CLIFTON COLLEGE

Safeguarding and Protecting Children Policy

REVIEW:

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APPROVED BY:

Name:	Role:	Signature:	Date:
Mark Eldridge	**Chair of the Safeguarding and Welfare Committee**		15/08/2024

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1. DEFINITIONS

Safeguarding is defined as: providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children, and taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

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.

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) 2024 is statutory guidance from the Department for 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. This policy also covers any pupil over the age of 18 that is still on Clifton College roll

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. 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 robust 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.

Clifton College must keep pace with changes in education. We will work in accordance with the DfE and local authority to develop new approaches to scrutinising our policies and procedures.

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

Current Legislation:

- Education and Skills Act 2008;
- Children Act 1989;
- Children Act 2004;
- Childcare Act 2006;
- Children and Social Work Act 2017;
- Data Protection Act 2018 and UK General Data Protection Regulation (GDPR);
- Equality Act 2010; and
- Charities Act 2011.

Statutory Guidance:

- *Working Together to Safeguard Children* (2023), 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 (KCSIE)* (2024) 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;
- *South West Child Protection Procedures*, which provides agencies in the South West of England with multi-agency child protection procedures;
- *Working Together to Improve School Attendance* (2024) is statutory guidance issued by the Department for Education which applies to all schools to maintain high levels of school attendance;
- *Education (Independent School Standards) Regulations* (2014) is a set of regulations established by the Department for Education to ensure that independent schools meet specific standards of education, welfare, and safety;
- *Boarding Schools: national minimum standards* (2022) are guidelines set by the Department for Education to ensure the welfare, safety, and quality of life for students living in boarding schools.

- *Statutory Framework for the Early Years Foundation Stage* (2023) is a set of standards issued by the Department for Education that outline the requirements for the care, learning, and development of children from birth to five years old.

Key documentation, procedures & guidelines are detailed in Appendix 2.

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), supply teachers, contractors; volunteers working in the College and members of the Clifton College Council. It should be read in conjunction with the following policies:

- Safer Recruitment Policy;
- Whistleblowing Policy;
- Code of Conduct for Staff;
- Anti-Bullying Policy;
- Behaviour Policies;
- Online Safety Policy and IT Acceptable Use Agreements;
- Attendance Policy;
- Missing Pupil Policy;
- Special Educational Needs & Disabilities Policy;
- Risk Assessment Policy for Pupil Welfare;
- Health and Safety Policy;
- Adults/Children resident on Campus; and
- Protecting and Safeguarding Vulnerable Adults from Abuse

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

3. THE ROLE OF THE COUNCIL

The 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 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 attends appropriate refresher training every two years;
- All 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;
- the Chair of the SWC will liaise with the Head of College 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 Designated Safeguarding Lead and their identity and contact details, together with the details of their Deputies;
- information on the different types of abuse (including Child on child Abuse, Prevent, Female Genital Mutilation (FGM) and Children Missing Education (CME));Annex B
- read and understand Part 1 of *Keeping Children Safe in Education 2024*, 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 2024*, 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 Inset training, The National College, 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 Child on child Abuse, Cyberbullying, Mental Health, Prevent, Child Sexual Exploitation and Female Genital Mutilation.

iii) Members of Council

- all Members of Council receive both induction and annual refresher 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) Designated Safeguarding Lead Training:

- the DSL 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 DSL and Deputy DSLs will undertake relevant Prevent and FGM 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. All training is recorded and reviewed regularly by the Cross-College Education Safeguarding Group (CCESG).

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' (2024) including scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining relevant references, checking previous employment history, digital screening, 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 2024). 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 Safer Recruitment 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 Visitors policy.

Staff Support

It is recognised that 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 and Mental Health

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 and Sex Education (RSE) and through Personal, Social, Health and Economic (PSHE) education, to explore key areas such as self-esteem, emotional literacy, assertiveness, building resilience to radicalisation, online safety and anti-bullying.

All staff should also be aware that mental health problems can be, in some cases, an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy. (KCSIE 2024)

Whole School Approach

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.

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.

Safeguarding - Extra-familial harm and factors outside of the College

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Safeguarding Expectations for External Hire/Use of College Premises

Everyone who comes into contact with the College must familiarise themselves with Appendix 4 of this policy. The appendix sets out the responsibilities of the College, the hiring/visiting organisation and the Clifton College Education Group staff.

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

The DSL is the Director of Safeguarding, a senior member 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 the DSL and Deputy DSLs are available on the College website, newsletters, or the Clifton College Safeguarding Team posters across the College.

The DSL 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.

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.

National Police Chiefs Council (NPCC) - When to call the police should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do. Details of the NPCC can be found here.

A detailed description of the role of the DSL and the required training content is set out in Appendix C and *Keeping Children Safe in Education (2024)* – Annex C.

7. 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 DSL, DDSLs;
- 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 of *Keeping Children Safe in Education* 2024 (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;
- Understand the 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 (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 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.

8. 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 **DSL** or the **DDSL** in the DSL's absence. The contact details of the 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 DSL or DDSL is unavailable?

