

CLIFTON
COLLEGE


Safeguarding and Protecting Children Policy

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APPROVED BY:

| Name: | Role: | Signature: | Date: |
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| Mark Eldridge | Chair of the Safeguarding and Welfare Committee |  | 05/09/2019 |
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1. DEFINITIONS

Safeguarding is defined as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Child Protection refers to the situation where a child is suffering significant harm, or is likely to do so, and action is required to protect that child.

Deputy Head Cross-College Safeguarding (DHS) has lead responsibility for the Safeguarding Team.

Designated Safeguarding Lead (DSL) is a senior member of staff from the leadership team who has lead responsibility for safeguarding and child protection (including online safety).

Keeping Children Safe in Education (KCSIE) 2019 is statutory guidance from the Department of Education issued under Sec 175 Education Act 2002, the Education (Independent Schools Standards) Regulations 2014, and the Non-Maintained Special Schools (England) Regulations 2015.

Child/Children everyone under the age of 18 years.

2. INTRODUCTION

At Clifton College, safeguarding and promoting the welfare of children is **everyone's responsibility**. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children, irrespective of their role within the College. 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. **Everyone** who comes into contact with children and young people has a role to play in identifying concerns, sharing information and taking prompt action.

The College is committed to safeguarding and promoting the welfare of children by:

- the provision of a safe environment in which children and young people can learn; and
- fulfilling our statutory (legal) responsibilities to identify children who may be in need of early help or who are suffering, or are likely to suffer, significant harm.

This policy is also designed to address the College's charity law safeguarding duty to:

- provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff and volunteers;

- set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly;
- have adequate safeguarding policies, procedures and measures to protect people; and
- provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the Charity Commission.

All actions taken by the College will be in accordance with:

Current Legislation:

- Education (Independent School Standards) Regulations 2014;
- Boarding Schools: national minimum standards;
- Statutory Framework for the Early Years Foundation Stage 2017;
- Education and Skills Act 2008;
- Children Act 1989;
- Childcare Act 2006;
- Children and Social Work Act 2017;
- Data Protection Act 2018 and General Data Protection Regulation (GDPR);
- Equality Act 2010; and
- Charities Act 2011.

Statutory Guidance:

- *Working Together to Safeguard Children* (2018), which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of schools;
- *Keeping Children Safe in Education* (2019) is statutory guidance issued by the Department for Education which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children;
- *The Teacher Standards* (2012) which states that teachers, (including head teachers), should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. (Key documentation, procedures & guidelines are detailed in Appendix 2); and
- *South West Child Protection Procedures*, which provides agencies in the South West of England with multi-agency child protection procedures.

This policy applies at all times even where pupils or staff are away from the College, including core College activities; out of hours and commercial activities. The Policy applies to all staff (teaching and non-teaching), contractors; volunteers working in the College and members of the College Council. It should be read in conjunction with the following policies:

- Recruitment, Selection and Disclosure Policy;
- Whistleblowing Policy;

- Code of Conduct for Staff;
- Anti-Bullying Policy;
- Upper School & Preparatory School (N - Y8) Behaviour Policies;
- E-Safety Policy and Electronic Device Acceptable Use Agreement;
- Attendance Policy;
- Missing Pupil Policy;
- Special Educational Needs & Disabilities Policy;
- Preparatory School Learning Support Policy;
- Risk Assessment Policy for Pupil Welfare;
- Health and Safety Policy; and
- Adults / Children resident on College Campus.

All related policies can be found on the College's Resource Centre.

All policies which address issues of power and potential harm, for example Anti-Bullying, Positive Handling Policy (including the Use of Reasonable Force and Positive Touch), Rewards and Sanctions, are linked to ensure a whole-College approach.

3. THE ROLE OF THE COUNCIL

The College Council has overall responsibility for all matters which are the subject of this policy and has specific responsibilities as described in Part 2 of KCSIE.

The College Council will ensure that:

- the College has an effective Safeguarding and Protecting Children Policy in accordance with South West Child Protection Procedures and Keeping Bristol Safe Partnership;
- the College operates Safer Recruitment, Selection and Disclosure procedures;
- at least one member of the College's senior leadership team is appointed as the DSL;
- the DSL(s) attends appropriate refresher training every two years;
- the Head of College and all other staff who work with children undertake regular safeguarding training;
- temporary staff, contractors and volunteers are made aware of the College's arrangements for Safeguarding and Child Protection and their responsibilities;
- the College remedies any deficiencies or weaknesses brought to its attention without delay;
- the College has procedures for dealing with allegations of abuse against staff/volunteers;
- the Council reviews this policy annually;
- a member of Council is appointed to chair the Safeguarding and Welfare Committee (Chair of the SWC), with a specific brief for Safeguarding and Child Protection. The Chair of the SWC takes leadership responsibility for the College's safeguarding arrangements and will liaise with the Head of College and DHS;
- the Chair of the SWC will liaise with the Head of College and the DHS to produce an annual report for the Council and complete schools annual safeguarding audit for Keeping Bristol Safe Partnership;

- the Chair of Council is nominated to be responsible for liaising with the Local Authority and other partner agencies in the event of allegations of abuse being made against the Head of College; and
- the role of the Council and of the Chair of the SWC is one of strategy, governance and oversight, and neither the Council nor the Chair of SWC will be involved in concerns about individual pupils (unless the concern involves an allegation against a member of staff or volunteer).

4. TRAINING

i) Induction and Training:

Staff will be provided with induction training, in accordance with Keeping Bristol Safe Partnership (KBSP) that includes:

- this policy;
- the staff Code of Conduct, including the Whistleblowing procedure and the IT Acceptable Use Policy;
- the role of the Deputy Head cross-College Safeguarding and Designated Safeguarding Lead and his/her identity and contact details, together with the details of his/her Deputies;
- information on the different types of abuse (including Peer on Peer Abuse, Prevent, Female Genital Mutilation (FGM) and Children Missing Education (CME));
- read and understand Part 1 of *Keeping Children Safe in Education 2019*, including, where relevant, Annex A; and
- the College's approach to online safety.

ii) Ongoing Safeguarding Training:

- annually, staff will have access to this policy and Part 1 of *Keeping Children Safe in Education 2019*, including Annex A, and will be required to confirm that they have read and understood its content;
- staff members and College Council will undertake appropriate Safeguarding and Child Protection Training which will be updated as required and in line with advice from the Keeping Bristol Safe Partnership. In addition, all staff members will receive safeguarding and child protection updates via EduCare, email, e-bulletins and staff meetings on a regular basis; and
- additionally, the College will make available the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as Peer on Peer Abuse, Cyberbullying, Mental Health, Prevent, Child Sexual Exploitation and Female Genital Mutilation.

iii) Members of Council

- all Members of Council receive both induction and ongoing safeguarding training. The Chair of the SWC and the Chair of Council will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities.

iv) Deputy Head Cross-College Safeguarding and Designated Safeguarding Lead Training:

- the DHS, DSLs and Deputy DSLs will undertake training to provide them with the knowledge and skills required to carry out the role and will be updated at least every two years;
- the DHS, DSLs and Deputy DSL will undertake relevant Prevent awareness training and in turn will provide advice and support to staff on protecting children from the risk of radicalisation;
- online Safety training will be integrated, aligned and considered as part of the overarching safeguarding approach; and
- in addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role.

All training will be carried out in accordance with Keeping Bristol Safe Partnership (KBSP) procedures and comply with the law.

5. CREATING A CULTURE OF SAFEGUARDING

Recruitment, Selection and Disclosure

The school pays full regard to the safer recruitment practices detailed in 'Keeping Children Safe in Education' (2019) including scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining relevant references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking appropriate checks through the Disclosure and Barring Service (DBS), the barred list checks and prohibition checks, dependent on the role and duties performed, including regulated and non-regulated activity (KCSIE 2019). All recruitment materials will include reference to Clifton College commitment to safeguarding and promoting the wellbeing of pupils.

The College maintains a Single Central Record (SCR) of appointments for all staff.

Staff connected to the College's early years and later years provisions are under an ongoing duty to inform the College if their circumstances change which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to the College's Recruitment, Selection and Disclosure policy for further information about this duty and to their contract of employment in respect of their ongoing duty to update the College.

The College's protocol for ensuring that visiting speakers are suitable and appropriately supervised is set out in the College's separate Visiting Speakers Protocol.

Staff Support

It is recognised safeguarding and child protection work can be stressful and traumatic. Clifton College will support staff by providing an opportunity to talk through their anxieties with the Safeguarding Team and to seek further support, as appropriate.

