



# Safeguarding & Child Protection Policy 2026-2027

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## Statement of intent

Carmel College is committed to safeguarding and promoting the physical, mental and emotional welfare of every student, both inside and outside of our college's premises. We implement a college-wide preventative approach to managing safeguarding concerns, ensuring that the wellbeing of students is at the forefront of all action taken and that healthy relationships are promoted. The college is also committed to a zero-tolerance policy with regards to sexual harassment and violence.

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

As a 'Catholic College for the Community', inspired by Christ's words in John 10:10, 'I have come that they may have life, and have it to the full', the College provides a high-quality education rooted in Catholic Social Teaching (CST). This policy ensures students are supported not only to achieve academically but also to develop as compassionate, responsible members of society.

This policy has been created to outline a clear framework relating to any aspects of safeguarding within the college and should be followed by:

- All members of staff.
- All members of the Governing Body

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' guidance from the Department for Education, 'Statutory Guidance and Information for Schools and Colleges' and Prevent Duty Guidance.

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.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the Governing Body, the Principal and college staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to an appropriately trained person, e.g. the DSL or Deputy DSL within their college.

- Ensuring students are taught how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any student who has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that the Principal and any new staff and volunteers within the college are only appointed once all the appropriate checks have been satisfactorily completed.

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 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 maintains an inclusive, anti-discriminatory culture as part of its safeguarding responsibilities. 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.

#### **DSLs and Deputy DSLs within the college**

| <b>Carmel College</b> | <b>Name of DSL</b> | <b>Name of Deputy DSL</b>     |
|-----------------------|--------------------|-------------------------------|
| Carmel College        | Lauren Boswell     | Alison Melling & Clare Dawson |

## Acronyms

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

| Acronym | Long form                       | Description                                                                                                                                                                                                                                                                                                                                                            |
|---------|---------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| AI      | Artificial intelligence         | Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images.                                                                                                                                                                                                           |
| CCE     | Child criminal exploitation     | A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.         |
| CSCS    | Children's social care services | The branch of the local authority that deals with children's social care.                                                                                                                                                                                                                                                                                              |
| CSE     | Child sexual exploitation       | A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence. |
| DBS     | Disclosure and barring service  | The service that performs the statutory check of criminal records for anyone working or volunteering in a college.                                                                                                                                                                                                                                                     |
| DfE     | Department for Education        | The national government body with responsibility for children's services, policy and education, including early years, colleges, higher and further education policy, apprenticeships and wider skills in England.                                                                                                                                                     |
| DPO     | Data protection officer         | The appointed person in college with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act 2018.                                                                                                                                                                                     |
| DSL     | Designated safeguarding lead    | A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the college.                                                                                                                                                                                                                                       |

|            |                                             |                                                                                                                                                                                                                                                                                                              |
|------------|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| DEPUTY DSL | Deputy designated safeguarding lead         | A member of the senior leadership team who deputises for the DSL in their absence, or if they are unavailable.                                                                                                                                                                                               |
| EEA        | European Economic Area                      | The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).                                                                                                                                   |
| EHC plan   | Education, health and care plan             | A funded intervention plan which coordinates the educational, health and care needs for students who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the student. |
| FGM        | Female genital mutilation                   | All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.                                                                              |
| UK GDPR    | The UK General Data Protection Regulation   | Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.                                                                                                                   |
| HBA        | 'Honour-based' abuse                        | So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.                                                                                                                                                                                 |
| HMCTS      | HM Courts and Tribunals Service             | HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.                                                                                           |
| IICSA      | Independent Inquiry into Child Sexual Abuse | The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.                         |
| KCSIE      | Keeping children safe in education          | Statutory guidance setting out schools' and colleges' duties to safeguard and promote the welfare of children.                                                                                                                                                                                               |
| LA         | Local authority                             | A local government agency responsible for the provision of a range of services in a specified local area, including education.                                                                                                                                                                               |

|        |                                                               |                                                                                                                                                                                                                                  |
|--------|---------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| LSCPБ  | St Helens<br>Safeguarding<br>Children<br>Partnership<br>Board | A local partnership comprising of Local Authority, Police and Health to discharge a shared and equal duty to safeguard and promote the welfare of children.                                                                      |
| CLA    | Child(ren)<br>Looked-After                                    | Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.                                                                                |
| LGBTQ+ | Lesbian, gay,<br>bisexual,<br>transgender and<br>queer plus   | Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.                                               |
| NPCC   | The National<br>Police Chiefs'<br>Council                     | The National Police Chiefs' Council is a national coordination body for law enforcement in the UK and the representative body for British police chief officers.                                                                 |
| PCLA   | Previously<br>Child(ren)<br>Looked-After                      | Children who were previously in LA care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.                                                                     |
| PSHE   | Personal, social<br>and health<br>education                   | A non-statutory subject in which students learn about themselves, other people, rights, responsibilities and relationships.                                                                                                      |
| RSHE   | Relationships,<br>sex and health<br>education                 | A compulsory subject from Year 7 for all students. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.                                                              |
| SCR    | Single central<br>record                                      | A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the college in a non-visitor capacity. |
| SENCO  | Special<br>educational<br>needs<br>coordinator                | A statutory role within all colleges maintaining oversight and coordinating the implementation of a college's special educational needs and disabilities (SEND) policy and provision of education to students with SEND.         |
| SLT    | Senior<br>leadership team                                     | Staff members who have been delegated leadership responsibilities in a college.                                                                                                                                                  |

|     |                            |                                                                                                                                                                                                       |
|-----|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| TRA | Teaching Regulation Agency | An executive agency of the DfE with responsibility for the regulation of the teaching profession.                                                                                                     |
| VSH | Virtual School Head        | Virtual School Heads oversee promoting the educational achievement of all the children looked after by the LA they work for, and all children who currently have, or previously had, a social worker. |

## Definitions

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

For the purposes of this policy, “**consent**” is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, “**sexual violence**” refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their 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 they intentionally penetrate the vagina or anus of another person (B) with a part of their 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 they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, “**sexual harassment**” refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of college. Sexual harassment is likely to violate a student’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
  - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
  - Sharing unwanted explicit content.
  - Upskirting.
  - Sexualised online bullying.
  - Unwanted sexual comments and messages, including on social media.
  - Sexual exploitation, coercion, and threats.

For the purposes of this policy, “**upskirting**” refers to the act, as identified in the Voyeurism (Offences) Act 2019, of taking a picture or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including students and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, “**making or sharing of nude or semi-nude images and/or videos**” refers to the creation, possession or sharing of nude or semi-nude images and/or videos involving anyone under the age of 18. This includes consensual and non-consensual sharing, AI-generated content where it depicts a child, and content shared online or offline.

“**Deepfakes**” and “**deep nudes**” refer to digitally manipulated or AI-generated images, audio or videos that falsely depict a person. Where these involve nude or semi-nude images of a child, they will be managed in accordance with the college’s procedures for responding to the making or sharing of nude or semi-nude images and/or videos.

For the purposes of this policy, “**abuse**” is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, “**physical abuse**” is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, **“emotional abuse”** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, ‘making fun’ of what they say or how they communicate. It may feature age- or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently 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, but it may also occur alone.

