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| **SAFEGUARDING & CHILD PROTECTION POLICY** |
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**Date of Policy:**September 2018

**Review Date\*:**September 2019  **Coordinator (s):**Mrs P Knox **Governor:**Mr J Pulford

**Chair of Governors**: Mrs K McCormack **kmccormack@towercollege.com**

**\* Policy Review: Annually or otherwise dictated by the FGB (Full Governing Body) or by changes in legislation.**

**Updates to the previous policy which passed the ISI Regulatory Compliance Inspection in November 2017 are highlighted in green.**

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# 1. INTRODUCTION

*As well as statutory responsibilities in relation to children's learning, Schools have a pastoral and legal responsibility towards their pupils and must recognise that the children and young people in their charge have a fundamental right to be protected from harm. The welfare of the child is paramount* (Section 1 Children Act 1989).  Guidance from Keeping Children Safe in Education 2018 (KCSIE) is statutory and this document sets out the legal duties with which schools and colleges must comply and also contains information on what schools and colleges should do (unless they have good reason not to) in order to keep children safe.

*Tower College's Governing Body and the Principal will ensure that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children’s welfare.*

Tower College is committed to safeguarding and promoting the welfare and well-being of children and young people.  Schools and colleges and their staff form part of the wider safeguarding system for children.

If staff have **any concerns**about a child’s welfare, they should act on them immediately and always speak to the designated safeguarding lead or deputy. .

Safeguarding and promoting the welfare of children and young people under the age of 18 is **everyone’s responsibility**.**Everyone**who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests**of the child.

Children have a right to be safe and to be treated with dignity and respect regardless of background and free from discrimination. We recognise that children learn best when they are healthy, safe and secure. Any allegation of child abuse or a safeguarding issue will be treated with the utmost concern. We will always liaise with relevant external agencies in accordance with locally agreed protocols.

This policy is available on the School’s website and can also be obtained on request from the Principal’s office. This policy applies to Upper School, Middle School, Lower School, Pre-Prep and Early Years Foundation Stage (EYFS), and is in accordance with St. Helens Safeguarding Children Board’s Partnership locally agreed inter-agency procedures. It should be read in conjunction with other related policies named in this document, the School’s Staff Code of Conduct and Safer Recruitment Policy.

The School fully accepts its obligations under the Disclosure and Barring Scheme (DBS) legislation (Protection of Freedom Act 2012) and the Statutory Guidance issued under section 29 of the Counter-Terrorism and Security Act 2015.

This policy should be read in conjunction with the following documents. The Safeguarding Policy is completed by the policies below and all staff will sign declarations to state that they have read them.

* Safer Recruitment Policy
* Missing Pupil Policy
* Visiting Speakers Policy
* Whistleblowing Policy
* Staff Conduct Policy
* Staff Induction Policy (New Staff)
* Anti-Bullying Policy
* Behaviour Management Policy
* Pupil Mental Health & Wellbeing Policy
* Sex and Relationships Education Policy (SRE)
* Equality Policy
* E-Safety Policy
* Pupil Restraint Policy
* Supervision of Pupils Policy
* Uncollected Children Policy
* First Aid Policy
* Educational Visits
* Special Needs

# 2. PRINCIPLES

Tower College fully recognizes its responsibilities to safeguard and protect the welfare of children (Children Act 1989 & 2004) and to promote the welfare of children (Education Act; section 157, 2002). We understand that 'children' includes everyone under the age of 18. Tower College is mindful of the guidance on inter-agency working to safeguard and promote the welfare of children given in "Working Together to Safeguard Children" (2013 and 2015).  This policy has applied the guidance given in HM Government’s “Keeping Children Safe in Education” (September2018).

 Professionals sharing information

No single professional can have a full picture of a child’s needs and circumstances. If children and families are to receive the right help at the right time, **everyone**who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

At Tower College, any safeguarding information should be passed to *Mrs P Knox* as Designated Safeguarding Lead, *Miss Arnold* as Deputy Safeguarding Lead (EYFS) or*Mrs Melling* as Deputy Safeguarding Lead.  The safeguarding team is highly important to the welfare of pupils in school and safeguarding leads and deputies are most likely to have a complete safeguarding picture. In the event of all members of safeguarding staff being offsite, please contact the main office for their mobile number so you can contact them in the case of an emergency safeguarding issue or disclosure.  *Mrs O’Grady*, Principal, could also be contacted if unable to locate one of the safeguarding team.  If you feel a child is in danger of significant harm, contact the police immediately. If in exceptional circumstances, the designated safeguarding lead (or deputies) are not available, this should not delay appropriate action being taken.

All staff should be aware of the process for making referrals to children’s social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.  Staff will be informed of this via safeguarding updates, staff meetings and weekly safeguarding snippets.

## What school and college staff should do if they have concerns about a child

Wherever possible, there should be a conversation with the designated safeguarding lead (or deputy), who will help staff decide what to do next.

Options include:

* managing any support for the child internally via the school or college’s own pastoral support processes;
* an early help assessment; or
* a referral for statutory services, for example as the child is in need or suffering or likely to suffer harm

Staff will be given a copy of the recommended flowchart from KCSIE (2018).

## Early Help

**All**Tower College staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child’s life, from the foundation years through to the teenage years. In the first instance staff should discuss early help requirements with the Designated Safeguarding Lead. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children’s social care for assessment for statutory services if the child’s situation does not appear to be improving or is getting worse.

It should be noted that any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

* is disabled and has specific additional needs;
* has special educational needs (whether or not they have a statutory education, health and care plan);
* is a young carer;
* is frequently missing/goes missing from care or home;
* is misusing drugs or alcohol;
* is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse; and/or
* has returned home to their family from care.

## Child in need:

“A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989”.

## Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child’s welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

The online tool Report Child Abuse to Your Local Council directs to the relevant local children’s social care contact number.

## What will the local authority do?

Within one working day of a referral being made, a local authority social worker should acknowledge receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

* the child requires immediate protection and urgent action is required;
* the child is in need, and should be assessed under section 17 of the Children Act 1989;
* there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989;
* any services are required by the child and family and what type of services;
* further specialist assessments are required to help the local authority to decide what further action to take;
* to see the child as soon as possible if the decision is taken that the referral requires further assessment.

The referrer should follow up if this information is not forthcoming.

If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the designated safeguarding lead (or deputy) as required).

If, after a referral, the child’s situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child’s situation improves.

We are also mindful of the requirements of "Keeping Children Safe in Education" (WT) (2015 and 2016) that schools should:

***a.****Seek to ensure children grow up in circumstances consistent with the provision of safe and effective care, taking action to enable all children to have the best outcomes and working (where appropriate, with other agencies) to protect children from maltreatment and any impairment of their health or development*

***b.****Identify children suffering (or likely to suffer) significant harm and take action to safeguard, both in school and at home, those children at risk of significant harm*

***c.****Take action to promote the welfare of any children in need of additional support, even if they are not actually suffering harm or at immediate risk of it.*

***d.****If early help and or other support is appropriate the case should be kept under constant review and consideration given to a referral to children’s social care if the child’s situation doesn’t appear to be improving. The need for constant review and communication with children's social care is paramount if the child's welfare remains a concern.*

Tower College will work to be consistent with the advice and direction provided in these documents. We will also respond immediately to updates from ISI and the St Helens Safeguarding Children Board.

Tower College also understands its obligations set out in "Every Child Matters" (2003). It will work to create conditions in which its pupils can be safe, healthy, enjoy and achieve, make a positive contribution and achieve economic well-being (the five key outcomes): We recognize that safeguarding is absolute priority in the development of circumstances suitable for each child's proper progress in respect of each of these outcomes.

Standing in loco parentis' Tower College also recognizes its obligation to take the same reasonable care of a pupil (whether a child or a young adult) that an effective parent would take in similar circumstances. Furthermore, the School recognizes that, as professionals, those who work at Tower College are obliged to exercise a professional quality of care in all their dealings with young people.

Tower College's policy for Safeguarding and Child Protection accords with the requirements of the St Helens Safeguarding Children Board. It applies to all School employees, Governors, those living on site and to any volunteers working in the School. There are processes of induction and training in place, involving staff, volunteers, contractors and prefects, which aim to ensure that the policy is known and understood by those in responsibility within the School community.

# 3. INTER-AGENCY WORKING

It is imperative that Tower College works with other agencies, especially the LSCB Partnership in St. Helens (social care, the police, health services and other services), in a coordinated way.  Our safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the LSCB. This should include understanding and reflecting local protocols for assessment and the LSCB’s threshold document along with supplying information as requested by the LSCB.

We will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. All schools and colleges should allow access for children’s social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

Although inter agency working and information sharing are vital in identifying and tackling all forms of abuse, it is clear they are especially important to identify and prevent child sexual and criminal exploitation.

As part of meeting a child’s needs, it is important for governing bodies and The Principal to recognise the importance of information sharing between professionals and local agencies. Further details on information sharing can be found in Chapter one of Working together to safeguard children (PDF) and at Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (PDF).

**The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.**

Governing bodies and proprietors should ensure relevant staff have due regard to the data protection principles, which allow them to share personal information, as provided for in the Data Protection Act 2018, and the GDPR. Relevant staff should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as ‘special category personal data’.