Pupil Support

Opportunities will be provided for pupils to develop skills, attitudes and knowledge that promote their safety and wellbeing. Relevant issues will be supported through the curriculum through age appropriate teaching including: Relationship Education (Preparatory School) and Relationships and Sex Education in (Upper School) and through Personal, Social, Health and Economic (PSHE) education, to explore key areas such as self-esteem, emotional literacy, assertiveness, building resilience to radicalisation, e-safety and anti-bullying.

Whole School Approach

All policies which address issues of power and potential harm, for example anti-bullying, equalities, use of reasonable force, positive behaviour, will be linked to ensure a whole college approach.

The safeguarding policy cannot be separated from the general ethos of the College, which should ensure that pupils are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child.

Identification of those at Increased Risk, or have Additional Safeguarding Needs

Certain groups of pupils within school are more likely to be identified as requiring extra support to meet their safeguarding needs; these could include: children in care, young carers, those living in households where there is domestic abuse, and/or substance misuse, etc. It is therefore important that those at greater risk are identified, regularly monitored and appropriate measures put in place to support their needs.

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school. All staff should be considering the context within which incidents and or behaviours occur, this is known as Contextual Safeguarding.

6. THE ROLE OF THE DEPUTY HEAD CROSS-COLLEGE SAFEGUARDING (DHS)

The role of Deputy Head Cross-College Safeguarding was introduced in August 2019 to oversee the development and delivery of safeguarding to ensure that all cross-cutting issues relating to safeguarding are identified and addressed.

7. THE ROLE OF THE DESIGNATED SAFEGUARDING LEAD (DSL)

The DSL is a senior member of staff of the College's leadership team, who has lead responsibility for Safeguarding and Child Protection (including online safety) within the College. The DSL has the necessary status and authority to take lead responsibility for all aspects of safeguarding and child protection (including online safety) throughout the College.

The DSL has the time, funding, training, resources and support to enable him/her to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and/or to support other staff to do so) and to contribute to the assessment of children. Details of DSLs and Deputy DSLs are available on the College website, newsletters, or the 'If you have concerns about a child...' flowchart posters, which are displayed across the College.

If the DSL is unavailable the activities of the DSL will be carried out by the Deputy DSL. Contact details for the DSLs and Deputy DSLs are set out in Appendix 1.

Whilst the activities of the DSL can be delegated to appropriately trained Deputies, the ultimate lead responsibility for Safeguarding and Child Protection remains with the DSL.

The DSLs will ensure the availability of the DSL (or a Deputy) during term time and College hours as well as outside of term time/College hours for staff in the College to discuss any safeguarding concerns.

A detailed description of the role of the DSL and the required training content is set out in Appendix 4 and *Keeping Children Safe in Education (2019)* – Annex B.

8. WHAT STAFF NEED TO KNOW

All staff need to be aware of the systems within the College which support safeguarding and child protection – this forms part of the induction process but also on-going training which is regularly updated. All staff should:

- know how to contact the DHS, DSL, D/DSLs;
- know how to contact the Chair of Council and the Chair of the SWC;
- read and understand this policy and revisit it annually or when significantly amended;
- read Part 1 and Annex A of *Keeping Children Safe in Education 2019* (or latest version) annually;
- undertake all relevant safeguarding training;

- be aware of the College's procedures in order to identify those pupils in need of Early Help and take appropriate action where there are concerns for the welfare and protection of children and young people;
- adhere to the College's Staff Code of Conduct;
- use of reasonable force:
There are circumstances when it would be appropriate for staff to use reasonable force to safeguard pupils. 'Reasonable' in these circumstances means using no more force than is needed. Staff should refer to the College's Positive Handling Policy and the staff Code of Conduct for more detailed guidance about the use of reasonable force;
- be aware of signs of abuse or neglect (see Section 22 of this policy); and
- be aware that if staff are employed under provisions covered by the Childcare (Disqualification) Regulations 2009 and fall within the scope of Disqualification under the Childcare Act 2006, they must complete a self-declaration form in addition to the enhanced DBS.

9. RESPONDING AND REPORTING CONCERNS ABOUT A PUPIL

Every disclosure or suspicion of abuse from within or outside the College will be taken seriously and action taken in accordance with this policy.

i) Reporting Concerns

If staff have **any concerns** about a pupil's welfare, action should be taken without delay.

The member of staff must report the concern to the **DHS, DSL** or the **DDSL** in the DSL's absence. The contact details of the DHS, DSL and DDSL are set out in the contacts list at the back of this policy.

If the concern involves an allegation against staff, this must be reported in accordance with the procedures set out in Section 10.

Teachers must report known cases of female genital mutilation (FGM) to the police. See Section 13 for further information about FGM and this reporting duty. All other staff should refer FGM concerns to the DSL.

ii) What if the DHS, DSL or DDSL is unavailable?

The DHS, DSL or the Deputy DSL should always be available to discuss safeguarding concerns and may be contacted on their mobile phones in relation to any safeguarding concerns out of College hours.

If in exceptional circumstances the DHS, DSL and Deputy DSL are unavailable, which may occur outside term time or College hours, staff must not delay taking action. Staff should speak to their line manager or a member of the senior leadership team and/or advice should be taken from children's social care. The contact details are set out at the back of this policy.

Where a child is suffering, or is likely to suffer from harm, a referral to Children's Social Care should be made immediately. Staff should be aware of the process for making a referral to Children's Social Care and/or the police in these circumstances. See below for details on making a referral.

Any action should be shared with the DHS, DSL or Deputy DSL, or a member of the senior leadership team, as soon as is practically possible.

Receiving a disclosure and recording a concern

When abuse is disclosed, observed or suspected, staff or volunteers should:

- stay calm. Listen with care, reassurance, seriousness and sincerity and keep an open mind;
- do not take a decision as to whether or not the abuse has taken place;
- do not communicate shock, anger or embarrassment;
- do not interrupt when the child is recalling significant events;
- reassure the child;
- do not ask leading or closed questions. Instead, ask open questions e.g. “How did this make you feel?”;
- take care not to make assumptions about what the pupil is saying and do not make suggestions to the pupil as to an alternative explanation for their concerns;
- do not promise confidentiality to a pupil who makes a disclosure but make clear to the pupil that you will need to pass on their concerns to help keep them safe;
- check that you have correctly understood what the child is trying to tell you. Listen and remember;
- write an accurate and contemporary record of the conversation using the child’s own language. The record should include; the date and time; the place of the conversation; the essence of what was said and done by whom and in whose presence. Do not add opinions or interpretations. The written record of the disclosure should be signed and dated;
- report this information to the DSL and record on Child Protection Online Monitoring System (CPOMS). The procedure, guidance and instructions for using CPOMS can be found on the Safeguarding pages of the Clifton College Resource Centre;
- all evidence, for example, notes, mobile phones containing text messages, clothing, computers, must be safeguarded, preserved and passed to the DSL or uploaded onto CPOMS as appropriate;
- all suspicions or complaints of abuse must be reported to the College DSL, or a Deputy DSL, as soon as possible, so that it may be reported to First Response within 24 hours, unless the allegation is against a member of staff (see the procedures set out in Section 10 - Dealing with Allegations against Staff, the Head, Members of Council or Volunteers); and
- under no circumstances should staff seek to investigate the claims further themselves.

Receiving a report of harmful sexual behaviour

Additional guidance about how to manage a report of harmful sexual behaviour is provided in Part 5 KCSIE. This includes the following advice:

- only record the facts as the child presents them;
- where the report includes an online element, do not view or forward illegal images of a child. See the UK Council for Child Internet Safety's advice note *Sexting in schools and colleges: responding to incidents and safeguarding young people* for advice about what to do when viewing an image is unavoidable; and
- manage reports with another member of staff present (preferably the DSL or DDSL), if possible.

“Inform the DSL as soon as practically possible if the DSL is not involved in the initial report”.

Staff may find it helpful to remember the ‘5 R’s’ -

Recognise → Respond → Reassure → Refer → Record

Immediately after an allegation/disclosure is made, the DSL will:

- obtain written details of the allegation, signed and dated, from the person who received the allegation;
- record any information about times, dates, locations and names of potential witnesses; and
- where appropriate, talk to the child concerned.

iii) Action by the DSL

On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the Keeping Bristol Safe Partnership procedures and Bristol Multi-Agency Threshold Guidance. Such action may include:

- managing any support for the pupil internally via the College's own pastoral support processes, seeking advice from Children's Social Care where required;
- an early help assessment, by the College or external agencies; or
- a referral for statutory services.

The views of the child will be taken into account when considering the appropriate course of action but will not be determinative.

Where the concern relates to the welfare of a pupil who is aged 18 years or over, the DSL will consider whether it is necessary to refer such concerns to Adult Social Care rather than, or in addition to, Children's Social Care.