The 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 DSL and Deputy DSL are unavailable, which may occur outside term time or College hours, staff must not delay taking action. Staff should call the Upper or Preparatory School duty phone or the Deputy Head Pastoral in order to speak to 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 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 Internet Safety and the Department for Digital, Culture, Media and Sport advice note _Sharing nudes and semi-nudes: how to respond to an incident_ 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' -

<u>**Recognise → Respond → Reassure → Refer → Record**</u>

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 Person, 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 24 of KCSIE and the information 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](#)

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 Local Authority Designated Officer, 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:

New safeguarding partners and child death review partner arrangements are in place. Locally, the three safeguarding partners (the local authority; Integrated Care System for an area within the local authority; and the chief officer of police for an area (any part of which falls) within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

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 here.

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.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/ for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0808 800 5000 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 2014, Updated 2019).

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.

9. MANAGING ALLEGATIONS MADE AGAINST/CONCERNS RAISED IN RELATION TO TEACHERS INCLUDING SUPPLY TEACHERS, OTHER STAFF, VOLUNTEERS AND CONTRACTORS, THE HEAD OF COLLEGE OR MEMBERS OF COUNCIL

The procedures in this policy apply to all staff, supply teachers, volunteers, contractors and members of Council who may pose a risk of harm to children and outlines the College's 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.

CPOMS StaffSafe

CPOMS StaffSafe is an online tool that allows the College to record any and all incidents regarding staff. This includes (but is not limited to) allegations, referrals to the Local Area Designated Officer, self-reporting and any low-level concerns a staff member may have regarding conduct and/or safeguarding. This may also include incidents that do not meet the allegations threshold (see below) or is otherwise not considered serious enough to consider a referral to the LADO.

Where necessary, information regarding a staff member logged onto CPOMS StaffSafe may be used in an investigation regarding that staff member.

Self-reporting

The College encourages an open and transparent culture, therefore all staff are encouraged to "self-report" any incident that could be interpreted as a breach of or be inconsistent with, this policy and/or the Code of Conduct. Self-reporting can be done by emailing safeguarding@cliftoncollege.com

Levels of Allegation/concern

There are two levels of allegation/concern, namely:
1. Allegations that meet the harms threshold
2. Allegations/concerns that do not meet the harms threshold - referred to as 'low-level concerns'.

The harms threshold

Allegations that meet the harms threshold are those where a member of staff, supply teachers, volunteers, contractors or members of Council has:

- **behaved in a way that has harmed a child, or may have harmed a child and/or;**
- **possibly committed a criminal offence against or related to a child and/or;**
- **behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or**
- **behaved or may have behaved in a way that indicates they may not be suitable to work with children.**

10. ALLEGATIONS THAT MEET THE HARMS THRESHOLD

Managing Allegations

Any allegations against staff, supply teachers, volunteers, contractors, organisations or individuals using school premises or members of Council that meet the harms threshold will be dealt with in accordance with the Keeping Bristol Safe Partnership procedures. Advice from the Local Authority 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 (contracted as well as employed directly by the College), volunteer or Member of Council (other than the Head of College), the matter should be reported immediately to the Head of College. The Head of College will consult with the Local

Authority 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 (without first informing the Head of College). The Chair of Council will then liaise with the Local Authority Designated Officer to decide before a decision is made on any further action required.

If the allegation relates to the DSL, then this should be reported to the Head of College and the Chair of Council who will then liaise with the Local Authority Designated Officer regarding further action.

The Local Authority 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.

If it is not possible to report in the circumstances set out above, a report should be made immediately to the LADO. The LADO will take action in accordance with their procedures. 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 Local Authority 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 Local Authority 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 2024* and the College's employment procedures.

Suspension will not be an automatic response to an allegation. The Local Authority 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 and on CPOMS StaffSafe. 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 2024*, 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 required[1].

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. CONCERNS THAT DO NOT MEET THE HARMS THRESHOLD

What is a low-level concern?

The term 'low-level' concern does **not** mean that it is insignificant, it means that the behaviour towards a child does not meet the harm threshold.
A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:
- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Some examples of such behaviour, as given in KCSIE 2024, could include, but are not limited to:
- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Sharing low-level concerns

Low-level concerns about members of staff, supply teachers, volunteers, contractors or members of Council will be reported using the same procedures as those that apply to allegations that meet the harm threshold.

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[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.*

Where a low-level concern is raised against any current member of staff (other than the Head of College), the matter should be reported immediately to the Head of College. Where appropriate, the Head of College will consult with the DSL.

If the low-level concern relates to the Head of College then this should be reported to the Chair of Council (without first informing the Head of College). The Chair of Council will then liaise with the DSL to decide before a decision is made on any further action required.

If the low-level concern relates to the DSL, then this should be reported to the Head of College and the Chair of Council.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school or college, the Head of College will also inform the person's employer, so that any potential patterns of inappropriate behaviour can be identified.

Where a low level concern relates to an organisation or individual using the school premises, Clifton College will follow its own safeguarding policies and procedures, including informing the Local Authority Designated Officer. For further information on the safeguarding expectations for external hire/use of College premises please refer to Appendix 4 of this policy.

Where a low-level concern has been raised by a third party, the Head should collect as much evidence as possible, by speaking, where possible, with the person who raised the concern, to the individual involved and to any witnesses.