Governing bodies and proprietors should ensure that staff who need to share ‘special category personal data’ are aware that the Data Protection Act 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

If a pupil moves on from Tower College, any safeguarding/child protection information we hold will be shared with the new place of education, separate to the pupil’s main information file.  This ensures a continuity of care to the pupil. This will be done securely by the DSL either by telephone to the next DSL, by signed for post or by secure e-mail. This sharing may also be done in advance of a child leaving if known.

# 4. IMPORTANT CONTACTS

**Principal of Tower College, Mrs A C O’Grady**

**mrsogrady@towercollege.com**

**0151 426 4333**

**Designated Safeguarding Lead, Mrs P Knox**

**mrsknox@towercollege.com**

**0151 426 4333**

**Designated Safeguarding Deputy, Mrs A Melling**

**mrsmelling@towercollege.com**

**0151 426 4333**

**Designated Safeguarding Deputy (EYFS), Miss K Arnold**

**missarnold@towercollege.com**

**0151 426 4333**

**Nominated Safeguarding Governor, Mr J Pulford**

**governors@towercollege.com**

**Chairman of Governors, Ms K McCormack**

**governors@towercollege.com**

**St Helens Safeguarding Children Partnership website: sthelenslscb.org.uk**

**St Helens Social Services First Response Team: 01744 676600**

**St Helens Out of Hours Service: 08450 500148**

**St Helens Designated Officer (DESIGNATED SAFEGUARDING OFFICER): 01744 671271**

Katherine Appleton and Margaret Gribbin

**St Helens Family Information Service: 0800 952 9523**

**HM Government – advice and support re child protection: 0808 800 5000**

**Disclosure and Barring Service: 01325 953795**PO Box 181, Darlington, DL1 9FA.

**Childline: 0800 1111**

**Merseyside Prevent: 0151 777 8311****prevent@merseysidepolice.uk**

**Anti-terrorist hotline: 0800 789321 or 999**This number to be called if the concern is that a child’s life is in imminent danger or that they are planning to travel to Syria or Iraq**.
Non-emergency:  101   educateagainsthate.com

FGM Contacts: 0800 028 3550****fgmhelp@nspcc.org.uk**

**NSPCC Contacts: 0808 800 5000****help@nspcc.or.uk** **Child Sexual Exploitation Contacts
St Helens Catch 22 Programme
Mark Woodbridge: 0151 630 1845****mark.woodbridge@catch-22.org.uk** **Helpline: 0808 168 9698**

**Child Missing from Education (CME): 01744 676789****cme@sthelens.gov.uk** **Whistleblowing
Hotline: 0300 123 3155****whistleblowing@ofsted.gov.uk** **Advice: 0207 404 6609****helpline@pcaw.co.uk**

**Sex abuse images from anywhere in the world or racial hatred content:**[**www.iwf.org.uk**](http://www.iwf.org.uk/) **Unknown person communicating with a child for sexual reasons:**[**www.ceop.police.gov.uk**](http://www.ceop.police.gov.uk/)

**Known person, non-sexual harassment or other potential crime:  Dial 101**

**Child in imminent danger:  999**

##  Contacts for other Safeguarding Boards

As a school In St Helens, we have a natural affiliation to their Safeguarding team.

However, we are aware that many of our pupils may live in areas outside St Helens.  To aid any potential referrals, we have compiled a list of other Safeguarding Boards we may have to utilise.

**(see next page)**

# 5. THE ROLE OF THE DESIGNATED SAFEGUARDING LEAD

Governing bodies and proprietors should appoint an appropriate senior **member**of staff, from the school or college **leadership team**, to the role of Designated Safeguarding Lead, including EYFS. The Designated Safeguarding Lead should take **lead responsibility**for safeguarding and child protection. It is a matter for individual schools and colleges as to whether they choose to have one or more Deputy. Any Deputies should be trained to the same standard as the Designated Safeguarding Lead.

Whilst the activities of the Designated Safeguarding Lead can be delegated to appropriately trained Deputies, the ultimate **lead responsibility**for safeguarding and child protection, as set out above, remains with the Designated Safeguarding Lead. This responsibility should not be delegated.

During term time the Designated Safeguarding Lead and or a Deputy should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. It is a matter for individual schools and the Designated Safeguarding Lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.  On the rare occasions where the DSL and Deputy are out of school together, contact numbers will be left in the school office for emergency needs.

In addition to their formal training, as set out above, their knowledge and skills should be updated, (for example via e-bulletins, meeting other Designated Safeguarding Leads, or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up with any developments relevant to their role. All additional courses should be logged and may include awareness of CSE, FGM, Mental Health, suicide and self-harm and any other relevant information.

 **The Designated Safeguarding Lead will:**

* ensure the implementation of this policy and that everyone connected with the school is aware of this policy;
* work closely with the Principal and the nominated governor and conduct an annual review;
* support other staff members in liaising with other agencies and setting up an inter-agency assessment as appropriate in the instance of early help for a child;
* update staff on the latest safeguarding recommendations at staff meetings and by school e-mail, (as required) so that staff will have relevant skills and knowledge to safeguard children effectively;
* refer cases of suspected abuse to the local authority children's social care as required and support staff who make these referrals;
* refer cases to the Channel programme where there is a radicalisation concern and support staff who make referrals to the Channel programme;
* refer cases where a person is dismissed or left due to risk/harm to a child to the DBS as required;
* refer cases where a crime may have been committed to the Police as required;
* be trained in child protection procedures and renew training every two years in order to:
1. understand the assessment process;
2. Understand the procedures of a CP case conference and child protection review conference;
3. understand the specific needs of children in need;
4. understand the specific needs of children with special educational needs and those of young carers;
5. have in place a secure and accurate record system of all concerns and referrals
* take the lead in dealing with child protection issues and in deciding next steps;
* raise awareness of the need to protect pupils who might be vulnerable to radicalization and involvement in terrorism;
* raise awareness that female genital mutilation (FGM) affects girls particularly from North African countries and it is illegal to allow girls to undergo this practice either in this country or abroad;
* arrange appropriate, compulsory training in FGM awareness for all staff:
* ensure that all concerns regarding FGM and vulnerability to radicalization are reported;
* keep a confidential Child Protection Register of all those pupils known to be at risk and only if it is confirmed by social services that the child is at risk;
* ensure all confidential child protection information is stored securely in central place;
* inform parents that information is kept on their children;
* ensure that no information will be disclosed to a parent if this would put a child at risk of significant harm;
* be trained in working with all agencies;
* familiarize school personnel with the policy and procedures;
* investigate all cases of suspected or actual problems associated with child protection;
* ensure parents are aware that referrals about suspected abuse or neglect may be made;
* make and record all child protection referrals;
* liaise and seek advice from the Local Authority Designated Officer when the need arises;
* liaise with social care and other agencies;
* record the transfer of all child protection files of any pupil leaving to join another school by keeping the following record: provide support for any child at risk;
* not promise confidentiality to any child but always act in the interests of a child;
* act as a source of advice within the school;
* help create a culture within the school of listening to children;
* are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
* can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
* keep up to date will all new guidance on safeguarding children;
* keep all school personnel up to date with any changes to procedures;
* organize appropriate training for school personnel and governors;
* ensure all incidents are recorded, reported and kept confidential;
* keep all paperwork up to date;
* keep records of staff training and re-new when needed;
* report back to the appropriate school personnel when necessary;
* ensure that there is a smooth transition of responsibilities and information when a new Designated Safeguarding Lead takes over the role;
* annually review the policy with the Principal.

## Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child’s life that are a threat to their safety and/or welfare. Children’s social care assessments should consider such factors so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

# 6. PERSONNEL TRAINING AND INDUCTION

**Designated Safeguarding Lead (DSL)**

Paula Knox, Vice-Principal, contactable on: 0151 426 4333

**Deputy Safeguarding Leads**

Katie Arnold (Early Years FS) and Alison Melling contactable on: 0151 426 4333

**Deputy designated safeguarding leads**

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility**for child protection, as set out above, remains with the designated safeguarding lead, this **lead responsibility**should not be delegated.

Tower College staff members are aware that if they have concerns about a child they should raise these with the DSL in the first instance. It is acknowledged however, that any staff member can refer their concerns to children's social care directly if there is a concern that appropriate action has not been taken.

The Designated Safeguarding Lead (DSL) and their Deputies will attend the Local Authority’s induction course and refresher training at least every two years, which includes child protection and inter-agency working as detailed in *Keeping Children Safe in Education*(2016)

 In addition, the Designated Safeguarding Lead (DSL) also meets termly with the Principal to discuss current issues/legislation and best practice.

The DSL meets termly with the Deputy Safeguarding Lead and the Governor with responsibility for Safeguarding/Child Protection to review the safeguarding policy, its procedures and the efficiency with which child protection duties have been discharged across the School.

The School’s Governor for Safeguarding / Child Protection has received named Governor training provided by St Helens Safeguarding Children’s Board.