If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving.

iv) Managing Support for Pupils internally

The College has a framework for the identification, assessment, management and review of risk to pupil welfare so that appropriate action can be taken to reduce the risks identified. See Section 26 for the College's record keeping procedures and the College's Risk Assessment Policy for Pupil Welfare.

Pupils are advised as to whom they can turn if they need help; for example, House staff, trained counsellors, the Independent Listener, the College Chaplain, medical staff and external agencies.

v) Early Help

Early Help means providing support as soon as a need for a child emerges at any point in a child's life. The College understands that providing Early Help is more effective in promoting the welfare of children than reacting later.

The College's safeguarding training includes awareness and the importance of implementing Early Help. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges. 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 showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care; home or education;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- is misusing drugs or alcohol themselves;
- is looked after or has returned home to their family from care; or
- is a privately fostered child.

A member of staff who considers that a pupil may benefit from Early Help should in the first instance discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the Bristol Multi Agency Threshold Guidance and will support staff in liaising with other agencies and setting up an inter-agency assessment as appropriate.

If Early Help is appropriate, staff may be required to support other agencies and professionals in an early help assessment and will be supported by the DSL and carrying out this role. In some cases staff may be required to take a lead role.

The matter will be kept under review and consideration given to a referral to Children's Social Care for assessment for statutory services if the pupil's situation appears to be getting worse, or does not appear to be improving.

vi) Making a referral

Where a child is suffering, or is likely to suffer from harm, a referral to Children's Social Care (and if appropriate the police: 999) should be made without delay. The contact details for Children's Social Care are set out at the back of this policy.

Children's Social Care may undertake a statutory assessment under the Children Act 1989 into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:

- **children in need:** A child in need is 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. Children in need may be assessed under section 17 of the Children Act 1989; and
- **children suffering or likely to suffer significant harm:** Local authorities have a duty to make enquiries 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.

Staff required to make a direct referral may find helpful the flowchart set out on page 13 of KCSIE and the flowcharts set out in Chapter 1 of Working Together to Safeguard Children for information about the likely actions and decisions required.

Staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:

- personal details of the child including the child's developmental needs;
- detailed information about the concern; and
- information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.

If the referral is made by telephone, this should be followed up in writing without delay.

Anyone can make a referral. Where referrals are not made by the DSL, they should be informed, as soon as possible that a referral has been made.

Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority. If this is not received, the DSL (or the person that made the referral) should contact Children's Social Care again.

Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure that the concerns have been

addressed and that the child's situation improves. Details of the KBSP escalation procedure can be found here: –

<https://bristolsafeguarding.org/media/27294/revised-escalation-procedure-230418.pdf>

vii) Involving Parents and Carers:

In general, the DSL will discuss any child protection concerns with parents/carers before approaching other agencies. However, there may be occasions when the College will consult the Head, the Designated Officer (previously LADO), Children's Social Care, the police and/or the pupil before informing parents/carers, because it considers that contacting them may increase the risk of significant harm to the child. In all cases, the DSL will be guided by the Bristol Multi Agency Threshold Guidance.

viii) Multi Agency Working:

Staff work in partnership with other agencies in the best interests of the children. If there are Child Protection concerns, referrals should be made by the DSL, or Deputy DSL to First Response by phone (0117 903 6444); in less urgent cases, the DSL should use the web form to contact First Response. Where the child already has a social worker, the request for service should go immediately to the social worker involved or, in their absence, to their team manager.

Clifton College will cooperate with any child protection enquiries conducted by Children's Social Care: the College will ensure representation at appropriate inter-agency meetings such as integrated support plan meetings, initial and review child protection conferences and core group meetings.

Where a pupil is subject to an inter-agency child protection plan or a Multi-Agency Risk Assessment Conference (MARAC) meeting, the College will contribute to the preparation, implementation and review of the plan as appropriate.

In situations where a child in care may be put on to revised timetable, the College will consult with the Hope Virtual School and complete the pro-forma found at -

<https://www.bristol.gov.uk/schools-learning-early-years/resources-professionals/attendance-and-exclusions>

ix) Exclusions:

When the College is considering excluding, either fixed term or permanently, a vulnerable pupil and/or a pupil who is the subject of a child protection plan, or where there is an existing child protection file, the College will call a multi-agency risk-assessment meeting prior to making the decision to exclude. In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment must be completed and the Chair of Council and Chair of Safeguarding and Welfare Committee will be informed.

x) All Staff are Particularly Reminded that:

Detailed guidance is given to staff and volunteers to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in the Staff Code of Conduct which is available both in the College's Employment Manual and on the College Resource Centre. It includes details of additional safeguarding arrangements, where staff engage in one-to-one teaching and meetings with pupils.

Staff and volunteers should also feel able to follow the College's separate Whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices at the College, potential failures by the College or its staff to safeguard the welfare of pupils. Staff or volunteers should also feel able to follow the College's Whistleblowing Policy to raise concerns about other wrongdoing in the workplace that does not involve the safeguarding and welfare of children. The NSPCC whistleblowing helpline is available <https://www.gov.uk/whistleblowing> for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 Monday - Friday 8:00am to 8:00pm or email: help@nspcc.org.uk

xi) Additional reporting

In addition to the reporting requirements explained above, the College will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:

Health and Safety Executive

The College is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the College's Health and Safety Policy.

Charity Commission

The College is a registered charity and is required to report all serious incidents to the Charity Commission in accordance with the guidance *How to report a serious incident in your charity* (Charity Commission, September 2017).

Serious incidents that will be reported to the Charity Commission include suspicions, allegations or incidents of abuse involving pupils. This is likely to involve the following:

- pupils have been, or are alleged to have been, abused or mistreated while under the care of the College or by someone connected with the College, for example a Member of Council, a staff member or volunteer;
- there has been an incident involving the abuse or mistreatment (alleged or actual) of someone and this is connected with the activities of the College; or
- there has been a breach of the College's procedures or policies which has put pupils at risk, including failure to carry out checks which would have identified that a person is disqualified in law, under safeguarding legislation, from working with children.

The College will notify the Charity Commission of other agencies to which the incident has been reported in accordance with this policy.

Insurers

The College will consider whether it is necessary to report a safeguarding incident to the relevant insurers and/or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.

Care should be taken to ensure this is done before renewal to ensure that the College complies with its duties under the Insurance Act 2015. If the College is in any doubt with regard to the correct insurer and/or policy and/or if it is unable to locate the relevant insurer, professional advice should be sought.

10. MANAGING ALLEGATIONS AGAINST STAFF, THE HEAD OF COLLEGE, MEMBERS OF COUNCIL OR VOLUNTEERS

The procedures in this policy apply to staff and volunteers who may pose a risk of harm to children and outlines its responsibilities to protect children from abuse and the College's duty of care to employees, in particular how the College will provide effective support for anyone subject of an allegation including a named contact if they should be suspended. These procedures are set out below and follow Part 4 of KCSIE.

The College will follow its employment procedures for dealing with any other concern raised about staff, involving external agencies as appropriate.

Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of the College in relation to contact with pupils, parents, colleagues and any other person who comes into contact with the College. This guidance is contained in the Code of Conduct and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.

Managing Allegations

The College's procedures for managing allegations made against staff will be used where the member of staff, the Head of College, member of Council or volunteer has:

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

Any allegations meeting one of the above criteria will be dealt with in accordance with the Keeping Bristol Safe Partnership procedures. Advice from the Designated Officer (LADO), will be sought in borderline cases. The Designated Officer's role is to provide advice and guidance, liaise with the Police and other agencies, if involved, and monitor the progress

of cases to ensure they are dealt with as quickly as possible, consistent with a thorough and fair process. All such allegations must be dealt with as a priority without delay.

Allegations against a teacher who is no longer teaching, historical allegations, including allegations relating to former pupils and all allegations where a criminal offence may have been committed will be referred to the Police.

Reporting an allegation

Where an allegation or complaint is made against any current member of staff (other than the Head of College), including the DSL, the matter should be reported immediately to the Head of College. The Head of College will consult with the Designated Officer before further action is taken. Where appropriate, the Head of College will consult with the DSL.

If the allegation relates to the Head of College then this should be reported to the Chair of Council or the Chair of the SWC (without first informing the Head of College). The Chair of Council will then liaise with the Designated Officer to decide before a decision is made on any further action required.

The Designated Officer must be informed immediately and in any event within one working day of all allegations that come to the College's attention and appear to meet the criteria at the beginning of this section.