It is very important to stress that individuals raising concerns do not need to be able to determine in each case whether their concern is a low-level concern or meets the harm threshold. Everyone should share what they believe to be a low-level concern with the Head of College or in line with the process set above.

Responding to low-level concerns

Having discussed the matter with the Head of College, the DSL will inform the individual in question what was shared about their behaviour and give them an opportunity to respond. The DSL will then review the information available to them from discussing the matter in detail with the individual about whom the concern has been raised, the individual raising the concern and any other witnesses. The Head of College will then determine whether the behaviour constitutes (i) behaviour entirely consistent with the College's Code of Conduct, (ii) a low-level concern or (iii) whether the single concern raised or this concern in the light previous concerns meet the harm threshold, in which case it will be dealt with as described in section 11 of this policy. Where there is any doubt, advice will be sought from the LADO.

If the behaviour is consistent with the College's Code of Conduct, the DSL will inform the individual in question and also speak to the person who shared the low-level concern in order to provide them with feedback about how and why the behaviour is consistent with the College's Code of Conduct.

If the behaviour constitutes a low-level concern the DSL following consultation with the Head of College will make clear to the individual why their behaviour is concerning, what change is required in their behaviour and what support they might need in order to achieve. The DSL will be clear about the consequences if they fail to reach the required standard or repeat the behaviour. The DSL may decide that ongoing and transparent monitoring of the individual's behaviour may be appropriate or that an action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate.

Recording low-level concerns

All low-level concerns will be recorded using CPOMS StaffSafe. The record will include details of the concern, the context in which the concern arose, and the action taken. The name of the individual sharing their concerns will be noted. If the individual wishes to remain anonymous then this will be respected as far as reasonably possible.

Records of low-level concerns will be reviewed by the DSL and reported to the Safeguarding and Welfare Committee so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where potential patterns of concerning, problematic or inappropriate behaviour have been identified, the school will decide on a course of action. This might be an internal disciplinary procedure or referral to the LADO if the harms threshold is met. The school will consider if any wider cultural issues in the school have enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference.

12. CHILD ON CHILD ABUSE (INCLUDING SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN)

The College recognises its responsibility to children who are subject to harassment, violence and or abuse. The College understands its responsibilities in ensuring that the rights and protections set out in both the Human Rights Act (1998) and the Equalities Act 2010 are complied with.

It is very important for all staff to recognise that children are capable of abusing their peers (including online). Clifton College has a zero-tolerance approach to abuse. It should never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for 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.

Child on child 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 extra familial harm, 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 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 Child on child 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.

Child on child 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). Child on child abuse can take various forms, including (but not limited to):
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment (see Part five of KCSIE 2024);
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) - see section below;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals.

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 child on child abuse. Signs that a child may be suffering from child on child abuse can also overlap with those indicating other forms of abuse. Any child can be vulnerable to child on child abuse due to the strength of peer influence during adolescence. It is more likely that girls will be victims and boys perpetrators, but that all child on child abuse is unacceptable and will be taken seriously.

Sexual violence and sexual harrassment between children

The College has a zero-tolerance approach to sexual violence and sexual harassment. It is never acceptable and will not be tolerated. 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 reports and concerns, including those outside the College or online will be taken seriously by the College and those affected will be offered appropriate support. All victims will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Staff should be aware that some groups of individuals are potentially more at risk of child on child sexual violence – for example evidence shows that girls, children with SEND, Lesbian, Gay, Bisexual, or Gender Questioning (formerly referred to as LGBTQ+) children and boarders sharing overnight accommodation are at greater risk.

Harmful sexual behaviour

Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment. Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). When considering HSB, ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma and should be offered appropriate support.
Harmful sexual behaviour, like all child on child abuse, is never acceptable and will be taken seriously.

Sexual harassment

Sexual harassment refers to 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. Child on child sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:
- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (This may also constitute sexual violence) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of

sexual harassment and/or sexual violence. This may include:
  - consensual and non-consensual sharing of nude and semi-nude images and videos - see section below;
  - sharing of unwanted explicit content - see section below;
  - digitally manipulating an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new nude or semi-nude image of a young person;
  - upskirting;
  - sexualised online bullying;
  - unwanted sexual comments and messages, including, on social media;
  - sexual exploitation; coercion and threats.

All cases of sexual harassment must be challenged. If not challenged, inappropriate behaviours can be normalised and provide an environment that may lead to sexual violence.

Sexual violence

References to **sexual violence** are references to sexual offences under the Sexual Offences Act 2003, specifically:
  - Rape;
  - Assault by Penetration;
  - Sexual Assault; and
  - Causing someone to engage in sexual activity without consent.

Consent

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents only if they agree by and have the freedom and capacity to make that choice. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16.

It is important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation. The DSL should always lead the response to such incidents. If in any doubt, the DSL will seek expert advice. Sexual intercourse without consent is rape.

KCSIE Part Five and links therein provide further detailed advice.