The School ensures Child Protection training is provided for all staff, including the Principal, DSL and Deputies, temporary staff and volunteers, which is updated at least every three years, in accordance with the Local Safeguarding Children Board (LSCB) in frequency and content. This training ensures that all staff who work with children understand the School’s Safeguarding policy and procedures, and it is sufficient to equip staff to follow the School’s procedures and raise concerns appropriately. Staff already in post in April 2015 were required to read Part1 of *Keeping Children Safe in Education (March 2015)* and subsequently *(July 2015)*with this being recorded by the School’s Admin Office. All staff training will be recorded centrally in the online database. Staff will be required to read KCSIE Part 1 (September 2016), Annex A and will record their reading of these documents in the online database.

As new staff, including temporary staff and volunteers, join the School at various points in the three-yearly child protection training cycle, the School ensures that they receive the Safeguarding training and initial induction training, including their Child Protection and Safeguarding training. This is delivered by the School’s DSL, in line with advice from the LSCB, as part of the induction process. This induction, delivered by the Vice-Principal, will include:

* receiving and reading the school’s safeguarding policy, KCSIE 2018, Part 1 and school’s staff code of conduct (including staff acceptable use of technology, staff-pupil relationships and staff use of social media). Please see the separate Induction schedule;
* the identity of the relevant Designated Person(s);
* receiving and reading Part 1 of Keeping Children Safe in Education (2018) and Annex A;
* receiving and reading the School’s Whistleblowing Policy.

They then join the usual training cycle for the whole staff. A record of all Child Protection Training is kept by the DSL.

The Designated Safeguarding Lead and Deputy, through having appropriate training and experience possess the necessary status and authority to take responsibility for Child Protection matters.

Our Governing Body and Principal will take a proportional risk based approach to the level of information that is provided to temporary staff and volunteers.

Existing Staff will be trained regularly, including the DSL and Deputies. All staff members should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.  Information and updates will also be displayed on the dedicated safeguarding notice board in the staff room.

Tower Colleges Governing Body and Principal recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity should therefore be provided for all staff to contribute to and shape safeguarding arrangements and child protection policy. Staff may make comments in the Tower College staff portal when reading the policies.  We want to share good practice which may come from staff dealing with safeguarding and child protection in other settings, prior to their appointment at Tower College.

# 7. SAFER RECRUITMENT AND EMPLOYMENT PRACTICE

Tower College follows the Government's recommendations for the safer recruitment and employment of staff who work with children. All staff are subject to the statutory Child Protection checks with the Disclosure and Barring Service (DBS) before starting work.

Governing bodies and proprietors should prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children*,*taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised. The school or college should have written recruitment and selection policies and procedures in place.  In the interviewing process, we will ensure that at least one person on the panel has received safer recruitment training.

There is a new requirement under section 128 of the of the Education and Skills Act 2008 that those in management roles at independent schools, academies and free schools have an additional check to ensure they are not prohibited from teaching. This is in addition to an EDBS check.

*A section 128* direction prohibits or restricts a person from taking part in the management of an independent school, including academies and free schools. A person who is prohibited, is unable to participate in any management of an independent school such as: a management position in an independent school, academy or free school as an employee; a trustee of an academy or free school trust; a governor or member of a proprietor body for an independent school; or a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibilities. A check for a section 128 direction can be carried out using the Teacher Services’ system. Where the person will be engaging in regulated activity, a DBS barred list check will also identify any section 128 direction. A section 128 direction also prohibits a person from taking up a position as governor of a maintained school.

Teacher prohibition orders prevent a person from carrying out teaching work in schools, sixth form colleges, 16 to 19 academies, relevant youth accommodation and children's homes in England.

Teacher misconduct: the prohibition of teachers. A person who is prohibited from teaching must not be appointed to work as a teacher in such a setting. A check of any prohibition can be carried out using the Prohibition orders are described in the National College for Teaching and Leadership’s (NCTL) publication

The School makes a commitment to confirm that Child Protection checks have been carried out on any staff employed by another organisation working with the School’s pupils on another site.

All governors, volunteer helpers, contractors working regularly during term-time, and adult members of the families of members of staff who live on site, are also vetted.

When schools and colleges are considering which checks should be undertaken on volunteers, they should have regard to that guidance, together with paragraphs 161-166. However, schools and colleges may choose to carry out an enhanced DBS check, without barred list information, in certain circumstances (see paragraph 163).

We refer to Keeping Children Safe in Education (July2015) part 3. The School’s Safer Recruitment Policy and Staff Code of Conduct, which are also available on the School’s website, should be referred to when reading this Safeguarding Policy.

# 8. RAISING AWARENESS

Staff are advised to maintain an attitude of ‘it could happen here’ and when concerned about the welfare of a child, staff members should always act in the interests of the child.

All staff must be aware of the early help process. This includes identifying emerging problems, liaising with the Designated Safeguarding Lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

Staff awareness is raised through various key School policies, including but not limited to: Anti-bullying, Anti-Cyberbullying, Behaviour, ICT Acceptable Use, First Aid, and the Staff Handbook, as well as meetings, committees and through the School’s recruitment, training and induction.

 Pupils’ awareness is raised through but not limited to the following: PSHE lessons/sessions, assemblies, E-safety sessions, specific sections in the pupils’ Academic Diaries, posters from various agencies and the ICT Acceptable Use agreement.

Parents’ and Pupils’ awareness is raised through the annual distribution of e-safety advice and through the school website. These use advice available from CEOP’s Thinkuknow website ([www.thinkuknow.co.uk](http://www.thinkuknow.co.uk/)) and The UK Safer Internet Centre ([www.saferinternet.org.uk](http://www.saferinternet.org.uk/)). The Parents’ Focus Group will also be involved in the Safeguarding process.

Safeguarding children includes both the safeguarding of children who have suffered or are likely to suffer significant harm and those who are in need of additional support from one or more agencies.

Safeguarding snippets are sent on a weekly basis by e-mail and are lodged in our 'SAFEGUARDING' BASECAMP.

# 9. WHAT IS CHILD ABUSE?

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

Abuse can happen at any age and within families or other settings outside the home environment. Staff also need to be mindful of the likelihood of significant harm as shown for example by eating disorders, domestic violence, substance misuse, and self-harming.

Child abuse can take various forms, all of which can cause long term damage to a child – the main 4 categories of abuse are: **neglect, physical, emotional and sexual abuse.**

**All**staff should recognise that children are capable of abusing their peers. All staff should be clear about Tower College’s policy and procedures with regard to peer on peer abuse.

# 10. DEFINITIONS OF CHILD ABUSE

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

Abuse as a complex issueAll Tower College staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Staff should also be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

Physical AbusePhysical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing significant harm to a child. Physical harm may also be caused when a parent feigns the symptoms, or deliberately causes ill health to a child whom they are looking after (fictitious illness or Munchausen’s by proxy).

Signs may include bruises, repeated minor injuries, the mark of a hand, lacerations, bite marks, and burns, which may be apparent particularly when children change their clothes for PE, swimming and other sports activities

Harm may be caused to children by the abuse itself, and by the abuse taking place in the wider family or institutional context of conflict and aggression. Physical abuse has been linked to aggressive behaviour, emotional and behavioural problems and educational difficulties.

## Emotional Abuse

Emotional abuse is the persistent emotional ill-treatment of a child so as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to the child(ren) that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve causing children to feel frightened, in danger, depressed, or to be excessively dependent, attention seeking, or to self-harm. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may occur alone.

There is clear evidence of the adverse long-term consequences for children’s development where they have been subjected to sustained emotional abuse. Emotional abuse has an important impact on the developing child’s mental health, behaviour and self-esteem. It can be especially damaging in infancy. Underlying emotional abuse may be as important, if not more so, than other more visible forms of abuse in terms of the impact on the child. Domestic violence, adult mental health and parental substance misuse may be features in families where children are exposed to emotional harm.

## Sexual Abuse

Sexual abuse involves forcing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, or may also include non-contact activities such as involving children looking at inappropriate material, or encouraging children to behave in sexually inappropriate ways.

Disturbed behaviour including self-harm, inappropriate sexualised behaviour, substantial behavioural change, precocity, withdrawal, pregnancy, depression and loss of self- esteem have all been linked with sexual abuse; its adverse effects may endure into adulthood. The severity of the impact is likely to increase the longer the abuse continues. A number of features which may increase the severity of impact include the relationship with the abuser, the extent of premeditation, the degree of threat or coercion, and the risks posed through electronic communications and their potential for grooming.

## Neglect

Neglect is the persistent failure to meet a child’s basic and/or psychological needs, likely to result in the serious impairment of the child’s health or development. It may involve a parent or carer failing to provide adequate food, shelter and/or clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs and personal hygiene.

 Severe neglect of young children has adverse effects on children’s ability to form attachments and is associated with major impairment of growth and intellectual development, and long-term difficulties with social functioning, relationships and educational progress. Neglected children may also experience feelings of being unloved and isolated. Neglect can also result in extreme cases, in death. The impact of the neglect depends on how long the child has been neglected, the child’s age and the type of neglect.