Where an allegation is made against any Member of Council, the matter should be reported immediately to the Chair of Council or the Chair of the SWC. If either the Chair of Council or the Chair of the SWC are the subject of an allegation, the matter should be reported to the other. The allegation will be discussed immediately with the Designated Officer before further action is taken. Where appropriate, the Chair of Council will consult the Chair of the SWC, and vice versa.

If it is not possible to report to the Head or Chair of Council or Chair of the SWC in the circumstances set out above, a report should be made immediately to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the Head or, where appropriate, the Chair of Council and the Chair of the SWC.

The person taking action in accordance with the procedures is known as the Case Manager.

Disclosure of information

The Case Manager will inform the accused person of the allegation as soon as possible after the Designated Officer has been consulted.

The parents or carers of the child/children involved will be informed of the allegation as soon as possible if they do not already know of it. They may also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws of confidence and data protection and the advice of external agencies.

Where the Designated Officer advises that a strategy discussion is needed, or the police or Children's Social Care need to be involved, the Case Manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

Further action to be taken by the College

The College has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The College will take action in accordance with Part Four of *Keeping Children Safe in Education 2019* and the College's employment procedures.

Suspension will not be an automatic response to an allegation. The Designated Officer will be consulted as to the appropriate action to take and full consideration will be given to all the options, subject to the need to ensure:

- the safety and welfare of the pupil or pupils concerned; and
- the need for a full and fair investigation.

If a member of boarding staff is suspended pending an investigation, arrangements will be made for alternative accommodation away from children.

All investigations will be conducted in accordance with the guidance of the relevant external agencies as speedily as possible without compromising thoroughness. Arrangements will be made for the member of staff or representative to be contacted regularly with information on progress.

i) Ceasing to use staff:

If the College ceases to use the services of a member of staff or volunteer because they may indicate they would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity, a settlement/compromise agreement will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met. Any such incidents will be followed by a review of the safeguarding procedures within the College, with a report being presented to the Council without delay. The College may also need to consider a referral to the DBS if a member of staff is suspended, or deployed to another area of work that is not a regulated activity.

If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services, any allegations will still be followed up by the College in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible if the criteria are met.

Where a teacher has been dismissed, or would have been dismissed had he/she not resigned, separate consideration will be given as to whether a referral to the Teaching Regulation Agency (TRA) should be made.

ii) Unsubstantiated, false or malicious allegations:

Where an allegation by a pupil is found to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the College's behaviour and discipline policies. Where a parent has made a deliberately invented or malicious allegation the Head will consider whether to require that parent to withdraw their child or children from the College on the basis that they have treated the College or a member of staff unreasonably.

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the College reserves the right to contact the Police to determine whether any action might be appropriate.

iii) Record keeping:

Details of allegations found to be malicious will be removed from personnel records.

For all other allegations, full details will be recorded on the confidential personnel file of the person accused. An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references. In accordance with *Keeping Children Safe in Education 2019*, a history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

The College will retain all safeguarding records and relevant personnel records for so long as reasonably required¹.

Staff can find further information on the investigation and disciplinary process in the College's Employment Manual which is available on the Resource Centre.

11. PEER ON PEER ABUSE (INCLUDING SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN)

The conduct of pupils towards each other will, in most instances, be covered by the College's Behaviour Policies. However, some behaviour by a pupil towards another may be of such a nature that safeguarding concerns are raised.

Peer on peer abuse rarely takes place in isolation and can often indicate wider safeguarding concerns that are linked to other things that are happening in a child's life and/or the spaces in which they spend their time. This is known as contextual

¹ In accordance with the terms of reference of the Independent Inquiry into Child Sexual Abuse all Schools are required to retain information which relates to allegations (substantiated or not) of organisations and individuals who may have been involved in, or have knowledge of child sexual abuse or child sexual exploitation; allegations (substantiated or not) of individuals having engaged in sexual activity with, or having a sexual interest in, children; institutional failures to protect children from sexual abuse or other exploitation.

safeguarding, which simply means that assessments of children should consider whether wider environmental factors are present in a child's life that may be a threat to their safety and/or welfare. All staff, but especially the DHS, DSL or Deputy DSL should be considering the context within which such incidents and/or behaviours occur. Research has also shown that many children who present with harmful behaviour towards others, in the context of peer on peer abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers. Children's Social Care should be informed of all such information to allow any assessment process to consider all the available evidence and the full context of any abuse.

Peer on peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). Peer on peer abuse can take various forms, including (but not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

References to **sexual violence** are references to sexual offences under the Sexual Offences Act 2003, specifically rape, assault by penetration and sexual assault. References to **sexual harassment** mean "unwanted conduct of a sexual nature" that can occur online and offline. In the context of child on child sexual harassment, it 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.

Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment. The College recognises that problematic, abusive and violent sexual behaviours are inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online and offline (both physical and verbal) and the College recognises the gendered nature such behaviour can take. Harmful sexual behaviour, like all peer on peer abuse, is never acceptable and will be taken seriously.

The DfE guidance *Sexual violence and sexual harassment between children in schools and colleges* provides further detailed advice.

Clifton College takes allegations of peer on peer abuse very seriously; abuse in all situations is unacceptable and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". Behaviour such as initiation violence or any form of sexual violence or sexual harassment is not acceptable.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. All incidents will be taken seriously by the College and those affected will be offered appropriate support. Staff should be aware that some groups of individuals are potentially more at risk of peer on peer sexual violence –

for example evidence shows that girls, children with SEND and LGBTQ+ children are at greater risk.

All staff should be alert to the well-being of pupils and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by peer on peer abuse. Signs that a child may be suffering from peer on peer abuse can also overlap with those indicating other forms of abuse. Any child can be vulnerable to peer on peer abuse due to the strength of peer influence during adolescence.

i) Minimising the risk of Peer on Peer abuse

Clifton College actively seeks to raise awareness of and prevent all forms of peer on peer abuse by:

- educating children about the nature and prevalence of peer-on-peer abuse via PSHE and the wider curriculum;
- having robust anti-bullying procedures in place (see also the College's Anti-bullying Policy) and pupils are taught at all stages of the College about acceptable behaviour and how to keep themselves safe;
- encouraging staff and volunteers that all peer on peer abuse issues are reported as safeguarding concerns in accordance with the procedures in this policy to enable the DSL to spot and address any concerning trends and identify pupils who may need additional support;
- challenging the attitudes that underlie such abuse (both inside and outside the classroom);
- working with members of Council, Senior Leadership Team, all staff and volunteers, pupils and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the College community;
- creating conditions in which pupils can aspire to and realise safe and healthy relationships;
- creating a culture in which pupils feel able to share their concerns openly, in a non-judgmental environment, and have them listened to. The Preparatory School diary contains details of what a pupil should do if they have a complaint; and
- responding to cases of peer-on-peer abuse promptly and appropriately.

ii) How Allegations of Peer on Peer are Recorded, Investigated and Dealt With:

It is essential that all concerns/allegations of peer on peer abuse, including sexual violence or sexual harassment between children, are handled sensitively, appropriately and promptly. If a member of staff thinks, for whatever reason, that a child may be at risk of abuse by their peer(s), they should discuss their concerns with the DSL without delay so that a course of action can be agreed.

The DSL will, where necessary, take immediate steps to ensure the safety of the child/children affected, in line with the advice for practitioners in: *What to do if you're worried that a child is being abused* (March 2015). The DSL will use their professional judgement to determine whether it is appropriate for the alleged behaviour to be dealt with internally, or whether any external specialist support is required. In borderline cases

the DSL may wish to consult with First Response and/or any other external agencies on a no-names basis to determine the most appropriate response.

Where there is an allegation or a concern of peer on peer abuse, the College will carry out a robust risk and needs assessment in respect of each child affected by the abuse. This may range from an unwritten 'dynamic' assessment to a detailed written assessment depending on the severity of the case. Please see Section 24 and the College's policy on risk assessments for pupil welfare.

In cases where the DSL deems it appropriate to contact First Response, they will discuss the allegations/concerns with them and agree on a course of action, which may include:

- managing the incident internally with help from external specialists where appropriate and possible;
- undertaking/contributing to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child/children and their family;
- referring the child/children to Children's Social Care for assessment; or
- reporting alleged criminal behaviour to the Police.

All concerns/allegations of peer on peer abuse will be assessed on a case by case basis, and in light of the wider context.

Staff involved with cases of peer on peer abuse should ensure that they keep accurate records of all related conversations, meetings, communications, discussions, decisions and outcomes on CPOMS.

iii) Support for those Affected by Peer on Peer Abuse:

Support for those involved in cases of peer on peer abuse will consider their age, the nature of the allegations and the risk of further abuse. The College must ensure that all those involved are safeguarded, providing pupils with education and support as necessary. The views of the child/children affected should also be taken into account.

