

# SAFEGUARDING & CHILD PROTECTION POLICY

including Early Years Foundation Stage (EYFS)



Last reviewed:	August 2023
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Responsibility:	Deputy Head (Pastoral)
Governance:	Education / Mrs Alison Morton: Approved 06/10/23

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**Plymouth LA Prevent Duty Co-ordinator:** Candice Sainsbury Tel: 01752 307387

**Plymouth Adult Social Care:** 01752 306900

**Independent Reviewing Service:** 01752 306366

**DfE Helpline:** 0207 340 7264, Piccadilly Gate, Stove Street, Manchester, M1 2WD

**Police Non-urgent issues:** 101      **Police Emergency issues:** 999

**Plymouth Safeguarding Children Partnership Guidance:**  
[www.plymouth.gov.uk/localsafeguardingchildrenboard.htm](http://www.plymouth.gov.uk/localsafeguardingchildrenboard.htm)

**Radicalisation Advice:** [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

**South West Child Protection Policy:** <https://www.proceduresonline.com/swcpp/>

**Child Abuse Whistleblowing helpline for staff:** 0800 028 0285 [help@nspcc.org.uk](http://help@nspcc.org.uk)

### **Relevant documents:**

- Keeping Children Safe in Education (September 2023) [Keeping children safe in education 2023 - Statutory guidance for schools and colleges - GOV.UK](#)
- Statutory Framework for the Early Years Foundation Stage Sept 2021 [Statutory framework for the early years foundation stage](#)
- The DfE: [Sexual violence and sexual harassment between children in schools and colleges](#)
- Working Together to Safeguard Children (WT) July 2018 [Working Together to Safeguard Children 2018](#)
- The Children Act 2004 [Children Act 2004](#)
- Information Sharing, July 2018 [Information sharing: advice for practitioners](#)
- DBS [www.gov.uk/disclosure-barring-service-check/overview](http://www.gov.uk/disclosure-barring-service-check/overview)
- UKCCIS entitled "Sexting in schools and colleges" [Sexting in schools and colleges - GOV.UK](#)

- Mental Health & Behaviour in Schools [Mental health and behaviour in schools](#)
- Section 5157 Education Act 2002
- Handbook for the Inspection of School (September 2016) including the NMS for Boarding Schools.
- DfE Preventing and Tackling Bullying July 2017 [Preventing and tackling bullying](#)
- The Prevent Duty – Departmental advice for schools and childminders (June 2015) [Advice template](#)
- Channel Awareness online training [Channel General Awareness e-learning](#)
- Disqualification under the Childcare Act 2006 (Sept 2018) [Home Disqualification under the Childcare Act 2006](#)
- Mental Health & Behaviour in Schools (Nov 2018) [Mental health and behaviour in schools](#)
- Counselling in Schools (Feb 2016) [Advice template](#)
- Equality Act 2010 <https://www.gov.uk/guidance/equality-act-2010-guidance>
- Children Missing Education 2016 - Statutory Guidance [Stat guidance template](#)
- Independent Schools Standards Regulations (ISSRs) 2019 [The Independent School Standards - Guidance for independent schools](#)
- Teaching Regulation Agencies' 'Teacher misconduct – the prohibition of teachers' (October 2018) [Teacher misconduct: the prohibition of teachers](#)
- Home Office's Preventing youth violence and gang involvement [Preventing youth violence and gang involvement - Practical advice for schools and colleges](#)
- Criminal exploitation of children and vulnerable adults: county lines guidance [Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)
- [County Lines Toolkit for Professionals - Children & Young People Trafficked for the Purpose of Criminal Exploitation in Relation to County Lines – A toolkit for professionals](#)
- Multi Agency Guidance on FGM July 2020 [HM Government - Multi-agency statutory guidance on Female Genital Mutilation](#)

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## Introduction

School staff are uniquely placed to observe changes in children's behaviour and the outward signs of abuse. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that the school has a culture of detection and reporting i.e. both pupils and

school staff are alert to the signs of abuse and understand the procedures for reporting their concerns.

The Children Act 2004 and the Independent Schools Standards Regulations place a duty on our school to safeguard and promote the well-being of our pupils. All teachers and support staff are expected to be competent and safe to work with our young people. The school also aligns its practice closely with the Plymouth Safeguarding Children's Board guidance.