For the purposes of this policy, **“sexual abuse”** is defined as abuse that involves forcing, causing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, **“neglect”** is defined as the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in serious impairment of a child’s health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

## **1. Legal framework**

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

### **Legislation**

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Children's Wellbeing and Schools Act 2026
- Crime and Policing Act 2026

### **Statutory guidance**

- DfE 'Keeping children safe in education'
- DfE 'Working Together to Safeguard Children'
- Home Office 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE 'Disqualification under the Childcare Act 2006'
- HM Government 'Multi-agency statutory guidance on female genital mutilation'
- HM Government 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'
- DfE 'Working together to improve school attendance'
- DfE 'Information Sharing Duty Statutory Guidance for Safeguarding Organisations and their Practitioners'

### **Non-statutory guidance**

- DfE 'What to do if you're worried a child is being abused'
- DfE 'Information sharing'
- DfE 'college governance guide'

- DfE 'Child sexual exploitation'
- DfE 'Recruit teachers from overseas'
- DfE 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE 'Teachers' Standards'
- DfE 'Meeting digital and technology standards in schools and colleges'
- DfE 'Filtering and monitoring standards for schools and colleges'
- DfE 'Restrictive interventions, including the use of reasonable force, in colleges'
- Department of Health and Social Care 'Virginity testing and hymenoplasty: multi-agency guidance'

## **Policies and documents**

This policy operates in conjunction with the following college-level and college-wide policies:

- Cyber-security Policy
- Data Protection Policy
- EDI Policy
- Health & Safety Policy
- Low-level Concerns Policy
- Safe Use of AI Policy
- Records Management Policy
- Relationship, Sex & Health Education Policy
- Staff Recruitment Policy
- Special Educational Needs Policy
- Staff Code of Conduct Policy
- IT and Social Media Acceptable Device Policy
- Strategies for Success Policy
- Use of Reasonable Force and Physical Intervention Policy
- Whistleblowing Policy

## **2. Roles and responsibilities**

The Governing Body ensures that the college:

- 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
- Ensures 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
- Appoints a DSL from the senior leadership team (explicit in their job description), with appropriate status, time, training, funding and support; appoint trained Deputy DSL(s); ensure DSL cover during college hours
- 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, annually and read Part One of KCSIE. The DSL receives refresher training at two-yearly intervals.

- Follows safer recruitment procedures that include statutory checks on staff suitability to work with young people and ensures recording of this via the SCR and pre-employment checks.
- Ensures at least one person on every appointment panel is trained in safer recruitment
- Has procedures for dealing with allegations of abuse made against members of staff including allegations made against the Principal and allegations against other students
- Ensures that all temporary staff and volunteers are made aware of the college's arrangements for safeguarding
- Ensures appropriate systems for filtering and monitoring are in place and reviewed annually
- Ensures specific roles are fulfilled to support the safeguarding and child protection of students, including senior mental health lead and a designated teacher for children looked after and post-children looked after
- 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 LSCPB and national guidance.

- Has overall strategic responsibility for filtering and monitoring and seek assurance that the filtering and monitoring standards for the college are being met
- Ensures 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
- Ensures 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.
- Establishes robust health and safety and emergency evacuation procedures

The Principal has a duty to:

- Ensure that the policies and procedures adopted by the college, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Allocate 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
- Ensure that appropriate filtering and monitoring systems are implemented and that staff understand their roles and responsibilities in relation to filtering and monitoring.
- Provide staff within the college with the appropriate policies and information upon induction.
- Ensure that staff implement appropriate filters and monitoring of online material.

- Ensure 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
- Ensure that students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online
- Ensure that the college practises safe recruitment in checking the suitability of staff and volunteers to work with children in accordance with the guidance in KCSIE and the Education (Independent School Standards) (England) Regulations 2014 as amended.
- Liaise 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, where the college 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.
- Ensure that appropriate contact with students does not prevent staff members from using reasonable force and other restrictive interventions.

At the college, the DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- Coordinate the college's approach to community-based early help and targeted family help.
- Report on an agreed basis to the Governing Body via the agreed route of communication.
- Refer cases:
  - To CSCS where abuse and neglect are suspected, and support staff who make referrals CSCS.
  - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
  - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
  - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Ensure each member of staff has access to and understands the college's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Ensure their college's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Understand the importance of information sharing within the college, and with the safeguarding partners, other agencies, organisations and practitioners.
- Adhere to any other college-level duties outlined in their college's Child Protection and Safeguarding Policy and their job description.
- 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.
- The college will ensure that appropriate arrangements are in place to provide effective DSL cover during college hours. Safeguarding information will be shared securely where necessary to ensure continuity of safeguarding arrangements and timely responses to concerns.
- 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 LSCP procedures
- understands locally agreed processes for providing early help/family help and intervention.
- 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 LSCP.
- ensures that all staff sign to indicate that they have read the Safeguarding & Child Protection Policy.
- 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/are 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 Team 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.

All teachers within the college, including the Principal, have a responsibility to:

- Safeguard students' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards.'
- Report, by law, any instances of FGM to the police.
- Adhere to the guidance that a student may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.

All staff within the college have a responsibility to:

- Consider, at all times, what is in the best interests of the students in the college.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide safe environments in which students can learn.
- Read and understand at least 'Part one' of KCSIE.

- Be aware of the college's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and Deputy DSL within the college.
- Undertake safeguarding training, including online safety training, during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the college's arrangements for community-based early help and targeted family help and understand their role in identifying students who may benefit from support before statutory intervention.
- Be aware of local safeguarding partnership arrangements and understand the referral pathways to CSCS.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL within the college.
- Be aware of and understand the college's procedure to follow in the event that a student confides they are being abused, exploited or neglected.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to their college's DSL or Deputy DSL if they are unsure about how to manage safeguarding matters.
- Be aware of safeguarding issues that, including technology-facilitated abuse, can put students at risk of harm.
- Be aware of behaviours linked to issues such as drug-taking, alcohol misuse, deliberately missing education, and sharing indecent images, and other signs that students may be at risk of harm.
- Recognise racism, faith-based prejudice, and other discrimination as harm in its own right.

### **3. Multi-agency working**

The college contributes to multi-agency working as part of its statutory duty. The college is aware of, and will follow, the local safeguarding arrangements of the St Helens Safeguarding Children Partnership Board (LSCPB).

The college will be fully engaged, involved, and included in the child-centred approach towards local safeguarding arrangements. As a relevant agency, the college follows its statutory duty to cooperate with the LSCPB's published arrangements in the same way as other relevant agencies and acts in accordance with those arrangements.

The college will work collaboratively with families and partner agencies to safeguard and promote students' welfare, through community-based early help and targeted family help, and by contributing to coordinated multi-agency plans to support children and families.

Where a child may benefit from family help, the college will work with partner agencies and contribute to multi-agency assessments and plans.

The college will allow CSCS from the host LA and, where appropriate, the placing LA, access to students to enable them to undertake or consider assessments under sections 17 or 47 of the Children Act 1989.

The college will also be mindful of the importance of inter-agency working in identifying and preventing CSE, CCE and other forms of extra-familial harm.

The college will reflect the DfE's expectations to secure strong multi-agency working by:

- Collaborating with services to achieve shared goals and share information.
- Learning from evidence and sharing perspective to evaluate provision.
- Prioritising and sharing resources depending on students' needs.
- Understanding its role within the local safeguarding arrangements.
- Mutually and constructively challenging other's assumptions in a respectful manner

### **Information sharing**

The college recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet students' needs and identify any need for community-based early help or family help.

Considering the above, staff within the college will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on colleges to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the student being placed at risk of harm.

Staff members will be made aware that there may be legal or statutory requirements to share information for safeguarding purposes when requested by relevant agencies.

Staff members within the college will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of students. If college staff members are in doubt about sharing information, they will speak to their college's DSL or Deputy DSL.

Where decisions are made about sharing or withholding information, these will be based on consideration of the risks to the student and, where appropriate, the rationale for decisions will be recorded.

## **4. Support before statutory intervention**

Support before statutory intervention means providing help as soon as a problem emerges, at any point in a child's life. This may include support from universal services, community-based early help, or targeted family help, depending on the child's level of need.