## Child sexual exploitation (CSE)

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

Like all forms of child sex abuse, child sexual exploitation:

* can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
* can still be abuse even if the sexual activity appears consensual;
* can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
* can take place in person or via technology, or a combination of both;
* can involve force and/or enticement-based methods of compliance and may,or may not, be accompanied by violence or threats of violence;
* may occur without the child or young person’s immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
* can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
* is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Keeping Children Safe in Education (2015 Part 1, Pg 10) acknowledges the need for all schools to be particularly aware of the dangers of grooming and sexual exploitation. The NSPCC (2015) defines sexual exploitation as:

 *"Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability."*

Staff should be alert to the understanding that sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim, which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber-bullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

**In older children, signs of grooming can easily be mistaken for normal 'teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age.**

Young people who are being sexually exploited may:

* Be involved in abusive relationships, intimidated and fearful of certain people or situations;
* Hang out with groups of older people, or antisocial groups, or with other vulnerable peers;
* Associate with other young people involved in sexual exploitation;
* Get involved in gangs, gang fights, gang membership;
* Have older boyfriends or girlfriends;
* Spend time at places of concern, such as hotels or known brothels;
* Not know where they are because they have been moved around the country;
* Go missing from home, care or education.

The signs of grooming aren't always obvious. Groomers will also go to great lengths not to be identified.

Some of the following signs may be indicators of child sexual exploitation:

* children who appear with unexplained gifts or new possessions;
* children who associate with other young people involved in exploitation;
* children who have older boyfriends or girlfriends;
* children who suffer from sexually transmitted infections or become pregnant;
* children who suffer from changes in emotional well-being;
* children who misuse drugs and alcohol;
* children who go missing for periods of time or regularly come home late; and
* children who regularly miss school or education or do not take part in education;
* children who are very secretive, including about what they are doing online;
* children who go to unusual places to meet friends.

They may also show signs of sexual abuse or grooming, including online. When sexual exploitation happens online, young people may be persuaded, or forced, to:

* Send or post sexually explicit images of themselves
* Take part in sexual activities via a webcam or smart phone
* Have sexual conversations by text or online.

Abusers may threaten to send images, video or copies of conversations to the young person's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the sexual abuse has stopped.

Although inter agency working and information sharing are vital in identifying and tackling all forms of abuse, it is clear they are especially important to identify and prevent child sexual exploitation.

**Wider Safeguarding Issues**

Staff should all be made aware that there are wider issues such as forced marriage, domestic violence and gang-related issues.  Our staff safeguarding board will identify information about these wider issues.

## Child criminal exploitation: county lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

* can affect any child or young person (male or female) under the age of 18 years;
* can affect any vulnerable adult over the age of 18 years;
* can still be exploitation even if the activity appears consensual;
* can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
* can be perpetrated by individuals or groups, males or females, and young people or adults; and
* is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

## Domestic abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

* psychological;
* physical;
* sexual;
* financial; and
* emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

**NSPCC**- UK domestic-abuse Signs Symptoms Effects

Refuge what is domestic violence/effects of domestic violence on children

Safelives: young people and domestic abuse

**Homelessness**

We should always be mindful of potential situations and safeguarding implications where families are homeless and where 16 and 17 year-olds who are living independently from their parents or guardians.

# 11. ONLINE SAFETY

As schools and colleges increasingly work online it is essential that children are safeguarded from potentially harmful and inappropriate online material, such as child sexual exploitation; radicalization; sexual predication- technology often provides the platform that facilitates harm. As such, we should ensure appropriate filters and appropriate monitoring systems are in place. We carefully consider our responsibility to safeguard and promote the welfare of children, and provide them a safe environment in which to learn. We take into consideration the age range of our pupils, the number of pupils, how often they access the school’s IT system and the proportionality of costs versus the risks in our delivery of computing and IT. The appropriateness of any filters and monitoring systems are a matter for individual schools and will be informed, in part, by the risk assessment required by the Prevent Duty.

Additional information and guidance to support this area is provided in Annex C of KCSIE 2018 via a recommended link to UKCCIS.

At Tower College we ensure children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. An effective approach to online safety empowers us to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

* content: being exposed to illegal, inappropriate or harmful material
* contact: being subjected to harmful online interaction with other users
* conduct: personal online behaviour that increases the likelihood of, or causes, harm

We may include covering these relevant issues through personal, social, health and economic education (PSHE), in assemblies,  through sex and relationship education (SRE) and through ICT and Computing lessons as part of the curriculum.  Reinforcement of these important messages is crucial.

Although appropriate blocking is essential, there should not be so much that it restricts children’s learning. Whilst it is essential that we ensure that appropriate filters and monitoring systems are in place, we should be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

##  Staff E-Safety Training

At Tower College, staff undergo regularly updated safeguarding training. Children are taught about safeguarding, including online, and is age-relevant. Online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

**Information and support**

 There is a wealth of information available to support teachers, pupils and parents in keeping their children safe online.

The following is not exhaustive but should provide a useful starting point:

www.thinkuknow.co.uk

www.disrespectnobody.co.uk

www.saferinternet.org.uk

www.internetmatters.org

www.pshe-association.org.uk

educateagainsthate.com

[www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation](http://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation)

# 12. FGM

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

The DSL will organise compulsory training for staff to raise awareness about FGM. It is mandatory to report any FGM and this came into force in October 2015.  Contacts can be found towards the end of this section.

*Keeping Children Safe in Education (2016)* also acknowledges Female Genital Mutilation as a specific safeguarding issue and often includes include honour-based violence:

Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon professionals to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. It will be rare for teachers to see visual evidence, and they should **not**be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. **Those failing to report such cases will face disciplinary sanctions.**  Staff should refer concerns or disclosures to the DSL who will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with policy and Children’s Services.

**Contacts:**

**Social Services First Response Team: 01744 676600**

**Out of Hours Service: 08450 500148**

All staff must be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM, with specific regard to our international children from countries known to practice FGM such as Kenya and Nigeria. There is a range of potential indicators that a child or young person maybe at risk of FGM which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

## MANDATORY REPORTING OF KNOWN CASES OF FGM

The Government announced that the duty of reporting FGM has come into force as of 31 October 2015, and has published procedural information and advice about the new duty.

This can be found at: [**Mandatory Reporting of FGM**](https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)**(Click)**

**FGM Helpline:** **0800 028 3550**email: fgmhelp@nspcc.org.uk.

**If you know someone in immediate danger**

 [Contact the police](https://www.gov.uk/contact-police) if you think that a girl or young woman is in immediate danger of FGM. You should also contact the Foreign and Commonwealth Office if she’s already been taken abroad.

**Foreign and Commonwealth Office: 020 7008 1500**from overseas: **+44 (0)20 7008 1500**

You can also contact the nearest [British embassy](https://www.gov.uk/government/world) if you’re already abroad.

This information has been circulated this to members of staff and governors.

# 13. PREVENTION OF RADICALISATION

Extremism goes beyond terrorism and is defined in the Government’s Counter Extremism Strategy as vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of armed forces as extremism. Extremists often target the vulnerable – including the young – by seeking to sow divisions between communities on the basis of race, faith or denomination; justifying discrimination towards women and girls; seeking to persuade others that minorities are inferior; or arguing against the primacy of democracy and the rule of law in our society.

All staff should be alert to pupils attempting to access online and via ‘apps’ material that could be used in an attempt to radicalise children. This is part of the Prevent Duty, necessary in educational establishments. A guidance for teacher’s booklet is pinned to the safeguarding notice board in the staff room.  All staff will be given formal Prevent training as part of their induction to school.

The Counter-Terrorism and Security Act 2015 places a duty on education and other children’s services to have due regard to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty.  The following guidance is written with regard to section 26 of the Counter- Terrorism and Security Act 2015; which defines Extremism as ‘vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas’ (KCSIE July 2015).

The most significant threats are currently from terrorist organisations in Syria and Iraq, and Al Qa’ida associated groups. However, terrorists associated with the extreme right also pose a continued threat.

There is no place for extremist views of any kind in our School. Our pupils see our School as a safe place where they can explore controversial issues safely and where our teachers encourage and facilitate this. As a School we recognize that extremism and exposure to extremist views can lead to poor outcomes for children and so should be addressed as a safeguarding concern. We also recognize that if we fail to challenge extremist views we are failing to protect our pupils.

Any concerns about a child suspected of involvement in extremist groups, terrorism or who could be vulnerable to radicalisation must be reported to the DSL. The DSL is aware of their duty to report such concerns to ‘Channel’ under the Prevent Strategy and to Social Services.