Plymouth College's core safeguarding principles:

- To safeguard and promote the welfare of children is of paramount importance
- Safer children make more successful and happy learners
- Policies will be reviewed annually, unless an incident or new legislation or guidance suggests the need for an interim review.
- Plymouth College will work closely with the Plymouth Safeguarding Children Board and the Plymouth LADO.
- The school has a culture of detection and reporting.
- The staff understand that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- Pupils and staff involved in child protection issues will receive appropriate support.
- All staff will have appropriate training.

## **Policy aims**

- to provide all staff with the necessary information to enable them to meet their child protection responsibilities and know how to report issues.
- to ensure consistent good practice throughout all staff and pupil communities.
- to demonstrate the school's commitment with regard to child protection to pupils, parents and other partners
- to contribute to the school's safeguarding portfolio by being alert to child welfare and safety issues and reporting them without delay.
- to work closely with Plymouth College will work closely with the Plymouth Safeguarding Children Board and the LADO.

## **Child protection statement**

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

The procedures contained in this policy apply to all staff, volunteers and governors and are consistent with those of Keeping Children Safe in Education (2023)

## Policy principles

- Welfare of the child is paramount – our approach is child-centred and the key is always what is in the best interests of the child
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm
- Pupils and staff involved in child protection issues will receive appropriate support and be aware of the source of child protection procedures
- Whenever an allegation or disclosure of abuse has been made the school will communicate with a local safeguarding agency
- No one professional can have a full picture of a child's needs but we all have a role to play in identifying concerns, sharing information and taking prompt action.

Staff should therefore have shared knowledge, experience and feelings in relation to child abuse work from various disciplines and agencies and understand the responsibilities and roles of other agencies

- Early help can prove crucial in helping vulnerable pupils so staff should be particularly concerned to monitor pupils so as identify needs and be alert to the signs of child abuse and what to do what action to be taken
- The 'Data Protection Act (2018)' is not a barrier to sharing information where failure to do so would result in a child being placed at harm. The interests of the child are paramount.
- Staff should consider the practical skills associated with anti-discriminatory assessment, professional judgement and decision-making
- Staff should recognise and manage feelings and beliefs which might inhibit them from recognising the problem
- Staff should recognise and be able to work with a diverse range of models of parenting and family life

## Terminology

**Safeguarding** and promoting the welfare of children refers to the overarching process of protecting children from abuse or neglect, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

**Child protection** refers to the specific processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

**Duty of Care** refers to the duty upon the school to ensure that reasonable steps are taken to ensure the safety of a child during any activity for which the school is responsible. All adults in charge have a moral and legal duty to show this duty of care.

**Staff/ adult** refers to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity.

**Child/ young person** refers to all young people who have not yet reached their 18th birthday.

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

**Disclosure** – when a child tells you or lets you know in some other way that he or she has been or is being abused. Disclosures can be direct, indirect or third party. Disclosures do not need to be proved or validated in order to be acted upon.

**LSCB** refers to the Local Safeguarding Children Board

**LADO or Designated Officer** refers to the Local Authority Designated Officer

**KCSiE** refers to Keeping Children Safe in Education (2023)

## **Roles and responsibilities**

All schools must nominate a senior member of staff to hold the post of Designated Safeguarding Lead and coordinate child protection arrangements. They will be supported by at least one Deputy Designated Safeguarding Lead who is trained to the same level and, in the absence of the designated person, carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the designated person, the deputy will assume all of the functions above. One of these members of staff should always be available to staff to discuss safeguarding concerns.

