer placement.

All volunteers must complete this form/undertake a DBS check and all other statutory checks prior to volunteering.

Please print and complete all boxes. This form must be completed and returned to HR.

Personal Details				
*Full Name (including middle name)	Previous Surname(s)	Address (please provide identification)	Date of Birth	DBS status

Volunteer Details			
Contact Tel Number		Date(s) From	Date(s) to
Department Visiting			
Reason for Volunteering			
Signed (Volunteer)			

Head of Department / Line manager			
Please ensure Reception, all relevant heads of department and faculty have been informed.			
Position		Department	
Print Name			
Signed			

It is the responsibility of the Head of Department / Line manager to complete the following information and communicate this to the Assistant Principal (Staffing/HR) for approval to commence a volunteer placement.

Assistant Principal (Staffing) approval for the above individual to commence volunteer placement the College:

Signed:
Assistant Principal (Staffing)

Date:

Appendix 5 – How to report a Prevent Concern

1. Prevent concern is raised by member of staff
2. Alert DSL or alternate
3. DSL to decide whether to make a referral to Prevent
4. If a referral is made, the completed form is emailed to: prevent@merseyside.pnn.police.uk

Key personnel

Contact: Steve Sime

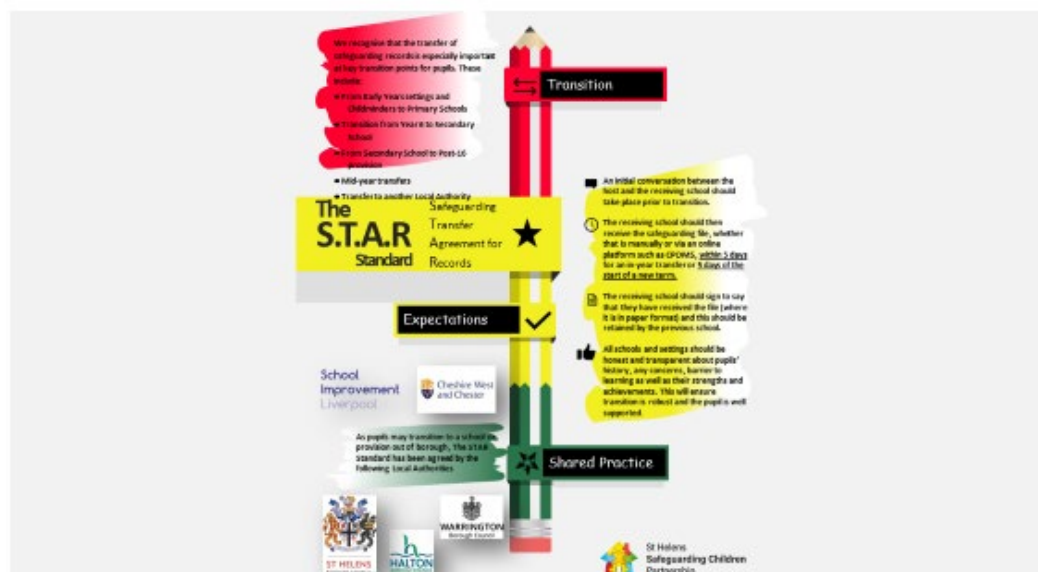
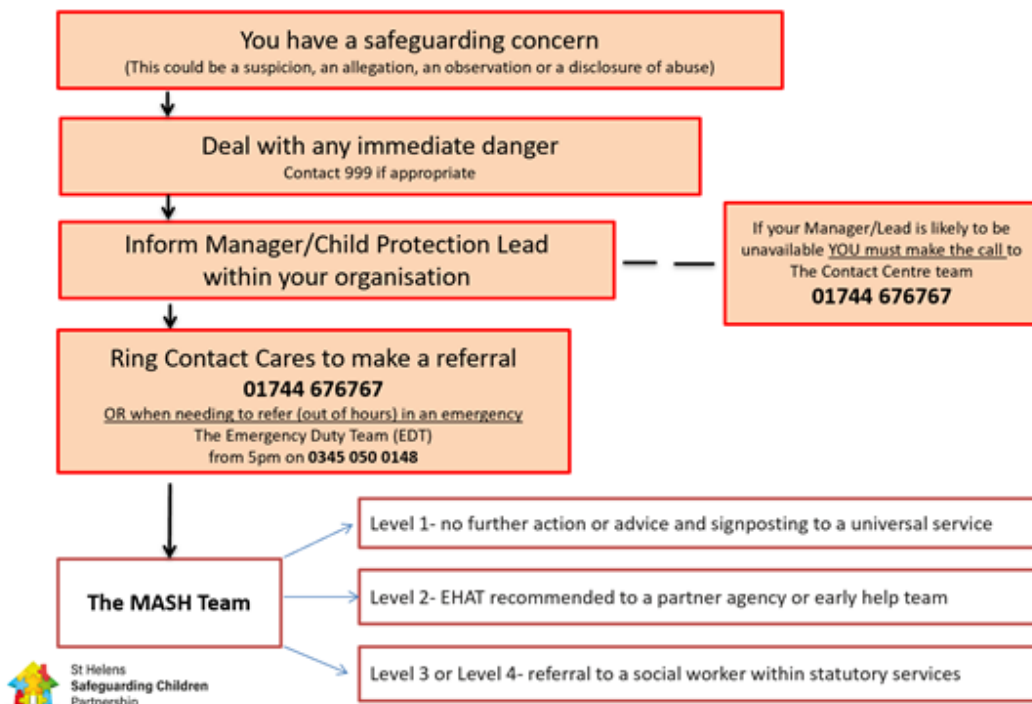
Inspector – Merseyside