Identifying pupils at risk of Radicalisation: There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances. Examples of influences that make individuals vulnerable to engagement with an extremist group, cause or ideology include:

* feelings of grievance and injustice
* feeling under threat
* a need for identity, meaning and belonging
* a desire for status
* a desire for excitement and adventure
* a need to dominate and control other
* susceptibility to indoctrination
* a desire for political or moral change
* opportunistic involvement
* family or friends involvement in extremism
* being at a transitional time of life
* being influenced or controlled by a group
* relevant mental health issues

**Example indicators that an individual is engaged with an extremist group, cause or ideology include:**

* spending increasing time in the company of other suspected extremists
* changing their style of dress or personal appearance to accord with the group
* behaviour becoming increasingly centred around an extremist ideology, group or cause
* loss of interest in other friends and activities not associated with the extremist ideology,
* possession of material or symbols associated with an extremist cause
* attempts to recruit others to the group/cause/ideology

Intent to cause harm: Not all those who become engaged by a group, cause or ideology go on to develop an intention to cause harm, so this dimension is considered separately. Intent factors describe the mindset that is associated with a readiness to use violence and address what the individual would do and to what end. They can include:

* Over-identification with a group or ideology
* ‘Them and Us’ thinking
* de-humanisation of the enemy
* attitudes that justify offending
* harmful means to an end
* harmful objectives

**Example indicators that an individual has an intention to use violence or other illegal means include:**

* clearing identifying another group as threatening what they stand for and blaming that
* and blaming that group for all social or political ills
* using insulting or derogatory names or labels for another group
* speaking on the imminence of harm from the other group and the importance of action now
* expressing attitudes that justify offending on behalf of the group, cause or ideology
* condoning or supporting violence or harm towards others
* plotting or conspiring with others

School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. The School’s *Preventing Extremism and Radicalisation Policy*should be referred to when reading this Safeguarding Policy.

## So-called ‘honour-based’ violence

So-called ‘honour-based’ violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

**Actions**

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers** that requires a different approach (see separate section on FGM).

14. SIGNS OF ABUSE

Signs such as those mentioned below can do no more than give rise to concern - they are not in themselves proof that abuse has occurred, but trusted adults should be aware of the possible implications of, and be alert to, all such signs.

It is always preferable to prevent or reduce the risk of abuse through effective early intervention and help. Because of their day-to-day contact with individual children, school staff are particularly well placed to observe outward symptoms or abnormality or changes in appearance, behaviour, learning pattern or development. Such symptoms may of course be due to a variety of other causes, including bereavement or other disruption in the family, peer group or social circumstances. However, staff should be particularly mindful of a child who:

* exhibits significant changes in behaviour
* deterioration in children’s general well-being
* unexplained bruising, marks or signs of possible abuse or neglect
* children’s comments which give cause for concern
* any reasons to suspect neglect or abuse outside the setting, for example in the child’s home; and/or inappropriate behaviour displayed by other members of staff for example excessive one to one attention beyond usual role or responsibilities
* repeated minor injuries
* children who are dirty, smelly, poorly clothed or who appear underfed
* children who have lingering illnesses which are not attended to, deterioration in school work, or significant changes in behaviour, aggressive behaviour, severe tantrums
* an air of 'detachment ’or ‘don’t care’ attitude
* overly compliant behaviour
* a ‘watchful attitude’
* sexually explicit behaviour eg playing games and showing awareness which is inappropriate for the child’s age
* a child who is reluctant to go home, or is kept away from school for no apparent reason
* does not trust adults, particularly those who are close
* ‘tummy pains’ with no medical reason
* eating problems, including over-eating, loss of appetite
* disturbed sleep, nightmares, bed wetting
* running away from home, suicide attempts
* self-inflicted wounds
* reverting to younger behaviour
* depression, withdrawal
* relationships between child and adults which are secretive and exclude others

*The NSPCC(2015)*

# 15. SAFEGUARDING PROCEDURES

# Safeguarding Procedure 1 – Child in Need of Help

When it is felt that a child is in need of help and support but significant harm has not been identified, the School will consider referral to Children’s Social Care Services as a ‘child in need’  (Section 17 Children Act 1989). In this connection the School, in conjunction with other agencies, may consider the use of the Family Support Process (FSP) or other approaches (such as use of the “Common Assessment Framework (CAF)” and/or the “Team around the Child” (TAC).) under the guidance of Children’s Services. The Local Safeguarding Children Board (LSCB) for St Helens can be found at:  [www.sthelenslscb.org.uk](http://www.sthelenslscb.org.uk/)

We recognise that decisions to seek support for a child in need would normally be taken in consultation with parents/guardians and the pupil(s), although it is clear that there is no need for their consent for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.

**Staff concerns about a child**Staff will need to decide what action to take. Where possible, there should be a conversation with the Designated Safeguarding Lead to agree a course of action, although any staff member can make a referral to children’s social care. Other options could include referral to specialist services or early help services and should be made in accordance with the referral threshold set by the Local Safeguarding Children Board.

**Staff concerns about a child in immediate danger**

If a child is in immediate danger or is at risk of harm a referral should be made to children’s social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the Designated Safeguarding Lead the Designated Safeguarding Lead should be informed, as soon as possible, that a referral has been made.

**FGM**

If a **teacher**, in the course of their work in the profession, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 the **teacher**must report this to the police.

# Safeguarding Procedure 2 - When abuse or likely abuse is alleged

The relationship which trusted adults have with children in their charge is based on mutual respect and trust; such relationships are an integral feature of the School’s ethos and of a secure, caring environment which fosters pupils’ learning and personal development.

**When abuse is alleged, the trusted adult MUST:**

* Take the child's claim seriously, be accessible and receptive.
* Reassure the child that they are right to tell them.
* Never promise confidentiality – but instead should tell the child that in order to help you will have to pass the information on to a trusted professional.
* Listen to the child; do not interrupt if he/she is freely recalling significant events.
* Ensure that any discussion is confirmatory and not investigative. Staff must not investigate as this is the legal duty of the local authority where the child is living at the time of the actual concern.
* Keep a written record/note of the discussion and record on the Schools ‘Safeguarding Concerns Form’. The form must be filled in by hand and record the time, date, place and people who were present, as well as what was said. Signs of physical injury observed should be described in detail, or sketched, but under no circumstances should a child's clothing be removed. Your note of the discussion may need to be used in any subsequent court proceedings and must therefore distinguish fact from opinion.
* Hand the completed form immediately to the appropriate Designated Safeguarding Lead, or in their absence, the Principal. The form must be hand-written in ink and signed and dated. No copies of the form should be made as this is a confidential document for the Designated Safeguarding Lead in the first instance.
* In an emergency, contact St Helens Safeguarding Children Board - see page 2 of this policy for the telephone number, or dial 999.
* Observe confidentiality with colleagues, family and friends

**When abuse is alleged, the trusted adult must NOT:**

* Give an undertaking of confidentiality or say that they can keep „secrets‟, but must reassure the child that information will only be disclosed to those who need to know.
* Tell the child that everything will be alright.
* Ask leading questions - this could be interpreted later as putting ideas into the child's mind. e.g. staff should not ask "Did they do X to you?" (leading question) but rather, ‟Tell me what happened‟ (open-ended). Staff should not ask, ‟Did x do this to you? ‟  (leading) but rather, “Do you want to tell me who did this?‟ (open-ended).
* Take photos or examine the injury.
* React with shock, anger or horror, or jump to conclusions.
* Confront or accuse another person allegedly involved.
* Fail to record what they have been told.
* Fail to pass the information on.

# Safeguarding Procedure 3 - Peer on peer abuse

**All**staff should be aware safeguarding issues can manifest themselves via peer on peer abuse. We will endeavour to minimise the risk of peer on peer abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), sexual violence, sexual harassment and sexting.

Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm is also peer on peer abuse.

All staff should be clear as to the school or college’s policy and procedures with regards to peer on peer abuse. Additional information regarding peer on peer abuse is in Annex A of KCSIE (2018). We will endeavour to minimise the risk of peer on peer abuse by being vigilant during lessons and at breaks, referring to CCTV cameras if needed, investigating promptly, intervening when needed, communicating with parents and educating our pupils about consideration for others.

We can all play a part in helping to keep children safe from bullying and we recognise that bullying has a link to safeguarding issues which we, as professionals, have a reponsibility to monitor, report and act upon.  Staff should recognise that children are capable of abusing their peers. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting. Staff should be clear as to the school or college’s policy and procedures with regards to peer on peer abuse, as detailed below. Abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up".  At Tower College we use a variety of procedures to minimise risk, different ways of investigating allegations and we support victims and perpetrators of peer abuse.  For any incident of alleged bullying in the form of peer abuse, pupils can also find help online themselves via kidpower.org or through other reputable online organisations.

We are aware that sexting (also known as youth produced sexual imagery) is a growing problem, often happening outside the school setting but often manifesting itself in school through repercussions.  We will follow up any allegation of sexting and will report any serious findings to the local safeguarding board and/or the local police.  As mobile phones are not allowed in Tower College, pupils will risk a searching, screening and confiscation (in line with DfE guidance, January 2018) if they bring them into school and are caught with inappropriate images.

Gender-based bullying is also something for awareness and concern, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

It is more likely that girls will be victims and boys perpetrators, but all peer on peer abuse is unacceptable and will be taken seriously.

Initiating hazing type violence and rituals will also be seen as peer on peer abuse and will be investigated and dealt with appropriately.

Stopping bullying requires that the adults in charge stay aware, set a good example, intervene to stop unsafe behaviour, and teach personal safety skills to the young people in their lives.

In the case of dealing with abuse of a pupil by one or more pupils, the priority is to protect the interests of the abused pupil, working according to procedures laid out in this document. Where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm, the relevant designated person will then consult with the relevant Head of Department and the Principal and report concerns to the St Helens SCB.