Minimising the risk of Child on child abuse

Clifton College actively seeks to raise awareness of and prevent all forms of child on child abuse by:
  - training staff on how to; recognise signs of child on child abuse, manage disclosures and report such incidents in accordance with this policy and its procedures
  - educating children about the nature and prevalence of child on child 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 child on child abuse issues are reported as safeguarding concerns in accordance with the procedures in this policy to enable the DSL to identify 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; and
- responding to cases of child on child abuse promptly and appropriately.

How Allegations of child on child abuse are Recorded, Investigated and Dealt With:

It is essential that all concerns/allegations of child on child 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 *Part 5 of Keeping Children Safe in Education (2024)*. 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 children's social care 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 child on child 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 children's social care, 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 child on child abuse will be assessed on a case by case basis and taking into consideration DfE guidance on contextualised safeguarding.

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

Support for those Affected by child on child Abuse:

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Support for those involved in cases of child on child 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 children's social care, 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 children's social care or the Police whether, and if so when and by 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 child on child abuse remain protected, especially from bullying or harassment. Clifton College will support all pupils involved in accordance with the advice of the relevant agencies.

Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

This policy uses the term 'sharing nudes and semi-nudes' to mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline and digitally manipulated images of young people into an existing nude online or use of artificial intelligence (AI) to generate a new nude or semi-nude image of young people.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

Many professionals may refer to 'nudes and semi-nudes' as:
● youth produced sexual imagery or 'youth involved' sexual imagery indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18;
● 'sexting'. Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images;
● image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes
● Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared.

Staff should be aware of the dangers posed to children and young people in relation to sharing nudes and semi-nudes images and videos. The College treats all such incidents as safeguarding matters to be actioned in accordance with this policy. Members of staff should not view any youth produced sexual imagery which is reported to them, or copy, print or share the images under any circumstances. In referring to any incident of sharing nudes and semi-nudes images and videos, members of staff should describe the content of the images as reported to them.

Staff should report any concerns regarding sharing nudes and semi-nudes images and videos immediately to the DSL. Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

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 about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved;
● it is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the child or young person or parent or carer in making a report;
● it is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network.

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

- never copy, print, share, store or save them; this is illegal. If this has already happened, please contact your local police for advice and to explain the circumstances;
- discuss the decision with the Head of College;
- make sure the viewing takes place with another member of the safeguarding team; this staff member does not need to view the images.
- wherever possible, make sure viewing takes place on the premises of the education setting, ideally in a member of the senior leadership team's office;
- make sure wherever possible that they are viewed by a staff member of the same sex as the child or young person in the images;
- record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions. Ensure this is signed and dated and meets any appropriate wider standards e.g. such as those set out in statutory safeguarding guidance and local authority policies and procedures;

Any member of staff who views an indecent image should be given appropriate support.

If any devices need to be taken and passed onto the police, the device(s) should be confiscated and the police should be called. The device should be disconnected from Wi-Fi and data, and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device should be placed in a secure place, for example in a locked cupboard or safe until the police are able to come and collect it.

If the school has decided that other agencies do not need to be involved, then consideration should be given to deleting nudes and semi-nudes from devices and online services to limit any further sharing.

In most cases, children and young people should be asked to delete the imagery and to confirm that they have deleted them. They should be given a deadline for deletion across all devices, online storage or social media sites. They should be reminded that possession of nudes and semi-nudes is illegal. They should be informed that if they refuse or it is later discovered they did not delete the imagery, they are continuing to commit a criminal offence and the police may become involved.

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). The Report Remove tool or Take it Down tool can also be used to remove nude images shared online.

Any decision to search a child or young person's device and delete imagery should be based on the professional judgement of the DSL (or equivalent) and should always comply with the safeguarding or child protection policy and procedures of the education setting. All of these decisions need to be recorded, including times, dates and reasons for decisions made and logged in the safeguarding records. Parents and carers should also be informed unless this presents a further risk to any child or the young person.

Where a pupil receives unwanted images, the College should advise the pupil and their 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, staff can refer to UKCIS and Department for Digital, Culture, Media and Sport guidance, *Sharing nudes and semi-nudes advice for education settings working with child*.

13. CHILDREN MISSING EDUCATION (CME)/CHILD CRIMINAL EXPLOITATION (CCE)/CHILD SEXUAL EXPLOITATION (CSE)

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 can be found here.

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range

from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. (KCSIE 2024)

14. 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 2024).

Regulated professionals have a <u>mandatory reporting duty</u> 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 <u>FGM Safeguarding Guidance 2023</u>.

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.

15. 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 Colleges Prevent Lead is a member of the Safeguarding Team.

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.

For the purposes of compliance with the Prevent duty, the College has adopted the Government's definitions of Extremism, Radicialisation and Terrorism as per the Channel

Duty Guidance, Definition of Extremism Guidance and the Counter-terrorism strategy (CONTEST).

- **Extremism:** the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
  1. negate or destroy the fundamental rights and freedoms of others; or
  2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
  3. intentionally create a permissive environment for others to achieve the results in (1) or (2).
- **Radicalisation:** the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
- **Terrorism:** The use or threat of serious violence against a person or serious damage to property where that action is:
  1. designed to influence the government or an international governmental organisation or to intimidate the public or a section of the public; and
  2. for the purpose of advancing a political, religious, racial or ideological cause.'