Unless it is unsafe to do so (for example where a referral needs to be made immediately), the DSL should discuss proposed action with the child/children involved and their parents, as well as obtaining consent to any referral before it is made. The College should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the College will ensure that, subject to the advice of First Response, the pupil's parents are informed as soon as possible and the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, their guardian will be requested to provide support and to accommodate the pupil should it be necessary during the investigation.

Normally the DSL will try to discuss any concerns about a child's welfare with the family, and where possible seek their agreement to make a referral. However, in accordance with DfE guidance, this will only be done when this will not place the child at increased risk. The child's views will also be taken into account. Where there are doubts or reservations about involving the child's family, the DSL should clarify with First Response or the Police whether, and if so when and whom, the parents should be told about the referral. This is important in cases where the Police may need to conduct a criminal investigation.

It is important for Clifton College to ensure that any pupils involved with an allegation of peer on peer abuse remain protected, especially from bullying or harassment. Clifton College will support all pupils involved in accordance with the advice of the relevant agencies.

iv) Sexting

Staff should be aware of the dangers posed to children and young people in relation to 'sexting' and 'youth produced sexual imagery'. These terms refer to messages, photos and videos of a sexual nature created by children or young people which can be shared via mobile phones, webcams over the internet and social media.

The College treats all incidences of sexting as safeguarding matters to be actioned in accordance with this policy.

Members of staff should not view sexual imagery which is reported to them, or copy, print or share the images under any circumstances. In referring any incident of sexting, members of staff should describe the content of the images as reported to them.

Staff should report any concerns regarding sexting and youth produced sexual imagery immediately to the DSL. Staff should also be alert to the fact that children with SEN and Disabilities (SEND) can face additional risks online, for example, from online bullying, grooming and radicalisation.

The DSL may in exceptional circumstances view images with the prior approval of the Head of College and only where:

- it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;
- it is necessary to report the image to a website or agency to have it taken down; or
- a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable.

Where viewing an image is unavoidable:

- viewing should take place on School premises wherever possible;
- the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);
- a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;

- full details of the viewing must be recorded in the College's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it; and
- any member of staff who views an indecent image should be given appropriate support.

If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be locked away securely until they are required.

If an electronic device that is prohibited by the College rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

If external agencies do not need to be involved, the College must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.

If images have been shared online and cannot now be deleted by the person who shared them, the College should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).

Where a pupil receives unwanted images, the College should advise the pupil and his/her parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address.

For further information of support agencies and further information on how to respond to incidents of sexting, staff can refer to UKCCIS Guidance, *Sexting in Schools and Colleges* -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf

The College of Policing has also produced a briefing note *Police action in response to youth produced sexual imagery ("sexting")* (November 2016) which provides information on how police forces treat instances of sexting by young persons.

12. CHILDREN MISSING 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 report any prolonged or suspicious absences to the DSL/Deputy Head Pastoral as soon as possible.

Where reasonably possible the College will hold more than one emergency contact for each pupil.

The College shall inform the local authority of any pupil who is going to be added to or deleted from the College's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended).

Clifton College will inform the local authority of any pupil who fails to attend College regularly, or has been absent without the College's permission for a continuous period of 10 College days or more, at such intervals as are agreed between the College and the Local Authority (or in default of such agreement, at intervals determined by the Secretary of State).

Staff should refer to the College's Attendance Policy for further guidance on unauthorised absence and children missing education procedures, or see the Education Welfare Service, Bristol City Council website for more details about local procedures: -

<https://www.bristol.gov.uk/schools-learning-early-years/education-welfare>

13. FEMALE GENITAL MUTILATION (FGM)

Whilst all staff should speak to the Designated Safeguarding Lead (or Deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal** duty on **teachers**. If a **teacher**, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18 years, the teacher **must** report this to the police (KCSIE 2019).

Regulated professionals have a [mandatory reporting duty](#) to report cases of known FGM. Teachers are considered regulated professionals. The duty requires that they themselves report known incidents to the police via 101. This cannot be delegated to the Designated Safeguarding Lead. For further information about preventing and responding to incidents of FGM, KBSP have issued [FGM Safeguarding Guidance 2017-2020](#) .

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the College's DSL (or Deputy DSL) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 years or over. In these cases, teachers should follow local safeguarding procedures.

14. PREVENT

Radicalisation and the Prevent Duty:

The College has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.

The College aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. The College is committed to providing a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

The College has adopted the Government's definitions for the purposes of compliance with the Prevent duty:

- **Extremism:** 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;
- **Radicalisation:** the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views.

College staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

Channel Duty Guidance:

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

Protecting vulnerable people from being drawn into terrorism (2015) notes that "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."

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;
- day-to-day 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, group or cause;
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups); and
- attempts to recruit others to the group/cause/ideology; or communications with others that suggest identification with a group/cause/ideology.

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

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- using insulting or derogatory names or labels for another group;
- speaking about 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; and
- condoning or supporting violence or harm towards others, or plotting or conspiring with others.

Protecting children from the risk of radicalisation is part of the College's wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

Staff should report any concerns immediately to the Deputy Head Cross-College Safeguarding or Designated Safeguarding Lead or call 101 (999 if the child is at immediate risk of harm).

For advice and guidance in making a referral, or about a pupil who is causing concern, staff can contact the Avon and Somerset Police Prevent Team on 0117 945 5536/9 or dial 101 (and ask for the 'Prevent Team'. Staff should explain that they are calling about extremism or radicalisation). Or staff can email channelSW@avonandsomerset.pnn.police.uk

A dedicated DfE telephone helpline and mailbox is also available for non-emergency advice for staff and Members of Council: 0207 340 7264 and counter.extremism@education.gov.uk

The DfE and Home Office's briefing note *The use of social media for online radicalisation* (July 2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

For further guidance the College may also wish to make use of the UK Safer Internet Centre (Telephone number: 0344 7340 7264 and email: helpline@saferinternet.org.uk).

15. E-SAFETY AND THE USE OF MOBILE TECHNOLOGY

Clifton College is increasingly working online, therefore is essential that pupils are safeguarded from potentially harmful and inappropriate online material. The use of mobile technology has become a significant component of many safeguarding issues and often provides the platform that facilitates harm.

The College has separate Acceptable Use policies for pupils which set out the expectations for those in Years 1 to 13. In the EYFS setting, pupils and adults are not permitted to bring mobile phones or any mobile device with a camera facility onto the premises.

All staff (including staff in the EYFS setting) should use mobile devices and cameras in accordance with the guidance set out in the staff Code of Conduct. Staff must not use College property or the College network to access or allow access to inappropriate online material. All staff using the Clifton College network are required to sign the IT Acceptable Use Policy (staff) which can be found on the Resource Centre. The Code of Conduct provides further information on the use of technology, as well as appropriate, safe and responsible online behaviours.

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

The College has an *E-Safety Policy for Pupils and Parents* which provides more information on the College's approach to online safety and also details the measures in place to limit children and young people's exposure to risk online.

Filtering and blocking: The Clifton College computer system provides facilities for Internet access by both pupils and staff; access to the system is subject to acceptance of the College's policies regarding acceptable use. As part of the College's commitment to safeguarding, Internet access from the system is filtered through a leading digital safeguarding solution from Smoothwall. Smoothwall's system is configured to generate daily reports of access to websites considered inappropriate in terms of safeguarding; such inappropriate websites might contain data and images related to a range of targeted subjects. Reports undergo daily review as an integral part of the College's safeguarding practice. Should a review highlight any seeming attempt of Internet access that may be concerning it is immediately, and formally, raised with adherence to the College's safeguarding policy and practice which encompasses both pupils and staff.

16. PRIVATE FOSTERING

Private fostering is an arrangement by a child's parents for their child (under 16 years or 18 years if disabled) to be cared for by another adult who is not closely related and is not a legal guardian with parental responsibility for 28 days or more. It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister, uncle or aunt.

The Law requires that carers and parents must notify the children's services department of any private fostering arrangement. If a member of staff becomes aware of a private fostering arrangement they should raise this, in the first instance, with the DSL. The College will then notify the local authority of the circumstances, via First Response. Once notified, the local authority will check that the arrangement is suitable and safe for the child.

17. PUPIL SUPPORT

Pupils are advised as to whom they can turn if they need help; for example, staff and pupil support, trained counsellors, the Independent Listener, the College Chaplain, medical staff and outside agencies.

Opportunities will be provided for pupils to develop skills, concepts, attitudes and knowledge that promote their safety and wellbeing. Relevant issues will be supported through the curriculum, specifically in PSHE, to explore key areas such as self-esteem, emotional literacy, assertiveness, power, sex and relationship education, e-safety and bullying.