Bullying incidents can be treated as a child protection concern when there is “reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm‟. In these circumstances St Helens SCB should be alerted to the issue in order to provide help and support to both the alleged victim and alleged perpetrator.

## Minimising Abuse

* teacher knowledge and observations
* positive language about relationships in classrooms, around school and in assembly
* educating about developing strong, positive relationships
* PHSE lessons
* good pupil supervision during breaks and lunch times - aided by the fact that our supervision is conducted by teaching staff, which gives extra vigilance
* raising awareness of the effects of peer abuse
* following up all allegations made and taking each one seriously. Bullying will not be ignored.
* involving parents by informing them via our behaviour log.
* encouraging pupils to report bullying.

## Investigating

* Logged conversations with pupils involved directly and anyone who may have been a witness
* Asking for tangible evidence, such as screenshots, written notes or conversations Looking for patterns on the school behaviour portal
* Asking staff for feedback Inviting parents into school
* Written pupil accounts which will be kept on file

## Supporting Victims

* Maintaining confidentiality where possible
* Encouraging pupils to talk and report as soon as possible
* Eradicating the culture of being a "grass"
* Raising awareness of situations with other staff so incidents can be dealt with immediately
* Providing a link with a trusted senior pupil/prefect
* Informing pupil of external help eg CAMHs, BOSS online services and websites

## Outcomes of Bullying

Each case is considered individually. There is no quick-fix solution and not every solution fits the circumstances. However, a range of outcomes may be considered, and this is not an exhaustive list.

Pupils who bully can expect to:

* explain their behaviour to their Head of School: either Mrs O'Grady, Mr Wells or Mrs Knox;
* explain their behaviour to Miss Oxley, the Principal;
* write letters of apology or give a face-to-face apology;
* be involved in a meeting and communication with their family; listen to what the victim has to say to them;
* face a suspension from school for a specific length of time; be permanently excluded from school if incidents continue; miss a reward trip;
* serve a detention;
* have any written reports in their personal file;
* be placed on behaviour report, which describes how to behave in school and what will happen if this is not compliant.

Depending on the age and circumstances, pupils proven to be involved in serious cases of bullying may be permanently excluded from school.

## Supporting Bullies

It is important to establish if the bully has been bullied and deal with this separately. Offer parents of bullies and pupils’ readable literature about bullying. We try to teach forgiveness as part of Tower College life as well as teaching pupils how to put right the error of their ways. Assemblies can be very supportive in these circumstances. Guiding pupils towards more positive activities should be considered eg D of E, MUN etc. PHSE is often a good channel to address peer abuse.

Useful websites

[www.anti-bullyingallian ce. org.uk](http://www.anti-bullyingalliance.org.uk/) [www.compassionlt.com/Anti-Bullying](http://www.compassionlt.com/Anti-Bullying) [www.youngm inds.co.uk](http://www.youngminds.co.uk/)

## Child on child sexual violence and sexual harassment (Part 5 KCSIE, 2018)

At Tower College, we recognise a need to be aware and have training in child on child sexual violence and sexual harassment.  We will refer to guidance set down in the document from the DfE (May 2018) – Sexual violence and sexual harassment between children in schools and colleges.

**What is Sexual violence and sexual harassment?**

**Sexual violence**

It is important that school staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

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

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

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

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

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

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

* sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
* sexual “jokes” or taunting;
* physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
* online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence 108

It may include:

* non-consensual sharing of sexual images and videos;
* sexualised online bullying;
* unwanted sexual comments and messages, including, on social media; and
* sexual exploitation; coercion and threats

## Responding to reports of sexual violence and sexual harassment

There is a need for effective training which we will provide to staff at Tower College.

We will respond on a case-by-case basis, supported by children’s social care and the police if required.

**The immediate response to a report**

On receiving an allegation, we will respond immediately to any report from a child. All victims must be taken seriously (and reassured of this), supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.  All staff will be trained to manage a report, as with any safeguarding concern.

**Risk Assessment**

Following a report of sexual violence, the designated safeguarding lead (or deputy) should make an immediate risk and needs assessment, considering:

* the victim
* the alleged perpetrator
* all other children (and if appropriate adult students and staff).

Risk assessments should be recorded and kept under review.

The designated safeguarding lead (or deputy) should ensure they are engaging with children’s social care and specialist services as required.

## Action following a report of sexual violence and/or sexual harassment

**What to consider**

 At Tower College, we will consider:

* the wishes of the victim in terms of how they want to proceed
* the nature of the alleged incident
* the ages of the children involved
* the development stages of the children involved
* any power imbalance between the children
* is the incident a one-off or a sustained pattern of abuse
* are there ongoing risks to the victim, other children, school or college staff
* contextual safeguarding issues

As always, all staff should act in the best interests of the child.

Our message to everyone in our school community is that sexual violence and sexual harassment is not acceptable and will not be tolerated.

**Options to manage the report**

Here are four scenarios to consider when managing any reports of sexual violence and/or sexual harassment.

1. Manage internally – the school manages incidents.
2. Early help – multi-agency early help
3. Referrals to children’s social care
4. Reporting to the police – in parallel to children’s social care

**Considering bail conditions**

It is unlikely that a child will be on police bail with conditions attached, so it is essential that when there is a criminal investigation that there is joined up working between Tower College, children’s social care and the police so that the victim, alleged perpetrator and other children involved are supported.

## Managing any delays in the criminal process

There may be delays in any criminal case but we **should not wait**for the outcome before protecting the victim, alleged perpetrator and other children in the school.

**The end of the criminal process**

Regardless of whether a child is convicted of a crime or not, all the children involved should be protected.

**Ongoing response for the victim**

Appropriate support should be available on an ongoing basis to the victim. The guidance includes sources of specific support. Pg.72 The guidance makes it clear that we need to consider safeguarding issues around the victim and alleged perpetrator sharing classes and sharing space at school or college.

**Safeguarding and supporting the alleged perpetrator**

We will need to manage the balance between supporting the victim and ensuring the alleged perpetrator has an education and safeguarding support themselves.

## Looked after Children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. Governing bodies and proprietors should ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken on concerns to safeguard these children, who are a particularly vulnerable group.

Staff need to be aware of the legal status of a looked after child’s care arrangements. In particular, it is important that appropriate staff have the information they need in relation to a child’s looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. Appropriate staff should also have information about the child’s care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The Designated Safeguarding Lead should have details of the child’s social worker and the name of the virtual school head in the authority that looks after the child.

In Tower College, any looked after child will be appointed a designated teacher to promote the educational achievement of the child and to ensure that this designated teacher has appropriate training. On commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers will have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.  The designated teacher should also work with the virtual school head to promote the educational achievement of previously looked after children.

**Virtual Head**

Virtual school heads receive pupil premium plus additional funding based on the latest published numbers of children looked after in the authority. The designated teacher should work with the virtual school head to discuss how that funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child’s personal education plan.

## Children with special educational needs and disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. We recognise the fact that additional barriers can exist when recognising abuse and neglect in this group of children. Tower College's SENCo will need to be aware of any staff concerns and should report any concerns about any child with SEN and/or disabilities.  The SENCo may be consulted if any allegation of concern is raised.

This can include:

* assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration;
* being more prone to peer group isolation than other children
* children with SEN and disabilities can be disproportionally impacted by things like bullying - without outwardly showing any signs; and
* communication barriers and difficulties in overcoming these barriers

To address these additional challenges, schools and colleges should consider extra pastoral support for children with SEN and disabilities. At Tower College, time is available for pupils with SEN and disabilities to have time with SENCo and/or support staff to discuss issues and concerns.

## The use of ‘reasonable force’

There are circumstances when it is appropriate for staff at Tower College to use reasonable force to safeguard children and young people. The term ‘reasonable force’ covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a pupil needs to be restrained to prevent violence or injury. ‘Reasonable’ in these circumstances means ‘using no more force than is needed’. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil’s path, or active physical contact such as leading a pupil by the arm out of the classroom.

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, schools and colleges should in considering the risks carefully recognise the additional vulnerability of these groups. They should also consider their duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty. By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, schools and colleges can reduce the occurrence of challenging behaviour and the need to use reasonable force.

Training will be given to staff in this area.

## Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. In the instance of a child in our care being in these circumstances, we will communicate with the family and monitor the child throughout.

# Safeguarding Procedure 4 – DSL and Deputy DSL responsibilities - in line with Annex B of KCSIE 2016

The School’s Child Protection Officers (DSL and Deputy DSL) are responsible for co-ordinating action and informing the Principal on the same day the concerns are first reported. Either the Principal or a Child Protection Officer contacts St Helens SCB within 24 hours of a disclosure or suspicion of abuse, and completes a Multi-Agency Referral Form.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to St Helens SCB and/or the police.  All contact details are on Page 2 of this document. **Anybody can make a referral**. If the child’s situation does not appear to be improving, the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.

Whether suspicions arise through disclosures children make, or as a result of observations, the member of staff concerned should refer the matter immediately to the DSL and complete a Safeguarding Concern Form.

The DSL and Deputy DSL should not make their own decision over what appears to be borderline cases. He/she should discuss the case immediately with the Principal. In borderline cases the DSL must seek further advice from St. Helens SCB.