## The Designated Safeguarding Lead - Charles Irish (Deputy Head) 01752 505110:

- Both the DSL and DDSL's undergo training at least every two years in order to provide them with the knowledge and skills to carry out their role. Both the DSL and DDSL's will also attend refresher updated at regular intervals, as required, but at least annually to ensure that they remain conversant with best practice and to keep up with developments relevant to their role. They both have a job description for their safeguarding roles and key activities
- acts as a source of support and expertise to the school community
- has an understanding of Plymouth SCB procedures and has regular contact with the LADO team to ensure that procedures are correct and up to date.
- keeps written records of all concerns, ensuring that such records are stored securely and flagged on, but kept separate from, the pupil's general file. Access is restricted to the safeguarding team and the Head
- refers cases of suspected abuse to children's social care or police as appropriate
- notifies children's social care if a child with a child protection plan is absent for more than two days without explanation
- is aware of the local procedures for making Prevent referrals and notifies the Prevent Duty Co-ordinator should there be a concern over the actions of a child
- refers cases to Channel and Prevent Programme when appropriate and support staff who do the same
- ensures that when a pupil with a child protection plan leaves the school, their information is passed to their new school and the pupil's social worker is informed
- understands how to keep children safe who are looked after by the Plymouth, Devon or Cornwall LA
- attends and/or contributes to child protection conferences
- coordinates the school's contribution to child protection plans
- develops effective links with relevant statutory and voluntary agencies
- ensures that all staff have read and understood the safeguarding/child protection policy
- ensures that the safeguarding/child protection policy is updated annually
- liaises with the nominated governor and Head as appropriate
- be aware of the requirement for children to have an Appropriate Adult during police investigations and section 47 enquiries
- keeps a record of staff attendance at child protection training
- ensures that any weaknesses or deficiencies in the school safeguarding/child protection policy are remedied without delay using appropriate action
- makes the safeguarding/child protection policy available to parents and pupils via the internet
- has oversight of online safety and understand the filtering and monitoring systems and processes in place
- the EYFS Designated Person has attended the EYFS Safer Recruitment Workshop
- help the governing body carry out the annual review of the school's safeguarding policies
- ensures that the child protection file is passed on to a pupil's new school
- Refer all cases of suspected abuse to the local authority SCB (Gateway in Plymouth) and:
  - The local authority designated officer (LADO) for child protection concerns involving a staff member);
  - Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or
  - Police (cases where a crime may have been committed).
  - Social services for ongoing or well established issues
  - Support staff who make referrals to Children's Social Services



- He / she will be supported by deputy designated safeguarding leads with one taking special responsibility for Early Years.

The DSL should act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

## **Training**

The DSL should receive appropriate training, in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment procedures
- 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 school's child protection policy and procedures, especially new and part time staff
- Be alert to the specific needs of children in need, those with special educational needs and young carers
- Be able to keep detailed, accurate, secure written records of concerns and referrals
- 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 school or college may put in place to protect them
- Have a working awareness of the Prevent Strategy

## **Raising Awareness**

The DSL should:

- ensure the school's policies are known and used appropriately:
- ensure the school's Safeguarding & Child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the Safeguarding & Child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- ensure that when children leave Plymouth College to continue education elsewhere, we copy their safeguarding file and send it to their new school or college as soon as possible, (but within 5 days latest). It should be transferred separately from the main pupil file.
- 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.

- ensure that all induction training includes:
  - o School Safeguarding & Child protection policy
  - o Part 1 (and Part 5 if a teacher) of the KCSIE 2023 document
  - o Staff code of conduct
  - o Identities of the DSL and DDSL
  - o The School Whistleblowing Policy

**The Governing body** ensures that the school has:

- A whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. Where there is a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- a DSL for child protection who is a member of the senior leadership team with sufficient time to dedicate to the role and who has, in addition to standard child protection training, undertaken training in inter-agency working, radicalisation and serious case reviews.
- a safeguarding/child protection policy and procedures that are consistent with PTSCP requirements, reviewed annually and made available to parents on request.
- procedures for dealing with allegations of abuse made against members of staff including allegations made against the Head.
- safer recruitment procedures that include the requirement for appropriate checks.
- a training strategy that ensures all staff, including the Head, receive child protection training, with refresher training at three-yearly intervals. The DSL should receive refresher training at two-yearly intervals.
- makes arrangements to ensure that all temporary staff and volunteers are made aware of the school's arrangements for child protection.
- undertaken an annual review of the school's safeguarding/child protection policies, along with case studies, and ensure that all duties are efficiently discharged and correct inter-agency cooperation occurs.
- Provided an annual report, from the DSL and nominated governor, and that the content of the review of the report is minuted in governors' meetings

The governing body has a nominated member (**Alison Morton**) who is responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Head. This nominated governor will also regularly check on the implementation of the safeguarding/child protection policy and the staff's awareness of procedures and how pupils are taught about safeguarding.

The Governing Body should ensure that **all** governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

The Governing body should ensure the school's IT systems has appropriate filters and monitoring systems in place and regularly review their effectiveness. This is to ensure possible exposure to Child Abuse and Terrorist Content is minimised

The governing body should consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through personal, social, health and economic education. Safeguarding issues are discussed at the termly Prep School governors meeting and the Governors will ensure that the experiences and expertise of staff is used when shaping safeguarding policies. They will also ensure that children are taught about safeguarding, including online, as part of their broad and balanced curriculum.