18. SHARING OF INFORMATION

The College will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The College will always act in order to safeguard and promote the welfare of others.

The College understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety of pupils, which is always the College's paramount concern. The College understands that the GDPR and Data Protection Act 2018 provide a framework to ensure that personal information is shared appropriately.

The College will cooperate with children's social care, and where appropriate the police, to ensure that all relevant information is shared for the purposes of early help assessments, and assessments and child protection investigations under the Children Act 1989.

Where allegations have been made against staff, the College will consult with the Designated Officer and, where appropriate, the police and Children's Social Care to agree the information that should be disclosed and to whom.

While the College will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

19. SAFEGUARDING CHILDREN IN THE EARLY YEARS FOUNDATION STAGE (EYFS)

All children at Clifton College EYFS have the right to be safe and be treated with dignity, respect and privacy at all times so as to enable them to access all aspects of the College EYFS. This policy supports the safeguarding and welfare requirements of the Early Years Foundation Stage (EYFS) 2017 and the Equality Act 2010.

Clifton College will ensure that:

- no child's physical, mental or sensory impairment will have an adverse effect on their ability to take part in day to day activities;
- no child with a named condition that affects personal development will be discriminated against;
- no child will be sent home or have to wait for their parents/carers due to incontinence; and
- adjustments will be made for any child who has delayed continence.

i) Toileting and Intimate Care:

This policy aims to manage risks associated with toileting and intimate care needs and ensures that employees do not work outside the remit of their responsibilities set out below.

Young children or children with special needs or disabilities may occasionally need intimate care. In providing intimate care, staff must follow these guidelines, should record each incident and report it to a senior member of staff.

Intimate care tasks refers to any task that involves the dressing and undressing, washing including intimate parts, helping a child to use the toilet, changing nappies or carrying out a procedure that requires direct or indirect contact to an intimate personal area, e.g. administering prescribed medication. Staff will only provide personal intimate care in an emergency, or if it is part of their professional role.

- **Toileting:** most school age children should be able to use the toilet independently. Staff might need to supervise the youngest initially and to encourage hand washing. However, if a child appears to require more assistance than usual, this should be reported to the parent so that more independence can be encouraged or medical investigations undertaken;
- **"Accidents":** children should be treated with sensitivity and an appropriate amount of privacy. They should be encouraged to carry out as much as possible of the cleaning operation themselves. Parents should be informed of what has

happened discreetly. If an individual child regularly suffers such accidents, this should be discussed with parents who may need to seek further advice;

- **Off-site visits:** when planning off-site visits, provision should be made for dealing with possible accidents of this nature. The party leader should carry spare clothing, cleansing tissues etc. Except in an emergency, parents or other volunteers should not be asked to carry out intimate care.

ii) Partnership with Parents/Carers:

Staff at Clifton College EYFS work in partnership with parents/carers to provide care appropriate to the needs of the individual child and in discussion with parents and appropriate professionals will produce a care plan. The care plan will set out:

- what care is required;
- number of staff needed to carry out the task (if more than one person is required, the reason will be documented);
- additional equipment required;
- child's preferred means of communication (e.g. visual, verbal). Agree terminology for parts of the body and bodily functions;
- child's level of ability i.e. what tasks they are able to do by themselves;
- acknowledge and respect for any cultural or religious sensitivities related to aspects of intimate care; and
- be regularly monitored and reviewed in accordance with the child's development.

Parents/Carers are asked to supply spare clothes, including underwear, if necessary.

iii) Best Practice:

When intimate care is given, the member of staff explains fully each task that is carried out, and the reason for it. Staff encourage children to do as much for themselves as they can, lots of praise and encouragement will be given to the child when they achieve.

All staff working in early years setting must have a DBS check. Specific staff members are identified to change a child with known needs and they plan and record their work with that child.

iv) Dealing with body fluids:

Urine, faeces, blood and vomit will be cleaned up immediately and disposed of safely by double bagging and disposing in the bins provided. When dealing with body fluids, staff wear protective clothing (disposable plastic gloves and aprons) and wash themselves thoroughly afterward. Soiled children's clothing will be bagged to go home by Clifton College EYFS staff – staff will not rinse it. Children will be kept away from the affected area until the incident has been completely dealt with.

All staff maintain high standards of personal hygiene, and will take all practicable steps to prevent and control the spread of infection.

v) Use of Mobile Devices in the EYFS:

The development of mobile technology means that devices can now be used to effectively record and track children's learning.

Clifton College staff will ensure that only College devices will be used to take photographs or videos of children. All of these devices will be password protected. All parents will be asked to give consent to using photos.

Personal mobiles, cameras or video recorders cannot be used to record classroom activities. Only College property can be used for this. Photographs and recordings can only be transferred to, and stored on a College computer to be printed.

All staff will be made aware of any children who should not appear in photos due to parental consent being withheld or other safeguarding issues

Photographs and recordings can only be transferred to, and stored on a College computer to be printed. Staff will only download data or photographs onto College computers. Parents are advised that this is a no mobile phone site.

20. ABUSE AND NEGLECT

Abuse and neglect is defined as 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. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

All College staff should be aware of Part 1 of KCSIE defines the following indicators of abuse and neglect, ***however, and 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.

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| Neglect: | Sexual Abuse: |
| <p>The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.</p> | <p>Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex), or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.</p> <p>The sexual abuse of children by other children is a specific safeguarding issue in education.</p> |
| Emotional Abuse: | Physical Abuse: |
| <p>The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as</p> | <p>A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.</p> |

overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

21. HISTORIC ABUSE

There may be occasions when a child or adult discloses abuse which occurred in the past. This 'historical abuse' must be treated in exactly the same way as a disclosure or suspicion of current child abuse; the abuser may still represent a risk to children now.

22. WHAT STAFF SHOULD LOOK OUT FOR

Possible warning signs and symptoms of child abuse and neglect can vary from child to child.

Indicators of abuse include, but are not limited to:

- children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- children with consistently poor hygiene;
- children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- children who talk about being left home alone, with inappropriate carers or with strangers;
- children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- children who are regularly missing from school or education;
- children who shy away from being touched or flinch at sudden movements; and
- children who are reluctant to go home after school.

Looked after children and previously looked after children

The College ensures that staff have the skills, knowledge and understanding to keep looked after children and previously looked after children safe and have the information they need in relation to a child's looked after legal status, for example:

- whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order;
- contact arrangements with birth parents or those with parental responsibility; and
- information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

The DSL maintains these details, including contact details of the child's social worker and the Virtual School Head in the local authority that looks after the child.

The DSL will coordinate the Personal Education Plan (PEP) which sets out the child's progress, identifies their strengths and needs and sets individualised learning targets and represents an opportunity to capture pupils' views and aspirations.

Care leavers

The DSL maintains details of the local authority personal advisor appointed to guide and support care leavers (children who have left care and are the subject of a pathway plan) and liaises with them as necessary regarding any issues of concern

Special educational needs and disabilities (SEND)

Staff should also be alert to the fact that children with Special Educational Needs and Disabilities (SEND) can face additional safeguarding challenges and further barriers can exist when recognising abuse and neglect in this group of children. These 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;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Keeping Bristol Safe Partnership can provide advice on the signs of abuse and the DfE advice - *What to do if you're worried a child is being abused (March 2015)* provides further guidance in identifying child abuse. The NSPCC website also provides useful additional information on abuse and neglect and what to look out for.

23. KEY SAFEGUARDING AREAS

In addition to the above (Peer on Peer, Children Missing Education, FGM, Prevent, E-Safety, Private Fostering), there are other areas of safeguarding that the College has a responsibility to address.