In the case of an EYFS pupil, the School must notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

# Safeguarding Procedure 5 - Allegations against staff or volunteers

In the event of suspected child abuse involving a member of staff or a volunteer in one  of the Schools, the relevant School will adhere to the guidelines as set out in both Keeping Children Safe in Education (September 2018) and by the St Helens SCB Partnership. The following will be applied:

1. **Quick Resolution** - the quick resolution of any allegation against a member of staff must be a clear priority to the benefit of all concerned. At any stage of consideration or investigation (not to be carried out by the School – see below), all unnecessary delays should be eradicated.
2. **Report to The Principal on the same day** - any concerns relating to alleged abuse by a member of staff or volunteer.
3. **Allegation against the Principal** - In the event of the allegation being made against the Principal, the concern must be addressed to the Chair of Governors, Mrs Karen McCormack (email: kmccormack@towercollege.com), without notifying the Principal. It will be the Chair of Governor’s responsibility to report the matter to the DESIGNATED SAFEGUARDING OFFICER and/or the police in accordance with the process above.
4. **Unsuitable staff to be reported to DBS within 1 month** Any member of staff/person who is considered unsuitable to work with children (whether employed, contracted, a volunteer, or student), where they have caused harm or posed a risk of harm to a child, whose services are no longer used by the School (including where the cessation of that person's services results from dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation, and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering because he/she is considered unsuitable to work with children) will be reported within one month of leaving the School(s) to the DBS. The School recognises that failure to report constitutes a criminal offence and may result in the DfE removing the School from the register of Independent Schools. Compromise or Settlement agreements by which a person agrees to resign, an employer agrees not to pursue disciplinary action, and both parties agree a EYform of words to be used in any future reference, will not be used in these circumstances.
5. **Referral to NCTL**- The School will also consider making a referral to the National College for Teaching and Leadership (NCTL) where a teacher has been dismissed (or would have been dismissed if he/she had not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: “unacceptable professional conduct”, “conduct that may bring the profession into disrepute” or a “conviction, at any time, for a relevant offence”. Further guidance is published on the NCTL website. Where a referral has been made to the DBS, it is not necessary for a NCTL referral, as information is shared between the two bodies. Where a dismissal does not reach the threshold for DBS referral, separate consideration should be given to an NCTL referral.
6. **Priority is the Children’s Safety**- In response to an allegation it will be a priority to ensure that the child(ren) are safe and under no perceived threat from an alleged perpetrator. The question of suspension will be weighed against this priority and the need to ensure that other children in the school are kept safe. In this context the School(s) has a duty of care to all pupils as well as other staff within the School(s). Staff suspension will not be the default position but the means to ensure there is compliance with the above priority and as a precautionary measure and without prejudice to pending further enquiries.
7. **Confidentiality** - In the event of any allegations being made against staff the School will make every effort to maintain confidentiality and guard against unwanted publicity. This will apply up to the point where the accused person is charged with an offence, or the DfE/NCTL publish information about an investigation or decision in a disciplinary case.
8. **Allegations that are found to be malicious** will be removed from personnel records and any that are not substantiated, are unfounded or malicious should not be referred to in employer references.
9. **Pupils who are found to have made malicious allegations** are likely to have breached the School’s behaviour policies and appropriate sanctions will be applied.
10. **Allegations against a teacher who is no longer teaching** should be referred to the police. Historical allegations of abuse should also be referred to the police.
11. **Employers have a duty of care to their employees.** They should ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in a school or college is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation.

At Tower College we will investigate allegations where a teacher or member of staff (including volunteers) in a school or college that provides education for children under 18 years of age has:

* possibly committed a criminal offence against or related to a child; or
* behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.

The following definitions should be used when determining the outcome of allegation investigations:

* **Substantiated:** there is sufficient evidence to prove the allegation;
* **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
* **False:** there is sufficient evidence to disprove the allegation;
* **Unsubstantiated**: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
* **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

# 16. CHILDREN MISSING FROM EDUCATION (CME)

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of and flag up any unauthorised absence and children missing from education.

At Tower College, we follow the St Helens guidance and procedures.  We have been provided with the relevant documents to follow up any concerns and the DSL has held a dedicated meeting with a staff member from St Helens SCB to confirm arrangements.

Children Missing Education (CME) refers to all children of compulsory school age who are not on a school roll, nor being educated otherwise (e.g. privately or in alternative provision) and who have been out of any educational provision for a substantial period of time (usually agreed as four weeks or more).

This means all children between the ages of 5 and 16 who are not:

* Named on a school register
* Being Educated at Home
* In any other type of Education (for example college or work experience placement)
* Who have failed to attend for at least four weeks

Section 436A of the [Education Act 1996](http://www.legislation.gov.uk/ukpga/1996/56/contents) requires local authorities to make arrangements to establish (so far as it is possible to do so) the identities of children who are missing education.  Ms. McNamara will communicate with the LA when children join or leave Tower College and, if leaving, where their next place of education (if known) is.

This means that by law the council is responsible for finding any children who are known as missing from education. Parents who do not make suitable arrangements for their child/children to access education could be subject to a [School Attendance Order](https://www.sthelens.gov.uk/schools-education/education-welfare-service/legal-sanctions-for-unauthorised-school-absence/).

Children missing education do not include:

• Children who are on holiday
• Children whose whereabouts are known by the school but are not attending school (for example if they are in hospital)
• Children who have moved to another part of the borough and are transferring schools

Where reasonably possible, schools and colleges should hold more than one emergency contact number for each pupil. This goes beyond the legal minimum and is good practice to give the school or college additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

The Education Welfare Service follows the local authority procedure for identifying and tracing children missing education.

We now have a dedicated email address for all CME enquiries: cme@sthelens.gov.uk

Contact can also be made by phone: **01744 676789**

The contact address is:

*Wesley House
Corporation Street
St. Helens, WA10 1HF*

# 17. STAFF CONDUCT

All School staff must ensure that their behaviour and actions do not place pupils and themselves at risk of allegations of harm to a pupil (e.g. conveying a pupil by car alone, or engaging in inappropriate electronic communication with a pupil). Staff can do this by always acting in a professional manner and ensuring that their actions and vigilance also promote children’s safety and well-being, including but not limited to:

Images of pupils must only be taken using School cameras. All images should be downloaded into the shared area and memory cards erased each week.

Personal digital devices, e.g. mobile phones, cameras and iPads, must not be used by children or staff to take images of children within the EYFS setting.

We acknowledge that under the Sexual Offences Act 2003 it is a criminal offence for anyone working in an educational setting to have a sexual relationship with a pupil, even when that pupil is over the age of consent. The School also acknowledges that any form of corporal punishment or initiation ceremony is prohibited.

# 18. PUPIL CONFIDENTIALITY

Information on Child Protection cases, including School Safeguarding forms, will only be shared within the School with those who need to know, to ensure the safety, dignity and privacy of the pupils concerned. We recognize that our staff have a professional responsibility to share information with other professionals who are investigating a case.

 All School records of Child Protection concerns and referrals are kept in a locked filing cabinet separately from routine pupil files and comply with the Data Protection Act 1998. Only the Child Protection Officers and the relevant Heads of Department have access to these records.

 Pupils, when confiding information to a member of staff, will be made aware that for their own sake this information cannot be kept secret but will be reassured that the information will only be shared with the designated teacher who will decide what will happen next.

# 19. CASES CONFERENCES AND CORE GROUP MEETINGS

**The Designated Safeguarding Lead will attend:**

* all Child Protection Case Conferences;
* all Core Group meetings once a child has been placed on the Child Protection Register.

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# 20. PUPILS TRANSFERRING TO ANOTHER SCHOOL

The following procedures will take place if a pupil, on the child protection register, transfers to another school:

* the case social worker will be contacted by the Designated Safeguarding Lead;
* child protection records will be passed on to the Designated Safeguarding Lead at the receiving school only if that school is in the same Local Authority;
* if the child is moving to another Local Authority, then information will only be passed on with outline details of case conferences but not minutes of conferences.

# 21. WHISTLEBLOWING

 Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. Procedures are in place and ready to be followed in regard to whistleblowing if staff are concerned that an adult in a position of trust may be bullying or abusing a child or young person.

Staff have a responsibility to speak up about safeguarding and welfare matters within the school and to external agencies where necessary. This is one part of establishing a positive safeguarding culture in the school.

Please refer to the school’s Whistleblowing Policy for full details.

**Concerns about a Headteacher or Principal who is also the sole proprietor of an independent school.**In the event of allegations of abuse being made against the Headteacher/Principal, where the Headteacher/Principal is also the sole proprietor of an independent school, allegations should be reported directly to the designated officer(s) at the local authority. Staff may consider discussing any concerns with the school’s designated safeguarding lead and make any referral via them.

**Alternative reporting**

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally.

Staff can call: **0800 028 0285** – line is available from 8:00 AM to 8:00 PM, Monday to Friday Email: help@nspcc.org.uk

# 22. EYFS SAFEGUARDING ARRANGEMENTS

The **designated person** for child protection in this early years setting is: **Andrea O’Grady**

Contact details:    mrsogrady@towercollege.com      **0151 426 4333**

We will ensure every staff member (including temporary / supply staff / volunteers / students) and the governing body know the name of the designated person responsible for safeguarding children.