All governors have Enhanced Disclosure and Barring Service checks.

The governing body consults with the Head and LADO in cases possibly needing suspension of a member of staff.

The governing body will nominate a member (normally the chair) to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Head. This governor will report directly to the local authority.

Where governing bodies hire or provide college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) appropriate arrangements will be put in place to keep children safe.

When services or activities are provided by the governing body, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body should therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate. The governing body should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

### **The Head:**

- ensures that the safeguarding/child protection policy and procedures are implemented and followed by all staff
- allocates sufficient time and resources to enable the DSL and deputy to carry out their roles effectively,
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures
- Ensures that the safeguarding/child protection policy is reviewed annually including the efficiency by which the related duties have been discharged
- ensures that pupils' safety and welfare is addressed through the curriculum
- consults the Chair of Governors and LADO in any case that might require suspension of a member of staff

## All school staff:

- place the safety and welfare of pupils above all other considerations - staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. It should be clear this is everyone's responsibility.
- sign to confirm they have received, read and understood a copy of the
  - Part 1 (and Part 5 if a teacher) of the revised KCSIE 2023 document.
  - Safeguarding/child protection policy
  - Behaviour Policy
  - Staff ICT Acceptable Use Policy
  - Staff Code of Conduct
- Should receive training on and be aware of school policies on online Safety (E-Safety policy) which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- know who the DSL and Deputy DSL's are
- treat all members of the school community, including pupils, parents, colleagues and governors with consideration and respect
- adhere to the principles and procedures contained in the policies in our safeguarding portfolio and in teaching and learning policies
- treat each pupil as an individual and make adjustments to meet individual need
- demonstrate a clear understanding of and commitment to non-discriminatory practice
- recognise the power imbalances between pupils and staff and ensure that power and authority are never misused
- understand that school staff are in a position of trust and that sexual relationships with a pupil, even over the age of 16, may be an offence (see full statement below)
- be alert to, and report appropriately, any behaviour that may indicate that a pupil is at risk of harm or radicalisation
- encourage all pupils to reach their full potential
- never condone inappropriate behaviour by pupils or staff
- take responsibility for their own continuing professional development
- refrain from any action that would bring the school into disrepute
- ensure that their behaviour and actions do not place themselves or pupils at risk of harm or allegations
- value themselves and seek appropriate support for any issue that may have an adverse effect on their professional practice.
- All staff should know the procedures for reporting any child protection issue and dealing with a pupil going missing (whether a day pupil or a boarder) (Appendix 3)
  
- In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent. It is also important that staff know that if there is a suspicion of any form of abuse regarding a child, regardless of age, this must be reported to the DSL immediately for a referral to be made to children's social care. If you cannot speak to the DSL or Deputy DSL, you are encouraged to contact children's social care directly. The law also says anyone under the age of 13 can never legally give consent. This means that anyone engaging in sexual activity with a child who is 12 or younger will be subject to penalties set out under the Sexual Offences Act 2003.

Staff should also be aware that any abuse involving a child of any age must be reported immediately to the DSL. Staff can also go direct ...

"Where staff have concerns that a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. **Anyone** can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL that a

referral has been made as soon as possible. Staff must share information with children's social care and/or the police where there are any concerns that a child may be at risk of harm or neglect.

### **Record keeping**

**All** concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

### **Why is all of this important?**

It is important for children to receive the right help at the right time to address safeguarding risks, prevent issues escalating and to promote children's welfare. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action. Working Together to Safeguard Children. Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect;
- poor record keeping;
- failing to listen to the views of the child;
- failing to re-assess concerns when situations do not improve;
- not sharing information with the right people within and between agencies;
- sharing information too slowly; and
- a lack of challenge to those who appear not to be taking action.