Any student may benefit from support before statutory intervention; however, staff will be particularly alert to the potential need for community-based early help or family help for students who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have a mental health need.
- Are young carers.
- Are pregnant or are a parent themselves.
- Have exhibited early signs of abusive, violent or harmful behaviours.

- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Have been repeatedly removed from the classroom.
- Have experienced multiple suspensions.
- Are on a part-time timetable.
- Are at risk of being permanently excluded or are in alternative provision or a pupil referral unit.
- Are at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation.
- Are at risk of being radicalised into terrorism.
- Have family members in custody or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Are misusing drugs or alcohol.
- Are at risk of honour or faith-based abuse, such as FGM or forced marriage.
- Are privately fostered.

The college will not limit support to students affected by the above and will be mindful of a variety of additional circumstances in which students may benefit from community-based early help or family help.

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 family help or community-based early help is appropriate. This includes liaising with other agencies and arranging a multi-agency family help assessment where appropriate, following local safeguarding partnership procedures.

Staff may be required to support other agencies and professionals during a community-based early help or family help assessment and, in some circumstances, may act as the Lead Practitioner, where appropriate and in accordance with local arrangements. All cases will be reviewed regularly and consideration given to referral to CSCS where the child's circumstances do not improve or where the level of risk increases.

Staff will be made familiar with the local thresholds for community-based early help, family help, Section 17 (Children in Need) and Section 47 (Child Protection) and will follow local safeguarding partnership procedures when making referrals.

## **5. Abuse, neglect and exploitation**

All staff will be aware of the indicators of abuse, neglect, exploitation, and modern slavery and will understand that children can be at risk of harm inside and outside of college, 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.

All staff working within 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. Staff 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.

All staff working within 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 be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially the college's 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 children outside of these environments; this includes being aware that students can be at risk of harms outside their families (extra-familial harms).

These harms include, but are not limited to:

- Sexual abuse, including harassment and exploitation.
- Domestic abuse in their own intimate relationships, including physical, sexual, emotional abuse, and stalking.
- Criminal exploitation, including financial exploitation.
- Serious youth violence.
- County lines.
- Radicalisation.

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 and that risks such as abuse can take place online as well as face to face.

Staff will also understand that child-on-child abuse can occur online and can take the form of:

- Abusive, harassing, misogynistic, or misandrist messages.
- The non-consensual making or sharing of nudes or semi-nudes, particularly within group chats.
- Sharing of abusive images and pornography to those who do not wish to receive such content.

Staff will always speak to the DSL or Deputy DSLs if they are unsure about something in relation to abuse, neglect, or exploitation.

## **6. Specific safeguarding issues**

There are certain specific safeguarding issues that can put children at risk of harm – staff will be made aware of these issues.

[Appendix A](#) of this policy sets out details about specific safeguarding issues that students may experience and outlines specific actions that would be taken in relation to individual issues.

## **7. Child-on-child abuse, including sexual harassment and sexual violence**

For the purposes of this policy, “**child-on-child abuse**” is defined as abuse between children.

The college has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy's statement of intent.

All staff will be aware that child-on-child abuse can occur between students of any age and gender, both inside and outside of college, as well as online.

All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring.

All staff should recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate.

All staff will speak to their college's DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenging inappropriate behaviour between peers and will not tolerate abuse as "banter" or "part of growing up". Staff will understand that recognising behaviours early and putting in place timely, evidence-based support can be vital in preventing child-on-child abuse.

All staff will be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as 'teenage relationship abuse'.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Serious physical assault and harm, or threat of harm with a weapon – this may include an online element which facilitates, threatens, and/or encourages physical abuse.
- Sexual violence such as rape, assault by penetration and sexual assault – this may include an online element which facilitates, threatens, and/or encourages sexual violence.
- Sexual harassment such as sexual comments, remarks, jokes, and online harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual making or sharing of nudes and semi-nudes.
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their private areas to obtain sexual gratification.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse, or humiliation used as a way of initiating a person into a group – this may also include an online element.

See Appendix B for college response to allegations of sexual violence and sexual harassment.

The college is aware that some children may be particularly vulnerable to child-on-child abuse. The college recognises that children with SEND or certain medical or physical health conditions may face additional safeguarding challenges and may be more vulnerable to abuse, bullying and prejudice-based bullying. Staff will recognise that children with disabilities are three times more likely to be abused than their peers and will consider whether additional pastoral or safeguarding support is required.

The college understands that all students have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality, or disability and will ensure that all the college give special consideration to, amongst others, children who:

- Have SEND.
- Are vulnerable to being bullied.
- Are looked after or living in unsupportive home situations.

DSLs working in the college will ensure they appropriately assess all instances of child-on-child abuse, including in cases of image-based abuse, to help determine whether the alleged perpetrator(s) is under the age of 18 or is an adult posing as a child. The DSL will immediately refer the case if it is found that a so-called child-on-child abuse incident involves an adult, e.g. where an adult poses as a child online to groom a child or young person.

All staff will be clear as to the college's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Students will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Students will also be reassured that they will be taken seriously, be supported, and kept safe.

The college's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the college's Anti-bullying Policy and Suspension and Exclusion Policy, where relevant.

The college recognises that harmful behaviours exist on a continuum and will respond proportionately, considering the age, developmental stage, intent, frequency, and seriousness of the behaviour, as well as the needs of all children involved.

## **8. Online safety and technology**

The college will ensure that staff adhere to the Acceptable Use of IT, IT and Social Media, Safe use of AI and Cyber-Security policies at all times.

As part of a broad and balanced curriculum, all students within the college will be made aware of online risks and taught how to stay safe online.

Through training, all staff within the college will be made aware of:

- Student attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a student's online activity.

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.

Staff training in online safety will cover the four categories of risk as outlined in KCSIE:

- 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, extreme sexual or physical violence, misinformation, disinformation, and conspiracy theories.

- **Contact** - Training will address the risks of harmful online interaction with other users or generative AI applications that simulate this. 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 making, sending, or receiving explicit images, including those generated using AI 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.

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.

### **Communicating with parents**

As part of the usual communication with parents, the college will reinforce the importance of students being safe online and inform parents that they will find it helpful to understand what systems their child's college uses to filter and monitor internet use.

Colleges will be expected to make it clear to parents what their children are being asked to do online for college.

## **Reviewing online safety**

The college will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by students.

The college will also review the effectiveness of its filtering and monitoring systems at least annually. This review will be led by the member of the SLT responsible for filtering and monitoring, with support from the DSL and ICT support where appropriate. The review will include checks that filtering and monitoring systems are operating effectively on all internet-connected devices in relevant locations, and a written record of the review will be maintained

## **Mobile Devices**

The college's student standards includes the expectation that mobiles phone should not be seen or heard in class, unless a teacher has explicitly instructed a student to use them in order to facilitate teaching, learning, assessment or communication.

## **9. Making or sharing of nudes or semi-nudes**

The college will ensure that staff are aware to treat the consensual and non-consensual sharing of nudes and semi-nudes as a safeguarding concern, including where these images are generated by AI.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the student, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the college community, including understanding motivations, assessing risks posed to students depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that making or sharing imagery depicting nudes or semi-nudes of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that students are not unnecessarily criminalised.

Staff will also be made aware that the laws imposed on the sharing of nudes and semi-nudes applies to digitally manipulated and AI-generated imagery.

## **10. Appropriate physical contact with students**

The college will not operate a 'no contact' policy. The college will also not agree to any request from parents or staff that would prevent the use of reasonable force and other restrictive interventions where these may be necessary and lawful. A 'no contact' approach could leave staff unable to intervene appropriately to safeguard students and others.