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 people susceptible to radicalisation notes that "There is no single way of identifying who is at risk of being radicalised into terrorism or supporting terrorism. Factors may include: peer or family pressure, influence to support an ideology from other people or via the internet, bullying, being a victim or perpetrator of crime, anti-social behaviour, family tensions, hate crime, lack of self-esteem or identity, personal or political grievances" Guidance can be found here

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 Designated Safeguarding Lead or call 101 (999 if the child is at immediate risk of harm).

The latest Prevent referral form is available on the College's Resource Centre under 'Safeguarding'. Forms must be emailed to **CTPSWFIMU@avonandsomerset.pnn.police.uk** and a contact phone number is **01278647160.**

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 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

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). Teachers may wish to utilise the **Educate Against Hate** site for signs of radicalisation and guidance on how to spot these

16. ONLINE SAFETY

Clifton College is increasingly working online, therefore it 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 use of artificial intelligence (AI) produced or AI manipulated images have the potential to cause harm to the whole College community, it is therefore important that the use of such technologies is in line with the relevant Acceptable Use Policy. The use of AI must never be in contravention of legislation and both statutory and non-statutory guidance.

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 use mobile phones or any mobile device with a camera facility whilst on 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 Online Safety Policy which provides more information on the College's approach to online safety, both in school and whilst working at home, and also details the measures in place to limit children and young people's exposure to risk online.

Filtering and Monitoring: 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. All pupil College devices and desktops are subject to Smoothwalls monitoring software. More information can be found here.

Mobile technology: There is a challenge of not being able to monitor pupil access to 3G/4G/5G via their mobile devices and the use of virtual private networks (VPN's) and therefore our reliance here remains on good education in Online Safety.

17. 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 parents, carers, educational guardians and homestays to report private fostering arrangements to the local authority independently. The College will also report such arrangements to the local authority if it becomes aware of them, in line with its safeguarding obligations to pupils. The College will 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.

In the event that such arrangements are made, parents and carers are requested to inform the College directly and promptly.

18. PUPIL SUPPORT

Pupils are advised as to whom they can turn to if they need help; for example, staff and pupil support, trained counsellors, the Independent Person, 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, online safety and bullying.

i) We Listen (SWGfL tool Whisper)

We Listen (Whisper) is an anonymous reporting service provided by the South West Grid for Learning (SWGfL) used by Clifton College in the Preparatory and School and Upper School which pupils can access via online reporting form or SMS. Pupils can access the online form at <u>welisten.cliftoncollege.com</u>. We Listen is monitored and reviewed by the Safeguarding team.

The Pre-Prep have adapted their own version of anonymous reporting by implementing "Murray the Worry Bear".

ii) Children with Social Workers

KCSIE 2024 has advice and information for the DSL to help them access additional specific support for any child with an allocated social worker. Some children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse,

neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

19. 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 UK General Data Protection Regulation (GDPR) and Data Protection Act (DPA) 2018 provide a framework to ensure that personal information is shared appropriately. The College works inline with the DfE non-statutory Information Sharing Guidance (2024)

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 Local Authority 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.

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

All young 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) 2023 and the Equality Act 2010.

Clifton College will ensure that:

- no young children'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;
- adjustments will be made for any child who has delayed continence; and

- the physical environment for children is safe and secure and protects them from harm or the risk of harm.

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.

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 should be 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.

vi) EYFS Supervision and support

The EYFS setting will ensure that members of staff are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage 2023.

The EYFS management team recognise regular, planned and accountable supervision, which is a two-way process, offers support and develops the knowledge, skills and values of an individual, group or team. We see its purpose is to monitor the progress of professional practice and to help staff to improve the quality of the work they do, thus

improving outcomes for children as well as achieving agreed objectives. Supervision also provides an opportunity to discuss sensitive issues including the safeguarding of children and any concerns raised about an individual or colleague's practice.

All EYFS staff will receive regular and planned supervision sessions. Uninterrupted time will be set aside to ensure any supervision sessions are effective for both practitioner and management.

21. 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family 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 that '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.

Neglect:	Sexual Abuse:
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.	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. The sexual abuse of children by other children is a specific safeguarding issue in education.
Emotional Abuse:	Physical Abuse:
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	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.

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.	

22. 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.

23. 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.

24. KEY SAFEGUARDING AREAS

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

Attendance:	Bullying:
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. 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 *Attendance Policy* which is located on the Resource Centre.	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". Clifton College has separate *Anti-Bullying* 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.
Child and Adolescent Mental Health:	**Children and the Court System:**
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. 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.	Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. 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 B of *Keeping Children Safe in Education 2024*.
Child Criminal Exploitation: County Lines:	**Children with Family Members in Prison:**
Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from	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 should be aware of this and families should

urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Staff should report any concerns to the DSL.	not be judged or discriminated against because someone is in prison. 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/
Domestic Abuse:	**Drugs:**
The cross-government definition of domestic violence and abuse is: "Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality." "Domestic abuse can be, but is not limited to: psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn." Staff should discuss all concerns with the DSL.	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. 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. 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. For further information should refer to the *Drugs and Substance Abuse Policy.*