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| Attendance: | Bullying: |
| <p>For a pupil to reach their full educational potential a high level of College attendance is essential. Clifton College will monitor all pupils' attendance through a daily register.</p> <p>Clifton College will liaise with the Local Authority in relation to any pupils who are regularly absent from College, or have missed 10 College days or more without permission. Clifton College will also notify the Local Authority if a pupil is to be deleted from the admission register in certain circumstances. For further information staff should refer to the cross-College <i>Attendance Policy</i> which is located on the Resource Centre.</p> | <p>Clifton College does not tolerate any form of bullying against pupils or staff. Clifton College aims to provide an environment in which staff and pupils feel happy and safe. Staff at Clifton College should be aware that all types of bullying, including cyberbullying should never be dismissed as "banter" or "part of growing up".</p> <p>Clifton College has separate <i>Anti-Bullying</i> policies which are accessible to all staff on the Resource Centre. All concerns about bullying should be reported to the DSL as soon as possible.</p> |
| Child and Adolescent Mental Health: | Children and the Court System: |
| <p>Good mental health and resilience are fundamental to pupils' physical health, relationships, education and to achieving their full potential. Clifton College strives to offer the very highest levels of pastoral care to all pupils at all times and has a number of strategies and resources in place to support pupils who experience mental health difficulties.</p> <p>Staff members should report any concerns about a pupil's Mental Health to the DSL (or a Deputy DSL). Each school has an individual Pastoral Care policy which details some of the support available to pupils. Staff can access these policies through the Clifton College Resource Centre.</p> | <p>Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.</p> <p>Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children.</p> <p>The Ministry of Justice and HM Courts & Tribunals Service have published resources to help support staff, parents and pupils. For further details please see Annex A of <i>Keeping Children Safe in Education 2019</i>.</p> |
| Child Criminal Exploitation: County Lines: | Children with Family Members in Prison: |
| <p>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</p> | <p>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. Staff at Clifton College</p> |

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| <p>people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.</p> <p>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.</p> <p>Staff should report any concerns to the DSL.</p> | <p>should be aware of this and families should not be judged or discriminated against because someone is in prison.</p> <p>NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children – https://www.nicco.org.uk/</p> |
| <p>Domestic Abuse:</p> | <p>Drugs:</p> |
| <p>The cross-government definition of domestic violence and abuse is:</p> <p>“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.”</p> <p>The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional</p> <p>Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. Staff should discuss all concerns with the DSL.</p> | <p>Involvement with drugs can be damaging to health, even life-threatening, and the College wishes to deter all pupils from becoming involved in any aspect of substance abuse.</p> <p>As part of the College's duty to promote pupils' well-being, the College has a role to play in preventing drug misuse and providing information, advice and support to pupils via the curriculum.</p> <p>Any member of staff who has concerns over the welfare of pupils which he/she considers could possibly come from involvement with illegal drugs should report their concerns as soon as possible.</p> <p>For further information should refer to the Cross-College <i>Drugs and Substance Abuse Policy</i>.</p> |

| Online Sexual Abuse: | Faith Abuse: |
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| <p>Online Sexual Abuse is the use of technology to manipulate, exploit, coerce or intimidate a child to (but not limited to): engage in sexual activity; produce sexual material/content; force a child to look at or watch sexual activities; encourage a child to behave in sexually inappropriate ways; or groom a child in preparation for sexual abuse (either online or offline). It can also involve directing others to, or coordinating, the abuse of children online.</p> <p>As with other forms of sexual abuse, online abuse can be misunderstood by the child and others as being consensual, occurring without the child’s immediate recognition or understanding of abusive or exploitative conduct. In addition, fear of what might happen if they do not comply can also be a significant influencing factor.</p> <p>No child under the age of 18 can consent to being abused or exploited. Financial gain can be a feature of online child sexual abuse, it can involve serious organised crime and it can be carried out by either adults or peers.</p> | <p>The number of known cases of child abuse linked to accusations of “possession” or “witchcraft” is small, but children involved can suffer damage to their physical and mental health, their capacity to learn, their ability to form relationships and to their self-esteem. Such abuse generally occurs when a carer views a child as being “different”, attributes this difference to the child being “possessed” or involved in “witchcraft” and attempts to exorcise him or her.</p> <p>If a member of staff at Clifton College becomes aware of a child who is being abused in this context, they should report their concerns to the DSL who will follow the normal referral route in to children’s social care.</p> |
| Fabricated or Induced Illness (FII): | Forced Marriage: |
| <p>Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.</p> <p>Supplementary guidance, <i>Safeguarding Children in whom Illness is Fabricated or Induced</i> (2008), sets out a national framework within which agencies and professionals at local level – individually and jointly – draw up and agree upon their own more detailed ways of working together where illness may be being fabricated or induced in a child by a carer</p> | <p>Forced marriage is not the same as an arranged marriage, as it involves coercion and force as opposed to a marriage based on free choice.</p> <p>It affects both males and females.</p> <p>The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of schools and colleges.</p> <p>Staff should report concerns regarding forced marriage to the DSL or can contact the Forced Marriage Unit if they need advice or information.</p> |

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| <p>who has parenting responsibilities for them.</p> <p>Staff should report any concerns about FII to the DSL.</p> | <p>Contact: 020 7008 0151 or email: fmu@fco.gov.uk</p> |
| <p>Gangs and Youth Violence:</p> | <p>Homelessness:</p> |
| <p>College staff should be aware of the particular risks to young people involved in gangs from violence and weapons; drugs and sexual exploitation and should report any concerns immediately to the DSL. Further information can be found in the Home Office document - <i>Advice to schools and colleges on gangs and youth violence</i>.</p> <p>Serious Violence</p> <p>All staff should be aware of the signs that indicate a child is at risk of, or involved with serious violence, this includes: absence from school, change of friendship group, unexplained injuries, self-harm, unexplained gifts or possessions. Staff should also be aware of relevant guidance Preventing youth violence and gang involvement.</p> | <p>Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.</p> <p>The DSL (and any Deputy DSLs) should be aware of the contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.</p> |

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| <p>So-called ‘Honour-Based’ violence (HBV):</p> | <p>Domestic violence, gender-based violence, Violence against Women and Girls (VAWG) and Teenage Relationship Abuse:</p> |
| <p>Members of staff at Clifton College should be aware that ‘Honour-based’ violence (HBV) encompasses a range of 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. Indicators of HBV and associated factors will be covered with staff within the College safeguarding training. Staff should be alert to the possibility of a child being at risk of HBV, or already having suffered HBV. Staff should speak with DSL if they have concerns about HBV.</p> | <p>This involves any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those who are, or have been in relationships or family members regardless of gender or sexuality and is applicable to teenagers engaged in abusive relationships.</p> |
| <p>Child Sexual Exploitation (CSE):</p> | <p>All types of Peer on Peer Abuse including: Bullying, Cyber Bullying, Physical Abuse, Sexual Violence, Sexual Harassment, Sexting, Upskirting, Initiation and Hazing type violence:</p> |
| <p>Child sexual exploitation is a form of 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:</p> <ul style="list-style-type: none"> ● in exchange for something the victim needs or wants; and/or ● for the financial advantage or increased status of the perpetrator or facilitator. <p>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.</p> | <p>All schools are required to have due regard to the need to eliminate discrimination, harassment and victimisation and other conduct that is prohibited under the Equality Act 2010. Schools should tackle prejudice and promote understanding between those who share a protected characteristic and those who do not, as set out in the Equality Act 2010.</p> <p>The definition that has been adopted by the government and should be used when considering prejudice related incidents ‘A prejudice related incident is any incident which is perceived to be prejudiced by the victim or any other person’</p> <p>Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain</p> |

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| | sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. |
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Additional information about key safeguarding areas can also be found in *Keeping Children Safe in Education - Annex A (2019)*.

24. IDENTIFYING AND ASSESSING RISK

Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

The format of risk assessment may vary and may be included as part of the College's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the College's approach to promoting pupil welfare will be systematic and pupil focused.

The Head of College has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.

Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with carrying out the particular assessment.

25. MONITORING AND REVIEW

The DHS, in close liaison with the College's DSL's, will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the Council as necessary and seeking contributions from staff. The DHS will update the Senior Management Team regularly on the operation of the College's safeguarding arrangements.

Any safeguarding incidents at the College will be followed by a review of these procedures by the DHS and/or the DSL's and a report made to the Council. Where an incident involves a member of staff, the Designated Officer may be asked to assist in this review to determine whether any improvements can be made to the College's procedures. Any deficiencies or weaknesses identified in regard to safeguarding arrangements at any time will be remedied without delay.

The Council will undertake an annual review of this policy and the College's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working.

The DHS will work with the Chair of the SWC, preparing a written report commissioned by the Council. The written report should address how the College ensures that this policy is

kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the College and how these have been handled; and the contribution the College is making to multi-agency working in individual cases or local discussions on safeguarding matters. The Council should also consider independent corroboration, such as:

- inspection of records or feedback from external agencies including the Designated Officer;
- reports of ISI inspections;
- the outcome of any relevant parental complaints; and
- press reports.

The Council will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy its final approval. Detailed minutes recording the review by the Council will be made.

26. RECORD KEEPING

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The records created in accordance with this policy may contain personal data. The College has a number of privacy notices which explain how the College will use personal data for the benefit of pupils and parents. The privacy notices are published on the College's website. In addition, staff must ensure that they follow the College's data protection policies and procedures when handling personal data created in connection with this policy. This includes the College's Data Protection Policy and Information Security Policy.