Prevent@merseyside.police.uk

Counter Terrorism Policing North West (CTPNW)

Appendix 6- Flowchart for reporting a concern to the LSCPB

St. Helens process for reporting concerns about children (Under 18)



Appendix 7 - References to associated documents

Health & Safety Policy

Staff Recruitment Policy

Equality & Diversity Policy

Dealing with bullying protocol

IT and Social Media Acceptable Use Policy

Whistleblowing Policy

Educational Visits guide

Data Protection Policy

Work Experience and Placement Policy

Staff Code of Conduct

Prevent Risk Assessment

Mental Health and Wellbeing Strategy

Relationship and Sexual Education Policy

Low Level Concern Policy

Sexual Harassment Strategy

Appendix 8 - Current safeguarding personnel

Designated Safeguarding Lead: Lauren Boswell (Assistant Principal Student Development & Support)

Contact details: email: laurenb@carmel.ac.uk Tel: 01744 452200 Ext. 2256

Pastoral Director for Safeguarding and Deputy DSL: Alison Melling

Contact details: email: alisonm@carmel.ac.uk Tel 01744 452200 Ext. 2335

Deputy DSL: Clare Dawson

Contact details: email: clareg@carmel.ac.uk Tel: 01744 452200 Ext. 2279

Safeguarding Assistant: Claire Stowell

Contact details: email: claires@carmel.ac.uk Tel 01744 452200 Ext. 2258

Safeguarding Governor: Mick Martin

Contact details: email: mick@carmel.ac.uk Tel: 01744 452200

Principal: Janet Gater

Contact details: email: janetg@carmel.ac.uk Tel: 01744 452200

Appendix 9 - Indicators and types of abuse, neglect and exploitation

All staff will be aware of the indicators of abuse, neglect and exploitation and will understand that children can be at risk of harm inside and outside of the setting, inside and outside of home, and online. Staff will also be aware that students can be affected by seeing, hearing or experiencing the effects of abuse.

The college will recognise that abuse or neglect of a child may occur through the infliction of harm or through the failure to act to prevent harm. The college will understand that harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others.

The college will pay particular attention to the effects of domestic abuse on children, recognising that harm may arise not only when children are directly involved, but also when they see, hear, or otherwise experience its consequences. All necessary steps will be taken to identify and respond appropriately to such concerns in order to safeguard and promote the welfare of all students.

All staff will understand that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be given a specific definition or one label alone. Staff will understand that, in most cases, multiple issues will overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between students outside of these environments; this includes being aware that students can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a student being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

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

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children. Children are also at risk of abuse online as well as face to face.

Indicators of abuse:

Physical signs define 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 behavioural indicators of abuse and report any concerns to the DSL.

A child who is being abused or neglected 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 college or arrive late
- 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 college 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.

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.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

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.