Online Sexual Abuse:	Faith Abuse:
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. 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. 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.	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. 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 into children's social care.
Fabricated or Induced Illness (FII):	**Forced Marriage:**
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. Supplementary guidance, RCPCH Perplexing Presentations (PP)/Fabricated or Induced Illness (FII) in Children Guidance (2022)., 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	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. It affects both males and females. When handling cases of forced marriage, you must refer to the Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage guidance. Staff should report concerns regarding forced marriage to the DSL or can contact the Forced Marriage Unit if they need advice or information.

who has parenting responsibilities for them. Staff should report any concerns about FII to the DSL.	Contact: 020 7008 0151 or email: fmu@fco.gov.uk
Gangs and Youth Violence:	**Homelessness:**
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. **Serious Violence** 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. Staff should be aware of the risk factors which increase the likelihood of involvement in serious violence such as being male, frequently absent or excluded from school, having experience of child maltreatment and having been involved in offending.	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. 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.

So-called 'Honour-Based' abuse (HBA):	Domestic violence, gender-based violence, Violence against Women and Girls (VAWG) and Teenage Relationship Abuse:
Members of staff at Clifton College should be aware that 'Honour-based' abuse (HBA) 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 HBA 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 HBA, or already having suffered HBA. Staff should speak with a DSL if they have concerns about HBA.	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.
Child Sexual Exploitation (CSE):	**All types of child on child Abuse including: Bullying, Cyber Bullying, Prejudice-based and Discriminatory Bullying, Physical Abuse, Sexual Violence, Sexual Harassment, Sharing of Nudes and Semi-nude Images and/or Videos, causing someone to engage in Sexual Activity without consent, Upskirting, Initiation and Hazing type violence:**
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: ● in exchange for something the victim needs or wants; and/or ● for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve	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. 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'

physical contact; it can also occur through the use of technology.	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 sexual gratification, or cause the victim humiliation, distress or alarm. **Upskirting is a criminal offence.**
Cybercrime	**Child Abduction and community safety incidents**
Cybercrime is a criminal activity committed using computers and/or the internet. It's broadly categorised as either "cyber-enabled" (crimes that can happen off-line but enabled at scale and speed online e.g. fraud, purchasing of illegal drugs, child sex abuse and exploitation) or "cyber-dependent" (crimes that can only be committed by using a computer). The DSL (or deputy) should consider referring into the Cyber Choices programme if they have concerns. This is a nationwide programme which intervenes when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.	Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers
Modern Slavery and the National Referral Mechanism	**Additional Support**
Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK	The Department has published further advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support. Prevent The Home Office has developed three e-learning modules: • Prevent awareness e-learning offers an introduction to the Prevent duty. • Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention. • Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

International Students
All staff have a role to play in ensuring the safety, wellbeing and protection from exploitation of the children which the College sponsors. Additionally, the College recognises: ● The admissions and recruitment staff have a role to play in spotting the signs of exploitation through the recruitment and admission of all pupils the College Sponsors. ● That children and families whose first language is not English may be particularly vulnerable to exploitation and that extra care should be taken to ensure that parents understand what they are consenting to. ● That sponsored and other international pupils in the UK without their parents/guardians may be particularly vulnerable and may need additional support in terms of their safety and wellbeing. ● That schools which have the ability to sponsor Child Student visa applications could be seen as soft targets for somebody trying to facilitate child trafficking into the UK

Additional information about key safeguarding areas can also be found in *Keeping Children Safe in Education* - Annex B (2024).

25. 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.

26. MONITORING AND REVIEW

The College's DSL 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 DSL will update the Senior Leadership 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 DSL and a report made to the Council. Where an incident involves a member of staff, the Local Authority 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 DSL 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 Local Authority 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.

27.   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 details of the action taken.

28. EQUAL OPPORTUNITIES STATEMENT

Clifton College maintains an equal opportunities policy in all areas of school life. The aim of this policy is to ensure that no pupil receives less favourable treatment than any other on grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. The College is committed to making this policy fully effective for all who study and work in the institution.

APPENDIX 1: QUICK REFERENCE SAFEGUARDING TEAM CONTACT DETAILS

Name and Role:	Contact Email:	Contact Number:
Designated Safeguarding Lead		
Mr Robert Farrow **Designated Safeguarding Lead**	**rfarrow2@cliftoncollege.com**	**07562616027** **0117 315 7567**
Deputy Designated Safeguarding Leads		
Mr James Averis **Deputy Designated Safeguarding Lead (Preparatory school)**	**javeris@cliftoncollege.com**	**07534 044842** **0117 315 7510**
Mrs Kath Jeffery **Deputy Designated Safeguarding Lead (Upper School)**	**kjeffery@cliftoncollege.com**	**07791715323**
Mr Jon Hughes **Deputy Designated Safeguarding Lead (Upper School)**	**jhughes@cliftoncollege.com**	**07562 680 208**
Ms Claire Cobham **Deputy Designated Safeguarding Lead (Upper School)**	**ccobham2@cliftoncollege.com**	**07562 680 188**
Mr Matt Salter **Deputy Designated Safeguarding Lead (Upper School)**	**msalter@cliftoncollege.com**	**07751 3727 255**
Ms Claire McCormack **Deputy Designated Safeguarding Lead (Upper School)**	**cmccormack@cliftoncollege.com**	**TBC**
Mrs Jean Hambley **Deputy Designated Safeguarding Lead (Preparatory School Y4 - 8)**	**jhambley@cliftoncollege.com**	**07803 504 248**
Mrs Sue Ingram	**singram@cliftoncollege.com**	**07513 727 262**