All records created in accordance with this policy are managed in accordance with the College's policies that apply to the retention and destruction of records.

Insofar as pupil records are concerned:

- staff must record all concerns about a pupil on CPOMS. The procedure, guidance and instructions for using CPOMS can be found on the Safeguarding pages of the Clifton College Resource Centre; and
- the DSL will record on CPOMS all discussions with both colleagues and external agencies, decisions made and the reasons for them and detail of the action taken.

APPENDIX 1: QUICK REFERENCE SAFEGUARDING CONTACT DETAILS

| Name and Role: | Contact Email: | Contact Number: |
|--|--|--------------------------------|
| Mrs Jo Newman Deputy Head cross College Safeguarding + Prevent Lead | jnewman@cliftoncollege.com | 07791 71 5318 0117 315 7590 |
| Mr Ed Swanwick Designated Safeguarding Lead + WRAP Trainer (Upper School) | eswanwick@cliftoncollege.co.uk | 07745 19 9226 0117 315 7170 |
| Mr David Pafford Designated Safeguarding Lead (Preparatory School N - Y8) | dpafford@cliftoncollege.com | 07921 47 1969 |
| Mrs Kath Jeffery Deputy Designated Safeguarding Lead (Upper School) and E-Safety Lead | kjeffery@cliftoncollege.com | 07791 715323 0117 315 7321 |
| Mrs Becki Davies Deputy Designated Safeguarding Lead (Upper School) | rdavies3@cliftoncollege.com | 07738 804541 0117 315 7243 |
| Mrs James Averis Deputy Designated Safeguarding Lead (Preparatory School Y4 - 8) | javeris@cliftoncollege.com | 0117 3157 583 |
| Deputy Safeguarding Lead Pre Prep (<i>recruitment in process</i> 22/10/19) | | |
| Safeguarding Coordinator (<i>recruitment in process</i> 22/10/19) | | |

The Chair of the Safeguarding and Welfare Committee is Mark Eldridge -
Email: safeguardingcouncil@cliftoncollege.com

The Chair of Council is Nick Tolchard -
Email: chairman@cliftoncollege.com

The Head of College is Dr Tim Greene -
Email: tgreene@cliftoncollege.com

The Designated Officer is Nicola Laird - Tel: 0117 903 7795

First Response, Bristol - Tel: 0117 903 6444

Keeping Bristol Safe Partnership -

KBSP Safeguarding (CH), PO Box 3176 Bristol, BS3 9FS

<https://bristolsafeguarding.org/children-home/contact/contact-the-bscb/>

APPENDIX 2: KEY DOCUMENTATION, PROCEDURES AND GUIDANCE

- Keeping Children Safe in Education (2019);
- What to do if you're worried a child is being abused (2015);
- Working together to safeguard children (2018);
- Designated teacher for looked after and previously looked after children (2018);
- Prevent Duty guidance for England and Wales (2015);
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2018);
- The Teachers' Standards (2012);
- Mandatory Reporting of Female Genital Mutilation – procedural information (2015);
- [Behaviour and discipline in schools](#) (2015);
- [Children missing education](#) (2016);
- [Parental responsibility measures for behaviour and attendance](#) (2015);
- Multi-Agency statutory guidance on female genital mutilation (2016);
- Promoting the education of looked-after children and previously looked-after children (2018);
- Supervision of activity with children (2012);
- Disqualification under the Childcare Act 2006 (2018);
- [Education for children with health needs who cannot attend school](#) (2013);
- [SEND code of practice: 0 to 25 years](#) (2015);
- [Supporting pupils at school with medical conditions](#) (2015);
- [Education \(Independent Schools Standards\) Regulations 2014](#) (ISSR);
- <https://www.proceduresonline.com/swcpp/>;
- Channel duty guidance: protecting vulnerable people from being drawn into terrorism (HM Government, April 2015);
- Sexting in schools and colleges: responding to incidents and safeguarding young people (UK Council for Child Internet Safety (UKCCIS), August 2016);
- Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (DfE, February 2017);
- Sexual violence and sexual harassment between children in schools and colleges (DfE, May 2018);
- Strategy for dealing with safeguarding issues in charities (Charity Commission, December 2017);
- Regulatory alert to charities - safeguarding (Charity Commission, December 2017);
- How to report a serious incident in your charity (Charity Commission, September 2017).

Annex A of *Keeping Children Safe in Education 2019* also contains links to additional guidance and resources that staff may find useful to refer to.

APPENDIX 3: ROLE OF THE DEPUTY HEAD CROSS-COLLEGE SAFEGUARDING (DHS)

Purpose of the job:

- to lead on the case management and oversight of safeguarding concerns across Clifton College including CCSL activities;
- lead, develop and implement safeguarding specific and related policies, procedures and practice standards, ensuring these are maintained and up to date;
- support the safeguarding teams to ensure that all cross-cutting issues relating to safeguarding are identified and addressed;
- lead, commission and contribute to improvement projects as necessary to support the safeguarding of children and young people and improve outcomes of vulnerable children and young people, in line with best practice and outcomes;
- lead the development of best practice by embedding high quality safeguarding practice through line managers and relevant staff responsible for operational safeguarding matters;
- develop and promote 'The Children's voice'; and
- to identify and report on the opportunities for organisational learning arising from safeguarding concerns, complaints, incidents and other significant events.

Key responsibilities:

- to lead and support the Safeguarding Team;
- to support the case management of complex safeguarding issues and support the Safeguarding Team and frontline staff in the case management of other safeguarding concerns, including concerns regarding staff;
- to oversee the development and delivery of safeguarding training and in partnership with the safeguarding team;
- to review, and where necessary develop, policies, procedures and guidance in relation to safeguarding and other areas of practice that may be relevant;
- to represent Clifton College externally at relevant meetings, forums, conferences, etc;
- to ensure the College is contributing to and learning from wider developments in safeguarding practice;
- to lead and promote an organisational culture of best practice in safeguarding at all times;
- to work closely within the College to promote an open culture where safeguarding concerns, near misses, incidents and issues can be shared openly;
- to maintain an awareness of national issues, policy and practice developments and ensure these are used to inform the College's ways of working;
- to undertake critical incident, concern at work, or disciplinary investigations and to contribute to disciplinary panels as agreed with the Head of College;
- to participate in supervision and annual appraisal and maintain responsibility for own personal development programme;
- to abide by the legislation and regulations in relation to data management, information sharing and the General Data Protection Regulations;

- be responsible for the health and safety of self and others under the Health and Safety regulations; and
- undertake any other relevant duties consistent with the role.

APPENDIX 4: ROLE OF THE DESIGNATED SAFEGUARDING LEAD (DSL)

The name and contact details of the DSL and Deputy DSL are set out in Appendix 1. In accordance with Annex B of KCSIE, the main responsibilities of the DSL are:

Managing referrals

The DSL is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to the local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or has left due to risk/harm to a child to the Disclosure and Barring Service (DBS) as required; and
- refer cases where a crime may have been committed to the police as required.

Work with others

The DSL is expected to:

- liaise with the Head to inform him/her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the Case Manager and the designated officer at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT technicians and SENCOs/named person with oversight for SEN) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for staff.

Raise awareness

The DSL should:

- ensure the College's child protection and safeguarding policies and processes are known, understood and used appropriately;
- ensure this policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the College regarding this;
- ensure this policy is available publicly and parents are aware that referrals about suspected abuse or neglect may be made and the role of the College in this; and
- link with Keeping Bristol Safe Partnership to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Child Protection File

Where children leave the College the DSL shall ensure their child protection file is transferred to any new school or college as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt will be obtained.

In addition, the DSL will consider if it is appropriate to share any information with the new school or college in advance of a child leaving.

On receiving a child protection file, the DSL will ensure that key staff are aware as required, including the SENCO/named person with oversight for SEN.

Prevent

In accordance with the *Prevent duty guidance for England and Wales* and *Channel duty guidance: protecting vulnerable people from being drawn into terrorism* (HM Government, July 2015) the DSL has, in addition, the following responsibilities:

- acting as the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty;
- coordinating Prevent duty procedures in the College;
- liaising with local prevent coordinators, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and/or the police where indicated;
- undergoing WRAP or other appropriate training;
- maintaining ongoing training programme for all College employees including induction training for all new employees and keeping records of staff training; and
- monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty.

Training

The DSL and the Deputy DSL have undertaken training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent duty awareness training and will be updated at least every two years. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority Children's Social Care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understands the College's child protection and safeguarding policy and procedures, especially new and part-time staff;

- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- understand the importance of information sharing, both within the College, and with the KBSP, other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the College with regard to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- 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 College;
- 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;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them.