Physical intervention and reasonable force may be used in limited circumstances and will be managed in line with the Use of Reasonable Force and Physical Intervention Policy.

The college will adopt sensible policies and practices which will allow and support staff to make appropriate physical contact with students where this is necessary, proportionate, and in the best interests of the child. There will be circumstances in which physical contact will be appropriate and will not give rise to concerns about the use of reasonable force or restrictive interventions.

Examples of circumstances where physical contact will generally be appropriate include:

- Providing first aid.
- Guiding or escorting students, e.g. supporting a student to move to a space they have chosen to access in order to self-regulate, or assisting students to move safely.
- Comforting a distressed student.
- Congratulating or praising a student, e.g. a handshake or a brief pat on the back.
- Demonstrating how to use a musical instrument.
- Demonstrating exercises or techniques during PE lessons or sports coaching.

When deciding whether physical contact will be appropriate in a particular situation, staff will use their professional judgement and will have regard to:

- This policy and any other relevant policy.
- The context and circumstances, including whether other adults are present.
- The individual student's age and level of understanding.
- Any other relevant factors, including, but not limited to:
  - Whether the student has SEND or other vulnerabilities.
  - Whether alternative strategies that do not involve physical contact could be used.

## **11. Context of safeguarding incidents**

Safeguarding incidents can occur outside of the college and can be associated with outside factors. All staff, particularly DSLs and Deputy DSL, will always consider the context of safeguarding incidents. Assessment of students' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The college will provide as much contextual information as possible when making referrals to CSCS. This policy endeavours to meet the needs of young people across the multiple boroughs the college recruits 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.

## **12. Students potentially at greater risk of harm**

The college recognises that some groups of students can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse, neglect and exploitation. The college will ensure that safeguarding concerns involving these students are responded to appropriately, taking account of their individual needs and circumstances.

### **Students who need social workers**

Students may need social workers due to abuse, neglect, exploitation or complex family circumstances. Their experiences of adversity and trauma may leave them vulnerable to further harm and educational disadvantage, including barriers to attendance, learning, behaviour and mental health.

As a matter of routine, the DSL within each college will hold and use information from their LA about whether a student has a social worker in order to make decisions in the best interests of the student's safety, welfare, and educational outcomes.

Where a student needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

## **Children who are absent from education**

The college recognises that students who are absent from education for prolonged periods and/or on repeated occasions may be at increased risk of abuse, neglect, CCE and CSE, including county lines.

The college will respond to concerns relating to attendance in accordance with its Strategies for Success Policy, and will work with CSCS and other agencies where absence gives rise to safeguarding concerns.

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.

## **Students requiring mental health support**

The college recognises that mental health problems can, in some cases, develop into safeguarding concerns. This may include self-harm, signs of an eating disorder, suicidal ideation or suicide, or indicate that a student has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Only appropriately trained professionals will make a diagnosis of a mental health condition; however, all staff will play an important role in promoting positive mental wellbeing, identifying students who may require support, ensuring there is early intervention and the referral concerns where appropriate.

Where support is required, the DSL or Deputy DSL will consider whether parents should be informed where doing so will not place the student at additional risk. Where safeguarding concerns are linked to a student's mental health or emotional wellbeing, the DSL or Deputy DSL will liaise with the college's senior mental health lead to ensure the student receives coordinated support.

A college-wide approach to promoting positive mental health and wellbeing will be maintained and the college will make use of appropriate internal and external support services where required.

### **CLA and PCLA**

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. Previously CLA (PCLA), also known as care leavers, can also remain vulnerable after leaving care.

The DSL will ensure that staff in the college have the skills, knowledge and understanding to keep CLA and PCLA safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the student.

The DSL in each college will be provided with the necessary details of students' social workers and the VSH, and, for PCLA, personal advisers.

### **Young carers**

The college recognises that caring responsibilities may have a significant impact on a student's attendance, attainment, behaviour and wellbeing.

The college will seek to identify young carers at the earliest opportunity and will work with students, families and external agencies to ensure that appropriate support is provided.

### **Students with SEND**

Children with special educational needs and/or disabilities (SEND) 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.

When managing safeguarding in relation to students with SEND, staff will be aware that:

- Certain indicators of abuse, such as behaviour, mood, and injury, may relate to the student's disability without further exploration; however, it should never be assumed that a student's indicators relate only to their disability.
- Students with SEND can be disproportionately impacted by issues such as peer isolation, bullying, and prejudice-based bullying without outwardly showing any signs.
- Communication barriers may make it more difficult for students to recognise, disclose, or report abuse.
- Students with SEND may not always recognise that what is happening to them is abuse.
- Students requiring intimate care or who are more isolated from others may be at increased risk.
- Students may be more dependent on adults for care.
- Students may have difficulty understanding the difference between fact and fiction online or understanding the consequences of their online behaviour.

When responding to safeguarding concerns involving students with SEND, the DSL will liaise with the SENCO and, where appropriate, parents and external agencies to ensure that the student receives appropriate support.

The college will also consider whether additional pastoral support or communication support is required.

### **Students with medical conditions**

The college recognises that students with medical conditions, including allergies, may face additional safeguarding risks. Some students may be more dependent on adults for their care. Some may be disproportionately affected by issues such as bullying without outwardly showing any signs. Some may find it harder to recognise or report abuse, neglect or exploitation.

An incident relating to the management of a student's medical condition will not, in itself, lead to a safeguarding referral. The college will consider a referral to local safeguarding partners where an incident raises concern that the student may be at increased risk of neglect, abuse or exploitation, by people inside or outside their family, because of their medical condition. This may include situations where:

- Relevant information about a student's medical condition has not been shared with the college, putting the student at risk.
- A student repeatedly arrives at college without essential medication or equipment, such as an adrenaline auto-injector, inhaler or insulin.
- A student's condition appears not to be managed at home, for example through missed medical appointments or unexplained deterioration in their health.
- A student is being pressured or exploited in relation to their medication, for example being made to hand over prescribed medication to others.

Staff who have concerns of this kind will report them to the Safeguarding Team in line with this policy. They will not assume that a missed dose or a gap in information is simply an oversight. The DSL will liaise with the SENCO, Care Support Worker, parents or carers where appropriate, and relevant health professionals when deciding what action is needed.

To support students with medical conditions, the college will:

- Ask for information about medical conditions and allergies at application, guidance evenings and enrolment and review it at least annually, or sooner if a student's needs change.

- Put an individual healthcare plan in place where appropriate, agreed with the student, their parents or carers, and relevant health professionals.
- Share information about a student's condition with the staff who need it, including staff leading trips, residentials and work experience, in line with the college's data protection and information sharing procedures.
- Make sure staff who support students with medical needs, including those who administer medication, are appropriately trained.
- Keep records of medication administered and of any incidents relating to a student's medical condition.
- Take reasonable steps to reduce the risk of allergic reactions on site and during college activities, and make sure staff know how to respond in an emergency.
- Make reasonable adjustments in line with the Equality Act 2010, recognising that some medical conditions may amount to a disability.

### **Intimate Care**

Staff members who provide intimate care will be suitably trained, and will be made aware of what is considered good practice.

Staff will only be required to administer intimate care if it is listed in their job description or contract of employment.

The privacy and dignity of any student who requires intimate care (as identified in their Individual Care Plan and/or EHCP) will be respected at all times.

Intimate care is a regulated activity; therefore, only members of staff who have an enhanced DBS certificate with a barred list check are permitted to undertake intimate care duties.

Individual care plans will be drawn up by key staff as appropriate to suit the circumstances of the student.

Each student's right to privacy will be respected. Careful consideration will be given to each student's situation to determine how many carers will need to be present when the student requires intimate care.