Deputy Designated Safeguarding Lead Pre Prep (Pre-Prep School R - Y3)		
Ms Gina Burnhill Early Years Foundation Stage (EYFS) Lead Practitioner	**gburnhill@cliftoncollege.com**	**07562 680 177**
Mr Ashley Stanton - CCSL Safeguarding Lead (CCSL)	**astanton@cliftoncollege.com**	**0117 3157 667 0770 3679 502**
Mr Iain Bell - CCSL Deputy Designated Safeguarding Lead (CCSL)	**ibell@cliftoncollege.com**	**07562 680 168**
Mr Steve Fielding - CCSL Deputy Designated Safeguarding Lead (CCSL)	**sfielding@cliftoncollege.com**	**07449 316 819**
Senior Safeguarding Practitioner & Online Safety Lead		
Ms Joanna Evans Senior Safeguarding Practitioner & Online Safety Lead	**jevans2@cliftoncollege.com**	**0756 261 6024 0117 315 7568**
Clifton College Education Council Members		
Nick Tolchard Chair of Council	**chairman@cliftoncollege.com**	
Mark Eldridge Chair of Safeguarding and Welfare Committee	**safeguardingcouncil@cliftoncollege.com**	
Loveday Ryder Boarding Welfare Member and Online Safety Member	**lryder@cliftoncollege.com**	
Ella Leonard Early Years Foundation Stage (EYFS) Member	**eleonard@cliftoncollege.com**	
Clifton College Education Group Key Contacts		
Mr Melvyn Roffe Chief Executive Officer	**mroffe@cliftoncollege.com**	
Dr Tim Greene	**tgreene@cliftoncollege.com**	**01173 157 190**

Head of College (Clifton College)		
Mr Jim Walton Headmaster Clifton College Preparatory School	jwalton@cliftoncollege.com	01173 157 500
Mr Stephen Symonds Headmaster Tockington Manor School	ssymonds@tockingtonmanorschool.com	01454 613 229
Mr Robert Farrow Director of Safeguarding	rfarrow2@cliftoncollege.com	07562 616 027
Ms Joanna Evans Senior Safeguarding Practitioner & Online Safety Lead	jevans2@cliftoncollege.com	0756 261 6024 0117 315 7568
Duty Phone numbers		
Emergency Deputy Head (Upper)		07803 507790
Emergency Duty Head (Pre)		07803 507788
Safeguarding Office		0117 315 7566

Key External Contacts	
Local Authority Designated Officer Bristol	Nicola Laird 0117 903 7795 LADO@bristol.gov.uk
First Response	First Response is the single point of entry for children who may need a service from children's social care Tel: 0117 903 6444 Information on how to make a referral can be found here
Support and Advice about Extremism	National Anti-Terrorist hotline: 0800 789 321 To raise concerns and ask for advice about radicalisation: Tel: 01278 647466 PreventSW@avonandsomerset.police.uk

	Police: Emergency 999; Non-Emergency 101 DfE: Non-Emergency: 020 7340 7264 Email: counter.extremism@education.gov.uk
NSPCC Child Protection Helpline	**Tel: 0808 800 5000**
Childline	**Tel: 0800 1111 www.childline.org.uk**
Local Safeguarding Partnership	**https://bristolsafeguarding.org/**

APPENDIX 2: KEY DOCUMENTATION, PROCEDURES AND GUIDANCE

- Keeping Children Safe in Education (2024);
- What to do if you're worried a child is being abused (2015);
- Working together to safeguard children (2023);
- Designated teacher for looked after and previously looked after children (2018);
- Prevent Duty guidance for England and Wales (2015; Updated 2023);
- Counter-terrorism strategy (CONTEST) (2023);
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2024);
- The Teachers' Standards (2011; Updated 2021);
- Mandatory Reporting of Female Genital Mutilation – procedural information (2015; updated 2020);
- Behaviour and discipline in schools (2015);
- Children missing education (2016);
- Parental responsibility measures for behaviour and attendance (2015, Updated 2020);
- Multi-Agency statutory guidance on female genital mutilation (2020);
- Promoting the education of looked-after children and previously looked-after children (2018);
- Guidance for Safer working practice for adults who work with children and young people in education (2019);
- Preventing and Tackling Bullying (2013; Updated 2017);
- Supervision of activity with children (2012; Published 2013);
- Disqualification under the Childcare Act 2006 (2018);
- Education for children with health needs who cannot attend school (2023);
- SEND code of practice: 0 to 25 years (2015, Updated 2020);
- Supporting pupils at school with medical conditions (2015);
- Education (Independent Schools Standards) Regulations 2014 (ISSR);
- South West Child Protection Procedures (Link);
- Channel duty guidance: Protecting people susceptible to radicalisation (2023);
- Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (2017);
- Strategy for dealing with safeguarding issues in charities (2017);
- How to report a serious incident in your charity (2017; updated 2019).
- Mental health and behaviour in schools guidance (2018)
- Sharing nudes and semi-nudes: Advice for education settings working with children and young people Responding to incidents and safeguarding children and young people (2024)
- Criminal exploitation of children and vulnerable adults: county lines (2023)
- New Definition of Extremism (2024)
- Working Together to Improve School Attendance (2024)

Annex B of *Keeping Children Safe in Education 2024* also contains links to additional guidance and resources that staff may find useful to refer to.