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 tackling-bullying procedures. All students receive information regarding bullying via the 10:10 PAT Sessions and are asked to sign a Student Agreement which details how bullying is not tolerated. The subject of bullying is addressed at regular intervals in the Pastoral programme. If the bullying is particularly serious, or the tackling bullying procedures are deemed to be ineffective, the Principal and the DSL will consider implementing child protection procedures.

Child sexual exploitation:

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber-bullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse (Keeping children safe in education 2015). All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSL.

Female Genital Mutilation (FGM):

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old.

Risk factors for FGM include:

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

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

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

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. The duty does not apply in relation to at risk or suspected cases.

So-called 'honour based' abuse

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

Forced Marriage

Any form of marriage for someone under 18 is illegal, even where violence, threats or another form of coercion are not used.

County Lines

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas, using dedicated mobile phone lines. Exploitation is an integral part of county lines. Offenders will often use coercion, intimidation, violence and weapons. Children going missing may be an indicator that they have been trafficked for the purpose of CCE. The college has a zero-tolerance approach to the use of drugs and periodically uses detection dogs to identify any areas of concern within college.

Child Criminal Exploitation

Child Criminal Exploitation occurs where an individual or group takes advantage of a person under the age of 18 and may coerce, manipulate or deceive a child under that age into any activity

- In exchange for something the victim needs or wants, and/or
- For the financial advantage or increased status of the perpetrator or facilitator and/or
- Through violence or the threat of violence.

The victim may be exploited even if the activity appears consensual (i.e. moving drugs or the proceeds of

drugs from one place to another). Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. (Home Office 2018)

In the case of suspected child exploitation, the DSL will follow the PAN Merseyside Multi-Agency Child Exploitation Protocol.

Domestic Abuse

The definition of Domestic Abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Mental Health

Mental Health problems, can in some cases be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have experience adverse childhood experiences, this can have a lasting impact. The Safeguarding and Pastoral Team liaise with relevant professionals in supporting the student. The College also has a dedicated Mental Health and Wellbeing Strategy and Committee.

Appendix 10 - Procedure for dealing with a safeguarding concern

In the event of a safeguarding concern about an individual student when working within the College setting, members of the College should:

- Contact a member of the safeguarding team and discuss the concern. This will ensure that there is a coordinated approach to the needs of individual students and that all relevant information is collated.
- The Safeguarding Team (DSL, DDSL and Safeguarding and Welfare Officer) may use guidance from the Local Safeguarding Children Board or Social Services or the police (if appropriate) to decide the action to be taken and inform the person raising the concern of the decision.
- All concerns and decisions should be recorded. The person to whom the disclosure has been made will complete a referral on CPOMS and alert the DSL.
- If the person raising the concern is not satisfied that the action taken is appropriate advice should be sought from the Principal. If necessary, a referral may be made directly to Social Services. (See Appendix 6 for referral flowchart).

If a concern arises outside the College environment, but during the College day, members of the College should:

- Immediately contact the DSL/DDSL to discuss the concern
- If this person is unavailable or such discussion is impossible, advice should be sought from the Principal, or a member of SLT. If necessary, a referral can be made directly to the Local Safeguarding Children's Board.
- Actions / concerns should be recorded and a copy of the information passed to the College when notifying them.
- Outside working hours, referrals should be made directly to the Contact Centre Advisors for Adults & Children Services. All actions / concerns should be recorded and fed back to the College (see Appendix 6)

There will be occasions when staff may suspect that a student may be at risk, but have no 'real' evidence. The student's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the student the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill. It is fine for staff to ask the student if they are OK or if they can help in any way.

Staff should use CPOMS to record these early concerns. If the student does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the student, if the member of staff remains concerned, they should discuss their concerns a member of the Safeguarding Team.

If Personal Achievement Tutors receive information that leads them to suspect abuse of any student they must discuss this with the Safeguarding team. All staff are reminded that they should respect a student's right to privacy, in that information of a sensitive nature should only be passed on to staff concerned with the issue.

The DSL has the responsibility to negotiate a suitable resolution of the problem with the relevant members of the Pastoral Team and the student involved. Where appropriate this could include referring the case to Social Services or other external agencies either for advice or help. Wherever possible and where there is no risk to life, the student will be kept informed of the process and likewise, where practicable and safe,

college will inform parents/guardians of any referral before it is made or at least as soon as possible afterwards if contact cannot be made with them quickly. Written records of the case will be securely stored by the DSL.