If any member of staff has concerns about physical changes to a student's presentation, such as marks or bruises, they will report the concerns to the DSL immediately.

### **Students who are lesbian, gay, or bisexual**

The fact that a student is lesbian, gay, or bisexual is not, in itself, a risk factor for harm; however, the college recognises that these students, or those perceived to be lesbian, gay, or bisexual, may be more vulnerable to discriminatory bullying.

The college will take appropriate steps to prevent and respond to bullying and ensure that all students feel safe, respected, and supported.

### **Students who are questioning their gender**

The college recognises that some students may question their gender and that they may have additional vulnerabilities, including mental health or psychosocial needs.

The college will take time to understand the individual circumstances of students who are questioning their gender and will respond on a case-by-case basis, acting in the best interests of the student and taking account of the safety and wellbeing of all students.

The college will not initiate action relating to social transition. Where a request for support is received from a student or their parent, the college will respond in accordance with the latest DfE guidance, taking a cautious approach, involving the DSL and, except where doing so would place the student at risk of significant harm, working in partnership with parents.

Where a student discloses that they are questioning their gender or requests support in relation to social transition, staff will listen carefully and respond sensitively. Staff will not promise confidentiality and will explain that any information shared may need to be discussed with the DSL in order to safeguard and promote the student's welfare.

The college will maintain a culture in which bullying is not tolerated and will ensure that students who are questioning their gender receive appropriate safeguarding support and are able to raise concerns with college members of staff.

All DDSLs within the college will ensure that appropriate records are maintained of any requests relating to social transition, the factors considered, decisions made, and the reasons for those decisions. Records will be kept securely in accordance with the Data Protection Policy.

### **13. Use of college premises for non-college activities**

Where the college hires or rents out college facilities or college premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep students safe, including seeking approval from the corporation, where required. The college will ensure that staff refer to the DfE's [guidance](#) on keeping children safe in out-of-college settings in these circumstances.

Where the college provides the activities under the direct supervision or management of college staff, the college's safeguarding and child protection arrangements will 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.

#### **Extracurricular activities and clubs**

Extra-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will work in collaboration with the college to effectively safeguard students and adhere to local and college-wide safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of students. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

## **14. Work experience**

The college will ensure that appropriate procedures are in place to ensure that providers of work experience have appropriate safeguarding policies and procedures in place.

The college will not allow someone on the barred list to engage in regulated activity with a student on a work experience placement.

Where students are undertaking work experience at the college, an enhanced DBS check will be obtained if the student is over the age of 16.

## **15. Homestay exchange visits**

### **College-arranged homestays in UK**

Where the college are arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, the college is the regulated activity provider; therefore, the college will ensure that staff are aware of the need to obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

Where criminal record information is disclosed, colleges will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, colleges will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

### **College-arranged homestays abroad**

The college will ensure that the college are aware of their responsibility to liaise with partner colleges to discuss and agree the arrangements in place for the visit. The college will be expected to consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK.

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.

Each college will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Students will be provided with emergency contact details to use where an emergency occurs, or a situation arises that makes them feel uncomfortable.

### **Privately arranged homestays**

Where a parent or student arranges their own homestay, this is a private arrangement, and the college is not the regulated activity provider.

### **Private fostering**

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. 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.

## **16. Reporting and responding to concerns about students**

### **Reporting concerns**

Staff across the college will maintain an attitude of "it could happen here" where safeguarding is concerned. Staff will always act in the best interests of a student when they are concerned about their welfare.

Staff will be aware that data protection legislation does not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. Where there is any doubt about sharing information, staff will seek advice from the DSL or Deputy DSLs. Concerns about sharing information must not prevent the timely sharing of information where this is necessary to safeguard and promote the welfare of children.

If a member of staff has any concern about a student's welfare, or a student reports a safeguarding concern about themselves or another student, the member of staff will act immediately by reporting the concern to the Safeguarding Team in line with the college's safeguarding procedures. Concerns must be recorded promptly and accurately using CPOMS, the college's electronic safeguarding recording system.

Open CPOMS (link on home page of VLE)

Log in

Add Incident

Complete form

Submit (members of the Safeguarding Team will be alerted)

If a member of staff is unsure, they can contact a member of the Safeguarding Team to discuss their 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 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.

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

- Immediately contact the Safeguarding Team 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)

Staff will not assume that a colleague or another professional will take action or share information that may be critical to keeping a student safe. Staff will recognise that early information sharing is essential to the effective identification, assessment, and provision of appropriate support.

Where the college's DSL is unavailable, staff will report the concern to a Deputy DSLs. In exceptional circumstances, where neither the DSL nor Deputy DSLs or Safeguarding Assistant are immediately available, this will not delay appropriate action being taken. Staff will seek advice from a member of the SLT and/or the relevant LA children's social care, as appropriate. Any action taken in these circumstances will be shared with the DSL or Deputy DSLs as soon as possible.

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. 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 and complete annual training via Smartlog. 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 via CPOMS 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 Safeguarding or 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 wall displays in college.

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
- Minimise distractions
- Excercise 'professional curiosity' by asking open ended questions
- Think about other indicators, not just what the student is saying
- remain calm and neutral – 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 thinks 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
- Do not tell them 'everything is going to be okay' - you can not know that
- 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

### **Determining the appropriate response**

Following a CPOMS report, the Safeguarding Team will consider the information provided, the student's level of need, any known history and the local safeguarding threshold guidance before determining the most appropriate course of action.

This may include:

- Providing or coordinating appropriate support within the college through pastoral or wellbeing processes, including considering, where it is safe and appropriate to do so, whether parents should be informed to support the student's wellbeing.
- Undertaking or contributing to an early help or family help assessment.
- Making a referral to CSCS or other statutory services where a student may be in need, is suffering, or is likely to suffer significant harm.

Where a community-based early help or family help assessment is undertaken, the DSL/DDSLs will normally coordinate the college's involvement with partner agencies. Staff will contribute to assessments, planning, and review meetings as required. The college will keep all safeguarding cases under regular review and will request additional intervention or make further referrals where a student's circumstances do not improve or where risks increase.

Staff will be expected to familiarise themselves with the DfE's guidance on information sharing to support decision-making where information needs to be shared to safeguard children.

### **Referrals and multi-agency working**

Where a student is suffering, or is likely to suffer, significant harm, or is in immediate danger, a referral will be made immediately to the relevant LA children's social care and/or the police, as appropriate. Referrals will follow the procedures of the relevant local safeguarding partnership for the college concerned. Where a criminal offence is suspected, including incidents of sexual violence, the police will be informed without delay.

The college will follow the reporting and referral process set out in KCSIE and the procedures of the relevant local safeguarding partnership.

DSLs will be familiar with the safeguarding referral arrangements that apply within their LA area and will provide advice and support to staff as required. Information will be shared with external agencies in accordance with data protection legislation, information sharing guidance and the college's confidentiality and records management procedures.

Where a college makes a referral to CSCS, the DSL will expect confirmation of the LA's decision within one working day and will follow up if this is not received.

Where CSCS decides to undertake a statutory assessment, the Safeguarding Team will work proactively with partner agencies and relevant staff to support the assessment process.

If concerns remain following a referral or the student's circumstances do not improve, the DSL will escalate concerns or seek reconsideration in accordance with local safeguarding partnership procedures.

DSLs will maintain effective working relationships with CSCS, the police, and other relevant agencies to promote students' welfare while ensuring that the actions of the college do not compromise any ongoing investigation.

The college will not wait for the outcome of a statutory assessment or criminal investigation before taking appropriate action to safeguard and support a student. Where statutory intervention is not required, appropriate support will continue to be considered through early help, family help, pastoral support or other suitable interventions.