APPENDIX 3: 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 C 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 them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations; The College will ensure any pupil has access to an appropriate adult in accordance with PACE code C 2019 (usually a parent, guardian or social worker)
- liaise with the Chair of the Safeguarding and Welfare Committee, the Boarding Welfare and Online Safety Council member and the EYFS Council member when appropriate.
- as required, liaise with the Case Manager and the Local Authority Designated Officer 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.
- Act as a point of contact with the safeguarding partners
- Liaise with the Senior Mental Health Lead/Mental Health Team for safeguarding concerning mental health
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Work with the Head and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes:

- o   ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
- o   supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

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 people susceptible to radicalisation* 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;
- 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; and

- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

APPENDIX 4: SAFEGUARDING EXPECTATIONS FOR EXTERNAL HIRE/USE OF COLLEGE PREMISES

This appendix outlines the safeguarding expectations for all parties involved when Clifton College hires out its premises to external organisations. Setting clear expectations is crucial to ensure the safety and well-being of children and vulnerable individuals who may be present during these events. By defining the responsibilities of the College, hirers, and staff, this framework promotes a proactive approach to safeguarding, facilitates communication, and enables a swift response to any potential concerns. Ultimately, establishing these expectations helps to create a secure and protected environment for all users of the College's facilities. Additionally, the College will set out its expectations in relation to both regulated and unregulated activity for hirers.

Regulated activity
Regulated activity is defined as a person who has frequent or intensive contact with children or vulnerable adults because of their work in a specific place. This includes people who manage those who undertake regulated activity.

For the avoidance of any doubt, a person is considered in regulated activity -
- for any overnight activity, even if this only happens once.
- if they are responsible for the supervision of children on 3 or more occasions over a 30 day period
- If a person is engaged in work for or in connection with the purposes of the establishment (i.e. That person works at a school or youth club or has access to sensitive data relating to children, even if that person does not work directly with children); and
- If it gives the person the opportunity, in their work, to have contact with children

Unregulated Activity
An unregulated activity means that although the person's work may involve contact with children or young people, it does not meet the requirements for it to be considered regulated activity.

The College may on occasion make allowances on the above providing it is within the requirement of the regulated activity scope set out by HM Government

The College will:
- Ensure that all hirers are aware of and understand the College's Safeguarding and Protecting Children Policy.
- Conduct appropriate checks on hirers, including obtaining necessary documentation such as insurance, risk assessments, and DBS checks for individuals working with children.
- Designate a member of staff to be the point of contact for the hirer and to oversee the event or activity.
- Ensure that the hired premises are safe and suitable for the intended use.
- Respond promptly and appropriately to any safeguarding concerns raised during the hire period.
- Provide appropriate boundary maps for hiring organisations where appropriate.

- Provide clear instructions to the hirers regarding the use of the premises and expectations for conduct.
- Ensure that all hirers are kept safe through randomised checks of hirers records during the hire period
- Ensure those who are in unregulated and regulated activity on its premises are clear about the expectations regarding their access to areas of the premises
- Request assurance to ensure those in regulated activity are appropriately recruited and trained

Hirers must:
- Comply with the College's Safeguarding and Protecting Children Policy and all other relevant policies and procedures.
- Ensure that all individuals working with children have undergone appropriate safeguarding training and hold valid DBS checks where required.
- Provide the College with a risk assessment for the event or activity and will implement appropriate measures to mitigate any identified risks.
- Report any safeguarding concerns to the designated College staff member immediately.
- Hirers will ensure that their activities are conducted in a safe and appropriate manner and that the welfare of children is paramount.
- Follow all reasonable instructions given by the College regarding the use of the premises and conduct during the hire period.
- Have in place all policies and procedures that are necessary to meet their own regulatory obligations (if any) in respect of their work with children
- Allow designated staff to inspect records when requested throughout their hiring period
- Ensure all adults have been appropriately checked including safer recruitment checks for those in regulated activity

Clifton College Education Group Staff must:
- Be aware of the College's Safeguarding and Protecting Children Policy and procedures for reporting concerns.
- Report any safeguarding concerns observed during the hire period to the designated College staff member immediately.
- Cooperate with hirers to ensure the safety and welfare of children.
- Maintain appropriate boundaries with children and young people involved in the hired activity.
- Follow the established process for organisations to hire from the College, ensuring all necessary checks and procedures are completed.

This appendix is intended to provide a framework for safeguarding expectations during external hire of College premises. It should be read in conjunction with the College's full Safeguarding and Protecting Children Policy and other relevant policies.