## Roles and responsibilities

All early years settings must nominate a senior member of staff to coordinate child protection arrangements.

We will ensure that the Designated Safeguarding Person:

* is appropriately trained
* acts as a source of support and expertise to the setting
* has an understanding of LSCB procedures
* keeps written records of all concerns when noted and reported by staff or when disclosed by a child, ensuring that such records are stored securely and reported onward in accordance with this policy guidance, but kept separately from the child’s general file
* refers cases of suspected neglect and/or abuse to children’s social care or police in accordance with this guidance and local procedure
* develops effective links with relevant statutory and voluntary agencies
* ensures that all staff sign to indicate that they have read and understood this policy
* ensures that the child protection policy is updated annually
* keeps a record of staff attendance at child protection training and makes this policy available to parents.

## Good practice guidelines

To meet and maintain our responsibilities towards children, the setting agrees to the following standards of good practice:

* to treat all children with respect
* to set a good example by conducting ourselves appropriately
* to ensure the staff are positive role models to children and other members of the team and never engage in rough, physical or sexually provocative games
* to involve children in decision-making which affects them (taking age and development of children into account)
* to encourage positive and safe behaviour among children
* to be a good listener
* to be alert to changes in a child’s behaviour
* to recognise that challenging behaviour may be an indicator of abuse
* to read and understand all of the setting’s safeguarding and guidance documents on wider safeguarding issues, for example, physical contact and information-sharing
* to ask the child’s permission before doing anything for them which is of a physical nature, such as assisting with dressing or administering first aidto maintain appropriate standards of conversation and interaction with and between children and avoid the use of sexualised or derogatory language
* to be aware that the personal and family circumstances and lifestyles of some children lead to an increased risk of neglect and or abuse
* to raise awareness of child protection issues and equip children with the skills they need to keep themselves safe
* to provide any form of manual or physical support required, as a last resort and to do so openly and appropriately, and to always consult the children and gain their agreement (taking age and development of children into account)
* to establish a safe environment in which children can learn and develop, particularly in their confidence and self-esteem and to provide opportunities for achievement in accordance with the Statutory Every Child Matters Framework: Being Healthy, Staying Safe, Enjoy and Achieve, Positive Contributions & Economic Well-being.

## Intimate/Personal care

Children’s dignity will be preserved and a level of privacy ensured. Should children wear nappies, the normal process of nappy changing should not raise child protection concerns. There are no regulations that indicate that a second member of staff must be available to supervise the nappy changing process to ensure that abuse does not occur, but we ensure that staff do not leave themselves vulnerable and will always work in an open environment by avoiding private or unobserved situations or closing doors to toilet areas.

## Behavioural expectations to ensure children are safe and to ensure false accusations are avoided.

Whilst caring for other people’s children, we are in a position of trust and our responsibilities to them and the ‘organisation’ must be uppermost in practitioners’ minds at all times.

We do not:

* use any kind of physical punishment or chastisement such as smacking, hitting or rough handling
* behave in a way that frightens or demeans any child
* use any racist, sexist, discriminatory or offensive language
* engage in rough or physical games, including tickling or horseplay
* let allegations a child makes go unchallenged, unrecorded or not acted upon

## Use of mobile phones

Mobile phones have a place in settings, especially on school trips and staff are able to use them during their own break times (not in view of the children, including the EYFS). To protect children, we will:

* only use mobile phones appropriately, and ensure staff have a clear understanding of what constitutes misuse
* ensure the use of a mobile phone does not detract from the quality of care of children
* ensure all mobile phone use is open to scrutiny
* store mobile phones (away in staff handbags / coat pockets / locked away in desks on silent) whilst staff are teaching / on playground duty / in contact with the children
* ensure any staff known or seen to be using a mobile phone will be disciplined
* prohibit staff from using their mobile phones to take pictures of the children attending the setting
* ensure the use of mobile phones on outings is included as part of the risk assessment; for example, how to keep personal numbers that may be stored on the phone safe

## Cameras: photography and images

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

* obtain parents’ and carers’ consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
* use only the child’s first name with an image
* ensure that children are appropriately dressed
* ensure the setting’s designated camera is only used in the setting
* Images taken on the setting’s camera will not be emailed as it may not be secure.
* ensure that if photographs or videos of children are to be taken in the setting, the setting’s own equipment will be used
* ensure all cameras used are open to scrutiny

## Children who may be particularly vulnerable

To ensure that all of children receive equal protection, we will give special consideration and attention to children who are:

* disabled or have special educational needs
* living in a known domestic abuse situation
* affected by known parental substance misuse
* asylum seekers
* living in temporary accommodation
* living transient lifestyles
* living in chaotic, neglectful and unsupportive home situations
* vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality
* do not have English as a first language

##  Support for those involved in a child protection issue

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

We will support the children and their families and staff by:

* taking all suspicions and disclosures seriously
* responding sympathetically to any request from a member of staff for time out to deal with distress or anxiety
* maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
* storing records securely
* offering details of help lines, counselling or other avenues of external support
* following the procedures laid down in our whistle blowing, complaints and disciplinary procedures
* cooperating fully with relevant statutory agencies

## Allegations against a member of the family/staff

The EYFS statutory framework states: ‘Registered providers must inform Ofsted of these allegations as soon as reasonably practicable.’ A registered provider, who without a reasonable excuse fails to comply with this requirement, commits an offence’. An allegation of child abuse made against a member of the family or staff may come from a parent, another member of staff or from a child’s disclosure.

The setting will:

* report such allegations in the same way as any other child protection referral
* record the details that give cause for concern
* contact The Local Authority Designated Officer (DESIGNATED SAFEGUARDING OFFICER)
* inform the designated officer
* instigate the disciplinary procedure, due to the serious nature of the concerns, and suspend the member of staff until a full investigation has taken place
* cooperate fully with the process of Social Care and the Police investigations
* support and treat with respect the member of staff whilst suspended
* ensure, if it appears from the results of the investigation that the allegations are justified, that disciplinary action will follow, in full consultation with the management committee and with legal advice
* where it seems likely that ‘on balance of probabilities’ abuse may have taken place, be able in law to dismiss the individual and refer them to the PoCA list
* if the result is that it was a false allegation, give the individual appropriate support

## Whistleblowing

Any individual who has reasonable suspicion of malpractice should inform the Head of Pre-Prep immediately. If they do not feel this is the appropriate person they can contact the Vice Principal, the Principal,   ISI or Early Years Consultant (EYC) at St Helens Local Authority.  It is recognised for some people that this can be a daunting and difficult experience.

All reports will be investigated in confidence, including only those staff on a ‘need to know’ basis.

 Whistle blowing at Ofsted Hotline: To contact the hotline call 0300 123 3155 (Monday to Friday from 08.00 to 18.00), email whistleblowing@ofsted.gov.ukor write to WBHL, Ofsted, Royal Exchange Buildings, Piccadilly Gate, Manchester M1 2WD.

A charity called ‘Public Concern at Work’ give free and confidential advice and can help you to decide whether and/or how to raise your concerns at work first. You can call Public Concern at Work on 020 7404 6609, email helpline@pcaw.co.ukor visit[www.pcaw.co.uk/law/uklegislation.htm](http://www.pcaw.co.uk/law/uklegislation.htm) for useful information about whistle blowing legislation.

All concerns of poor practice or concerns about a child’s welfare brought about by the behaviour of colleagues should be reported to the designated safeguarding person and/or manager. Complaints about the designated safeguarding person/manager should be reported to SPA.

## Staff training

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. Child protection training is mandatory for all staff and will be part of their induction process. The Designated Safeguarding Person Andrea O’Grady will ensure that the staff’s knowledge, understanding and practice of safeguarding children are current and up-to-date at all times. Where gaps are identified support and training will be mandatory. The Designated Safeguarding Person will receive updated training at least every three years, including training in inter-agency procedures and Common Assessment Framework (CAF) to support for their roles.

# 23. INSPECTION

Inspectors will always report on whether or not arrangements for safeguarding children and learners are effective.

# 24. REVIEW

This policy, its related procedures and the effectiveness of its implementation are reviewed annually by the Board of Governors, signing it off as a corporate body after it has been discussed by them.

It is the role of the Board of Governors to ensure this policy is both effective and implemented. The DSL presents an annual written report to the Board of Governors, including: a record of training for the year; referral information in respect of requests for help and support for individual children; any allegations made against staff; any issues and themes which may have emerged in the Schools and how these have been handled, including action(s) taken; the contribution the Schools are making to multi-agency working in individual cases or local discussions on safeguarding matters.

The named Governor for Child Protection reports termly to the Governors on Safeguarding matters arising out of her termly meetings with the School’s Child Protection Officers. Any deficiencies or weaknesses identified in child protection arrangements are remedied without delay.

The Governors are also to complete the same Safeguarding audit as the DSL and SMT

**Significant Policy Update:** November 2017

**Date of Last Review:** September 2018 (all changes / additions shown in green)

**Date of Next Review:** September 2019