### **Supporting students and recording concerns**

Where safeguarding concerns arise, the college will ensure that the wishes and feelings of the student are considered in decisions affecting them, in accordance with their age and understanding. Students will be given opportunities to express their views and will be listened to, taken seriously, and supported.

Discussions with parents will take place where appropriate and where doing so will not place the student or others at increased risk of harm. The college will work in partnership with parents and relevant agencies wherever this is in the student's best interests.

All safeguarding concerns, discussions, decisions, and the reasons for those decisions will be recorded promptly by members of the Safeguarding Team and maintained securely in accordance with the college's records management procedures. Records will be transferred securely when a student moves to another education setting, in line with statutory guidance.

## **17. Concerns about college safeguarding practices**

Any concerns regarding the safeguarding practices at the college will be raised with the SLT of the college, and the necessary whistleblowing procedures will be followed, as outlined in the college's Whistleblowing Policy. If a staff member feels unable to raise an issue with their college's SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

## **18. Safeguarding concerns and allegations of abuse against staff**

The college will ensure it is equipped to manage all allegations against staff, including those who are not employees of the college, and that all relevant parties are informed.

When managing allegations against staff, the college will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns."

Allegations that meet the harms threshold include instances where staff have:

- Behaved in a way that has harmed a child or may have harmed a child.
- Committed or 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.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

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.

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 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.

## **19. Information sharing and confidentiality**

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.

Understand the importance of information sharing, both within the school and with other schools on transfer including in-year between settings, and with safeguarding partners, other agencies, organisations and practitioners.

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 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.

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

- Understand the importance of information sharing, both within the college, and with other colleges on transfer including in-year and between education settings, 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 the data protection policies of the college.

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 relevant policies 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 of the affected college 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 or DDSLs of the affected college will discuss the concern with the parents of the students involved. Discussions with parents will not take place where they could potentially put a student at risk of harm. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the college will ensure the appropriate disciplinary procedures are implemented as necessary and will analyse how damage can be minimised, and future breaches be prevented.

## 20. Safer recruitment

An enhanced DBS check with barred list information will be undertaken for all staff members and volunteers engaged in regulated activity.

The college will determine whether a role constitutes regulated activity in accordance with current legislation and DfE guidance, including the DBS Workforce Guides. This will include staff, volunteers, and third-party personnel engaged in regulated activity. Where a role constitutes regulated activity, an enhanced DBS certificate with barred list information will be obtained before the individual begins work.

The DfE's [DBS Workforce Guides](#) will be consulted when determining whether a position fits the child workforce criteria.

The college will conduct the appropriate pre-employment checks for all prospective college employees, including internal candidates and candidates who have lived or worked outside the UK. This includes pre-employment online searches.

The appropriate DBS and suitability checks will be conducted for all governors, volunteers, and contractors within the college.

The chair of Governors will undertake a suitability check by the DfE and an enhanced DBS check that will be conducted regardless of checks previously performed by other organisations or how recently these took place.

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.

### Referral to the DBS

The college will refer an individual to the DBS where the legal duty to do so is met, including where they have harmed, or pose a risk of harm to, a student and have been removed from regulated activity, or would have been removed had they not resigned, retired or otherwise left their role.

## 21. Single central record (SCR)

The college will maintain a SCR detailing the checks conducted at the college.

The SCR will contain information on all staff, including agency and third-party supply staff, volunteers in regulated activity, and teacher trainees on salaried routes, who work at the college, as well as members of the proprietor body.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required

- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- Whether the employee's position involves relevant activity, i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18
- A section 128 check for those in management positions

The college will ensure that appropriate procedures are in place for ensuring that the necessary checks have been conducted by the employment business supplying any members of staff for agency and third-party supply staff, and that written confirmation has been received confirming this. This will amount to all the same checks the college would perform on any individual working in the college or who will be providing education on the college's behalf, including through online delivery, and the date that confirmation was received.

The SCR will also record:

- Checks that have been conducted for volunteers.
- Any risk assessments that have been conducted to assess whether a volunteer should be subject to an enhanced DBS check.
- Written confirmation that supply agencies have completed all relevant checks.
- Any other information that the college deem relevant to keep children safe.

The details of an individual will be removed from the SCR once they no longer work at the college.

## **22. Volunteers Risk Assessments**

Following the Crime and Policing Act 2026 and KCSIE 2026, from 1 September 2026 the supervision exemption no longer applies to volunteers. A volunteer who teaches, trains, instructs, cares for or supervises students on more than three days in any 30-day period (counting all settings together), or at any time overnight between 2am and 6am (including residential trips), is in regulated activity even if supervised by staff. The college will obtain an enhanced DBS certificate with children's barred list information for these volunteers before they start. Where necessary, a standalone barred list check may be used as an interim measure while the full certificate is processed.

Staff must inform HR before any volunteer begins. HR will first decide whether the role is regulated activity. For volunteers not in regulated activity, the college cannot lawfully request barred list information. HR will complete a written risk assessment to decide what checks, if any, are appropriate, such as an enhanced DBS without barred list information or a basic DBS check. The assessment will consider the nature of the role, what is known about the individual, and any available references. The outcome will be recorded on the SCR. A volunteer on whom no checks have been obtained will never be left unsupervised. HR will review all existing volunteers against these criteria.

## **23. 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 and barred list 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 Principal.

Visitors to the College, including contractors, are asked to sign in and are given a lanyard and ID 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 Team.

## 24. Training

The college will ensure that staff working in it undergo safeguarding and child protection training at induction, which will be updated on an annual basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Safeguarding & Child Protection Policy.
- The Low-Level Concerns Policy.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE)
- Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and Deputy DSLs.

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep CLA and PCLA safe.
- CCE, CSE, modern slavery and trafficking, including where a referral to National Referral Mechanism may be appropriate.
- Updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the college.

The Safeguarding and Pastoral Team will undergo child protection and safeguarding training and update this training at least every two years. The Safeguarding Team will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up to date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing community-based early help, family help, and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conference, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, students with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.

The risks associated with online safety, including the additional risks faced online by students with SEND.

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 will receive training updated at least every two years.

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 Professional Learning alongside mandatory safeguarding training activities.

## **25. Monitoring and review**

This policy is reviewed at least annually by the DSL, SLT and Governors. This policy will be updated as needed to ensure it is up to date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

The college will ensure that any child protection incidents at any of its colleges will be followed by a review of the safeguarding procedures within that college and a prompt report to the governing board. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the college's procedures.

If any concerns are raised by the LADO or Ofsted about safeguarding issues, the following actions will be taken:

- The DSL conducts an investigation as a priority and comply with any deadlines given
- The Chair of the Governors reports to the LADO or Ofsted on the findings of the investigation and sets out any action to be taken
- The college endeavours to comply as soon as possible with any recommendations from the LADO or Ofsted

## Appendix A – Specific safeguarding issues

This appendix sets out details about specific safeguarding issues that students may experience and outlines specific actions that would be taken in relation to individual issues.

The college recognises that many of the safeguarding issues described in this appendix may be facilitated by technology or occur wholly online. Staff will remain alert to online indicators of abuse, exploitation, and harm and respond in accordance with this policy.