Any information disclosed to the Counsellor will only be passed on in accordance with either the agreement of the student or without the agreement of the student in a case where the Counsellor deems there is a serious risk to life. The Counsellor will pass the relevant information on to the DSL, who will again take responsibility for co-ordination of a case conference and where appropriate liaison with external agencies.

If a student discloses to you:

- It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault.
- If a student talks to a member of staff about any risks to their safety or wellbeing, the staff member will need to let the student know that they must pass the information on, as staff are not allowed to keep secrets. The point at which they tell the student this is a matter for professional judgement. If they jump in immediately the student may think that they do not want to listen, if left until the very end of the conversation, the student may feel that they have been misled into revealing more than they would have otherwise.

During their conversations with the students it is best practice for staff to:

- allow students to speak freely
- remain calm and not overreact – the student may stop talking if they feel they are upsetting their listener
- give reassuring nods or words of comfort – ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’
- Do not be afraid of silences, and allow space and time for student to continue, staff will recognise the barriers the student may have had to overcome to disclose.
- clarifying or repeating back to check what they have heard if needed but will not lead the discussion in any way or ask investigative or leading questions – such as... whether it happens to siblings too, or what does the student’s mother think about it.
- at an appropriate time tell the student that in order to help them, the member of staff must pass the information on
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused
- avoid admonishing the child for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be the staff member’s way of being supportive but may be interpreted by the child to mean that they have done something wrong
- tell the student what will happen next. The student may agree to go with you to see the DSL. Otherwise let them know that you will be consulting them.
- write up their conversation the same day on CPOMS and alert the DSL.
- seek support if they feel distressed

- Please note that any concerns relating to the 'Prevent Strategy' can be recorded on the CPOMS.

Notifying parents

The College will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively and the DSL will contact the parent in the event of a concern, suspicion or disclosure.

However, if the College believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from the LCSPB.

Records and Monitoring

Any concerns about a child will be recorded on CPOMS ASAP and definitely within 24 hours. All records will provide a factual and evidence-based account and there will be accurate recording of any actions.

At no time should an individual teacher/member of staff or college take photographic evidence of any injuries or marks to a child's person. The body map will be used instead in accordance with recording guidance.

Why recording is important

Our staff will be encouraged to understand why it is important that recording is comprehensive and accurate and what the messages are from serious case reviews are in terms of recording and sharing information.

The DSL will have a systematic means of monitoring children known or thought to be at risk of harm (through the concern file and through an on-going dialogue with Pastoral staff). They will ensure that we contribute to assessments of need and support multi-agency plans for those children.

Referral to children's social care

The DSL will make a referral to children's social care if it is believed that a student is suffering or is at risk of suffering significant harm. The student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

Children with sexually harmful behaviour

Young people may be harmed by other students 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 student's behaviour warrants a response under child protection rather than anti-bullying procedures. In particular, research suggests that up to 40 per cent of child sexual abuse is committed by someone under the age of 18.

The management of children and young people with sexually harmful behaviour is complex and the college will work with other relevant agencies to maintain the safety of the whole college community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff who may become concerned about a student's sexual behaviour should speak to the DSL as soon as possible.

Sexual exploitation of children

As mentioned previously, sexual exploitation 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.

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

Appendix 11 - Indicators of extremism

The following list is an example of indicators of extremism which staff should be aware of:

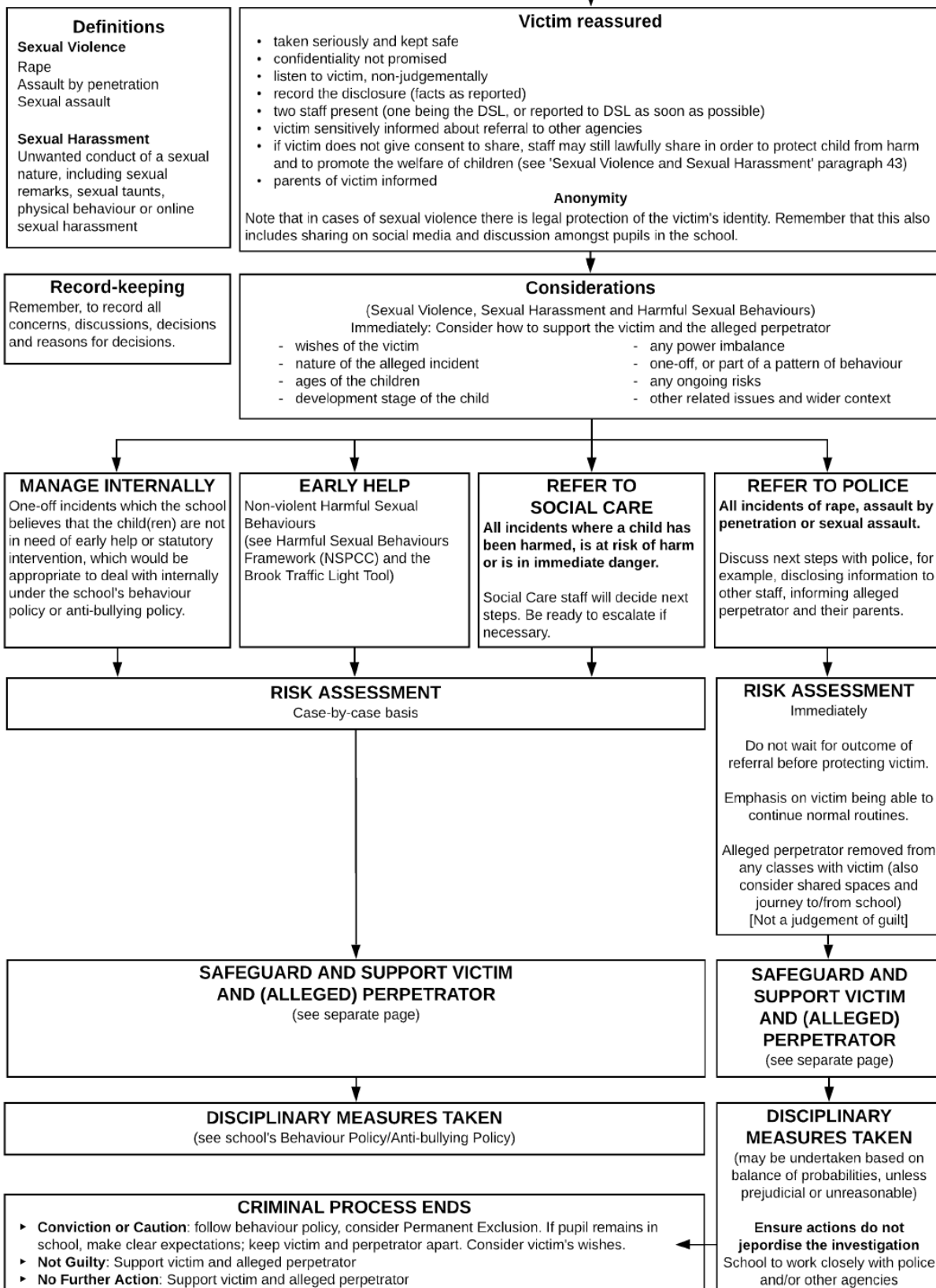
- Spending increasing time in the company of other suspected extremists.
- Changing their style of dress or personal appearance to accord with the group.
- Their day-to-day behaviour becoming increasingly centred on an extremist ideology, group or cause.
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause.
- Possession of materials or symbols associated with an extremist cause.
- Attempts to recruit others to the group or cause.
- Communication with others that suggest identification with a group, cause or ideology.
- Using insulting derogatory names for another group.
- Increase in prejudice-related incidents committed by that person- these may include physical or verbal assault, provocative behaviour, damage to property, derogatory name calling, possession of prejudice related materials, prejudice-related ridicule or name calling, inappropriate forms of address, refusal to cooperate, attempts to recruit to prejudice-related organisations, condoning or supporting violence towards others.

More specific information can be found in the DCFS document 'Learning together to be safe: A Toolkit to help schools contribute to the prevention of violent extremism.'