Here are the issues covered:

1. [Domestic abuse](#)
2. [Homelessness](#)
3. [Children absent from education](#)
4. [Child abduction and community safety incidents](#)
5. [Child criminal exploitation \(CCE\)](#)
6. [County lines](#)
7. [Cyber-crime](#)
8. [Child sexual exploitation \(CSE\)](#)
9. [Modern slavery](#)
10. [FGM](#)
11. [Virginity testing and hymenoplasty](#)
12. [Forced marriage](#)
13. [Radicalisation](#)
14. [Students with family members in prison](#)
15. [Students required to give evidence in court](#)
16. [Mental health](#)
17. [Serious violence](#)
18. [Adult involvement in the making or sharing of nude or semi-nude images](#)

### Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, “**domestic abuse**” is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person’s child) where both are aged 16 or over and are personally connected. “**Abusive behaviour**” includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. “**Personally connected**” includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

Staff will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

## **Homelessness**

The Safeguarding Team will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because “they have to.”

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

## **Children absent from education**

A child who is absent from college can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. The college will ensure that it responds to children persistently being absent from education and will support colleges in identifying such abuse and help prevent the risk of students becoming absent from education in the future.

Staff will monitor students that are absent from the college, particularly on repeat occasions and/or prolonged periods, and report them to the Safeguarding Team following normal safeguarding procedures.

## **Child abduction and community safety incidents**

For the purposes of this policy, “**child abduction**” is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the college that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with students.

The college will provide students with practical advice and lessons to ensure they can keep themselves safe outdoors.

## **Child criminal exploitation (CCE)**

For the purposes of this policy, “**child criminal exploitation**” is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator

- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

All staff within the college will recognise that students involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. Colleges will also recognise that students of any gender are at risk of CCE.

College staff will be aware of the indicators that a student is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from college or education or not taking part.

## County lines

For the purposes of this policy, “**county lines**” refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, college staff will be aware of the specific indicators that a student may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as ‘plugging,’ where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a ‘debt bond’ to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of students with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a student may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

## **Cyber-crime**

For the purposes of this policy, “**cyber-crime**” is defined as criminal activity committed using computers and/or the internet. This includes ‘cyber-enabled’ crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and ‘cyber-dependent’ crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as ‘hacking.’
- Denial of Service attacks, known as ‘booting.’
- Making, supplying or obtaining malicious software, or ‘malware,’ e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring students to the National Crime Agency’s Cyber Choices programme.

## **Child sexual exploitation (CSE)**

For the purposes of this policy, “**child sexual exploitation**” is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

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

College staff will be able to recognise that CSE can occur over time or be a one-off occurrence, and may happen without the student’s immediate knowledge, e.g. through others sharing videos or images of them on social media. Colleges will recognise that CSE can affect any student who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes students aged 16 and above who can legally consent to sexual activity. Staff will also recognise that students may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

College staff will be aware of the key indicators that a student is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from college or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

All concerns related to CSE will be managed in line with the Child Sexual Exploitation (CSE) Policy.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then manage the matter to conclusion. The college will cooperate as needed.

## Modern slavery

For the purposes of this policy, “**modern slavery**” encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff within the college will be aware of and alert to the signs that a student may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

## FGM

For the purposes of this policy, “**FGM**” is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All college staff will be alert to the possibility of a student being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The college’s procedures relating to managing cases of FGM and protecting students will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a student under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine students, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been conducted. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All college staff will be aware of the indicators that students may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the student. It is important to note that the student may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a student may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The student coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.

- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman.'
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All college staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the student:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending prolonged periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from college, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of so-called “**honour-based’ abuse (HBA),**” which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

## **Virginity testing and hymenoplasty**

Under the Health and Care Act 2022, it is illegal to conduct, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

**Virginity testing** - Also known as hymen, ‘2-finger’ or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

**Hymenoplasty** - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands’ family to fulfil the requirement that a woman remains ‘pure’ before marriage. Those who ‘fail’ to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff

will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. The college will educate students about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where students feel safe enough to make a disclosure.

Students aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a student is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A student is known to have requested either procedure or asks for help
- Family members disclose that the student has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a prolonged period which was not a problem previously
- Concern from family members that the student is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A student has already experienced or is at risk of other forms of HBA
- A student is already known to social services in relation to other safeguarding issues
- A student discloses other concerns that could be an indication of abuse, e.g. they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A student displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or notable change in behaviour
- A student appears fearful of their family or a particular family member
- Unexplained absence from college, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in college work, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

The college will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the student, including expediting arrangements for the procedure.

## **Forced marriage**

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether or not coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will be alert to the indicators that a student is at risk of, or has undergone, forced marriage, including, but not limited to, the student:

- Being absent from college – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming college holidays.
- Being subjected to surveillance by siblings or cousins at college.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from college by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a student who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or principal and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or principal will ensure the student is spoken to privately about these concerns and further action taken as appropriate. Students will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the student's family or those with influence in the community, without the express consent of the student, as this will alert them to the concerns and may place the student in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among students.

If a student is being forced to marry, or is fearful of being forced to, the college will be especially vigilant for signs of mental health disorders and self-harm. The student will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victim's needs at an early stage and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the college will use existing national and local protocols for multi-agency liaison with police and children’s social care.

The college will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

Colleges will establish where possible whether students at risk of forced marriage have a dual nationality or two passports.

Colleges will aim to create an open environment where students feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

The college will take a whole-college approach towards educating on forced marriage in the college curriculum and environment – in particular, the college’s RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to students. Students will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated through Professional Learning about the issues surrounding forced marriage and the signs to look out for.

## **Radicalisation**

For the purposes of this policy, “**radicalisation**” refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, “**extremism**” refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, “**terrorism**” refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public and be made for the purpose of advancing a political, religious or ideological cause.

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

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.

Protecting students from the risk of radicalisation is part of the college's wider safeguarding duties. The college will actively assess the risk of students being radicalised and drawn into extremism and/or terrorism. The college will ensure that procedures are in place for staff to be alerted to changes in students' behaviour which could indicate that they may need help or protection. The college will also ensure that staff can use their professional judgement to identify students who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL (the Prevent Lead) or making a Prevent referral. The college will work together with local safeguarding arrangements as appropriate. The Prevent Lead liaises with the Prevent Coordinator for the North West to discuss the Counter Terrorism Local Profile, which is used to inform contextual safeguarding needs, and will contact the Prevent team at Merseyside Police, where appropriate.

The college will ensure that staff engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the college will assist and advise family members who raise concerns and provide information for support mechanisms.

The Safeguarding Team in the college will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect students against the risk of radicalisation. The DSL will arrange formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

## **The Prevent duty**

Under section 26 of the Counter-Terrorism and Security Act 2015, the college is subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as **"the Prevent duty"**. The Prevent duty will form part of the college's wider safeguarding obligations.

The college's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outlined in college-level Prevent Duty Policies.

**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.

## **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. The Prevent Lead liaises 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 Y12 and Y13 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.

## **Key personnel**

Contact: Steve Sime

Inspector – Merseyside

[Prevent@merseyside.police.uk](mailto:Prevent@merseyside.police.uk)

Counter Terrorism Policing North West (CTPNW)

## **Students with family members in prison**

Students with a family member in prison will be offered pastoral support, as necessary.

## **Students required to give evidence in court**

Students required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Students will be provided with the booklet '[Going to Court and being a witness](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

## **Mental health**

All staff within the college will be made aware that mental health problems can, in some cases, be an indicator that a student has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems and colleges will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify students whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. The college will ensure that staff are also aware of how students' experiences can impact on their mental health, behaviour, and education.

Staff within the college who have a mental health concern about a student that is also a safeguarding concern are encouraged by the college to act in line with this policy and speak to the Safeguarding Team.

The college will ensure staff can access a range of advice to help staff members identify students in need of additional mental health support, including working with external agencies. It will also ensure that there is a

wide variety of advice and support offered to its colleges while ensuring an ethos that is positive towards being open about mental health is adopted and implemented in each college.