Appendix 12- Sexual Violence and Sexual Harassment between students Flow Chart

PART FOUR: RESPONSE TO REPORTS

Summary of responses



Source:

Sexual Violence and Sexual Harassment between children in schools and colleges (DfE, 2018)

SVSH Flow Chart for Schools 2018 v.1.1

Safeguarding and supporting victims and alleged perpetrators

Victim	Alleged Perpetrator	Other children
• needs and wishes of victim are paramount • not made to feel they are the problem • consider proportionality of response • aim for victim to carry out normal routine • recognise that they may struggle in class and may need time out (if they wish) • be aware that they may not disclose the whole picture immediately • prepare for support over a long period and consider who is involved (internal and external) • if victim moves school, the Designated Safeguarding Lead (DSL) informs the new school of the need for continued support	• possible tension between discipline and support (these are not mutually exclusive) • consider age/ developmental stage/any SEND • proportionate response • consider unmet needs (for example, harmful sexual behaviours (HBV) in younger children may be a sign or abuse or trauma) • if (alleged) perpetrator moves school, the Designated Safeguarding Lead (DSL) informs the new school of the issues and transfers the child protection file	• witnesses may need support (especially in cases of sexual violence) • avoid allowing pupils to 'take sides' • minimise potential for bullying or victimisation in school and on school transport • be aware of any social media use and inappropriate or even illegal posts (especially in cases of criminal investigation where anonymity is legally guaranteed) • develop safeguarding culture • constantly review reporting procedures and responses • consider potential for systematic and environmental weaknesses

Appendix 13 - Neglect and Anti-Bullying Policy

Introduction

For all children, learning about relationships and making friends is a key part of their development. Conflict resolution, problem solving and maintaining friendships is all part of this journey. However, unfortunately for some children, they find themselves being the victim of bullying, whether this is face to face or online.

Bullying is a complex yet real issue. As with any displayed behaviour, it is important we understand what the child or young person is trying to communicate to us. Bullying is always unacceptable, and should never be tolerated, however by addressing underlying causes, we stand a better chance of making sustainable changes and ensuring our children have happy and healthy relationships.

Context and Rationale

This appendix has been created for schools following key learning from St Helens Safeguarding Children Partnership. Neglect is a prevalent issue across St Helens and remains a key priority area for the Partnership. Neglect can have devastating consequences on a child's life, including on their relationships. If a child has not been nurtured or had the love and care that all children deserve, they can find themselves at risk of being bullied, or displaying bullying behaviours themselves.

Victims

Neglect may increase the risk of a child becoming a victim of bullying. This could be because:

- The child looks unkempt (i.e. unclean including unclean odour, poor dental hygiene, inappropriate clothing).
- A neglected child may (but not always) come from a low-income family and therefore may not be able to keep up with social pressures of having certain clothing/items.
- The young person may not have been shown love, care or warmth. This may mean that they were not shown the appropriate way to interact with other people, making it harder for them to do so in day to day life.
- A child who is neglected may have low self-esteem or anxiety which may make them vulnerable to being bullied.
- A child who is severely neglected, may develop additional learning or physical need, as the brain has not developed properly. Children with special educational needs and disabilities can be at an increased risk of being bullied.
- A child who is tired or hungry may behave differently, as their basic needs have not been met and this will affect how they can function.

Children Who Display Bullying Behaviours

Neglect may also increase the risk of a child displaying bullying behaviours to their peers. This could be because:

- A child who is severely neglected, may develop additional learning or physical need, as the brain has not developed properly. This could include social, emotional and communication difficulties which may impact on friendships.
- A child who has experienced neglect may lack the social skills to make friends. They may also have witnessed domestic abuse which can also distort their view on what a healthy relationship looks like.
- In addition, the consequential feeling of loneliness may cause them to present themselves as a more dominant force to other children.
- A child who has been neglected can feel anxious and out of control; they may therefore exert power over others to bring back the feeling of control.
- For any child who experiences abuse, including neglect, they may find themselves in 'survival mode'. The trauma they experience may place them in a state of heightened awareness (fight or flight) that can cause them to display instinctive irrational reactions, rather than the regulated response we often guide our children to make.

Opposing Views

There may be situations where there are opposing views as to whether a child is a victim or the one displaying the bullying behaviours. In these situations, it is important to not lose sight of the potential root causes of the behaviour. All incidents should be investigated thoroughly, and an impartial, evidence-based conclusion decided. However, it may be that following the outcome of the investigation, both the victim and the child displaying the bullying behaviour will need support.