## **Serious violence**

Through training, all staff will be made aware of the indicators which may signal a student is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from college.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a student's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from college.
- Having been suspended, spent time in AP or excluded from another setting.
- Having experienced child maltreatment.
- Having used drugs or alcohol in early adolescence.
- Having previously been a victim or previously perpetrated violence.

Staff members who suspect a student may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL or a member of SLT.

The college will cooperate with safeguarding partners, CSCS, the police, and other relevant agencies where appropriate.

## **Adult involvement in the making or sharing of nude or semi-nude images**

### **Sexually motivated incidents**

The college will remain aware that not all instances involving the making or sharing of nude or semi-nude images will be between children and young people, and in some cases may involve adults posing as a child for the purpose of obtaining nude and semi-nude images from persons under 18.

Staff will be aware of the signs that an adult is involved in the sharing the nude or semi-nude images. These include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing unsolicited sexual images.

- The conversation being moved from a public to a private and/or encrypted platform.
- Being coerced or pressured into doing sexual things, including producing sexual imagery.
- Being offered money or gifts.
- Being threatened or blackmailed into sharing nude or semi-nude images, and/or further sexual activity.

### **Financially motivated incidents**

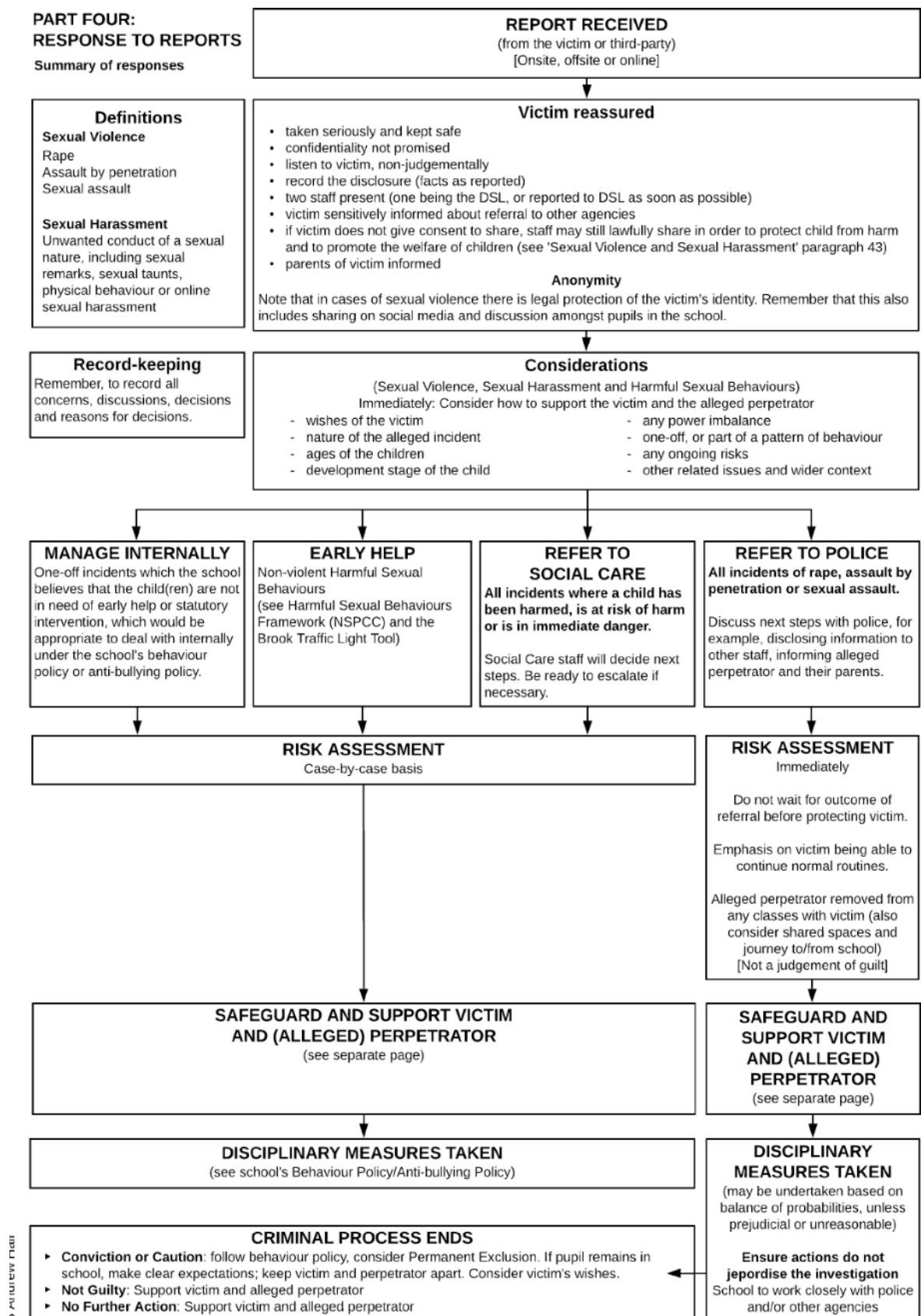
Financially motivated incidents involving the making or sharing of nude or semi-nude images involving adults may also be called “**sextortion**”, where the offender threatens to release nudes or semi-nudes of a child or young person unless they do something to prevent it, e.g. paying money. In these cases, offenders often pose as children and:

- Groom or coerce the victim into sending nudes or semi-nudes in order to blackmail them.
- Use images that have been stolen from the child or young person, e.g. via hacking.
- Use digitally manipulated and/or AI-generated images of the child or young person.

Staff will be aware of the signs of sextortion, which include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing sexual images first.
- The conversation being moved from a public to a private and/or encrypted platform.
- Told their online accounts have been hacked in order to obtain images, personal information, and contacts.
- Being blackmailed into sending money or sharing bank account details.
- Being shown stolen or digitally manipulated/generated images of the victim.

## Appendix B – Sexual Violence and Sexual Harassment Flow Chart



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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>needs and wishes of victim are paramount</li> <li>not made to feel they are the problem</li> <li>consider proportionality of response</li> <li>aim for victim to carry out normal routine</li> <li>recognise that they may struggle in class and may need time out (if they wish)</li> <li>be aware that they may not disclose the whole picture immediately</li> <li>prepare for support over a long period and consider who is involved (internal and external)</li> <li>if victim moves setting, the Designated Safeguarding Lead (DSL) informs the new school of the need for continued support</li> </ul> | <ul style="list-style-type: none"> <li>possible tension between discipline and support (these are not mutually exclusive)</li> <li>consider age/developmental stage/any SEND</li> <li>proportionate response</li> <li>consider unmet needs (for example, harmful sexual behaviours (HBV) in younger children may be a sign or abuse or trauma)</li> <li>if (alleged) perpetrator moves setting, the Designated Safeguarding Lead (DSL) informs the new setting of the issues and transfers the child protection file</li> </ul> | <ul style="list-style-type: none"> <li>witnesses may need support (especially in cases of sexual violence)</li> <li>avoid allowing students to 'take sides'</li> <li>minimise potential for bullying or victimisation in college and on college transport</li> <li>be aware of any social media use and inappropriate or even illegal posts (especially in cases of criminal investigation where anonymity is legally guaranteed)</li> <li>develop safeguarding culture</li> <li>constantly review reporting procedures and responses</li> <li>consider potential for systematic and environmental weaknesses</li> </ul> |

## **Appendix C – Current Safeguarding Personnel**

This appendix lists the current safeguarding contacts at Carmel College. It should be kept up to date and reviewed whenever personnel change.

### **Designated Safeguarding Lead (DSL)**

Lauren Boswell (Assistant Principal, Student Development & Support)

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

### **Deputy DSL – Pastoral Director for Safeguarding**

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