### **Good practice guidelines**

Guidelines for all staff regarding good practice in safeguarding children – good practice includes:

- never assume someone else is dealing with it
- involving pupils in decisions that affect them
- encouraging positive and safe behaviour among pupils
- never condone inappropriate behaviour by pupils or staff
- being a good listener
- being alert to changes in pupils' behaviour
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the school's child protection policy and guidance documents on wider safeguarding issues, for example bullying, cyberbullying, e-safety etc.
- adhering to all policy principles
- asking the pupil's permission, where appropriate (certainly Year 3 and above), before doing anything for them of a physical nature, such as assisting with dressing, physical support during PE or administering first aid
- taking appropriate care when physically restraining a pupil

- maintaining appropriate standards of conversation and interaction with and between pupils and avoiding the use of sexualised or derogatory language
- taking appropriate care when undergoing 1:1 tuition or coaching, corresponding by electronic communication methods and travelling by car with pupils
- leaving the classroom/office door open if involved in one to one communication with a child
- understanding that under no circumstances should staff communicate directly with pupils on Facebook or other social media sites any electronic communication between staff and pupils/parents should be through the school communication system
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse.
- Understanding that staff are in a position of trust and inappropriate relationships with a pupil may be an offence

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent. Staff should also be aware that any abuse involving a child under the age of 13 must be reported immediately to the Designated Safeguarding Lead.

All staff should know the procedures for reporting any child protection issue and dealing with a pupil going missing (whether a day pupil or a boarder) (Appendix 3)

All staff must read the policy and good practice guidelines and sign a form to confirm that they have done this (Appendix 1)

Assurance will be obtained that appropriate Child Protection checks and procedures apply to any staff employed by another organisation and working with school's pupils on another site.

## **Multi - Agency Child Safeguarding Arrangements**

The department has published Working Together Transitional Statutory Guidance to support Local Safeguarding Children Boards (LSCBs), the new safeguarding and child death review partners, and the new Child Safeguarding Practice Review Panel in the transition from LSCBs and serious case reviews (SCRs) to a new system of multi-agency arrangements and local and national child safeguarding practice reviews. Locally, **the three safeguarding partners** (*the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for a police area in the local authority area*) will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs.

The safeguarding partners for Plymouth are:

- 1. Plymouth City Council**
- 2. NHS Devon Clinical Commissioning Group**
- 3. Devon and Cornwall Police**

Governing bodies, proprietors, management committees and their senior leadership teams, especially their designated safeguarding leads, should be aware of their local arrangements and timelines for the transition.

**The new arrangements will be referred to as the Plymouth Safeguarding Children Partnership (PSCP).** If you are concerned about a child in Plymouth then please still contact the Gateway as is usual on 01752 66800 (option 1) or [gateway@plymouth.gov.uk](mailto:gateway@plymouth.gov.uk).

The Local Authority Designated Officer (LADO) arrangements for Plymouth remains as before

- The arrangements have been published and further detail can be found at <http://www.plymouthscb.co.uk/masa/new-multi-agency-safeguarding-arrangements-published/>
- It is proposed that within Plymouth there shall be an Educational Group, chaired by a Head Teacher representative, to provide a forum for discussing performance, peer scrutiny and support, new legislation and policy. It is emphasised that the arrangements remain subject to ongoing conversations between us, as safeguarding partners, and your agency.

Working Together to Safeguard Children 2018 (WTG 18) is the statutory guidance that transfers strategic local safeguarding arrangements from Local Safeguarding Children Boards (LSCB) to three new safeguarding partners, namely the Local Authority, Clinical Commissioning Groups and Police.

These safeguarding partners have a shared and equal duty to determine local arrangements to work with each other, and with nominated relevant agencies, to safeguard and promote the welfare of all children and young people in their area.

The current Independent Chair role will be replaced with a single Independent Quality Assurance role that has oversight for reviewing and improving safeguarding practice. This role shall ensure the Joint Strategic Partnership enhances the identification of learning and embeds outcomes into practice across Plymouth.

## **Operation Encompass**

The school is a member of Operation Encompass which ensures that the school is informed by the police of any call out they have made to the home of a pupil the night before.

The officers who can receive an Operation Encompass call are the DSL and the Deputy DSL's including the Head of Early Years.

In addition, Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

## **Early Help Assessment Tool (EHAT) / Formerly known as CAF (Common Assessment Framework)**

The school may work alongside other agencies to draw up an Early Help Assessment (EHAT) in cases where there are concerns about children's welfare. This helps ensure that early intervention can prevent a child's situation deteriorating. The school will aim to identify pupils who may benefit from early help. If the early help does not help the situation improve a referral will be made to Children's Social Services.

## **WHAT SCHOOL STAFF SHOULD KNOW, LOOK OUT FOR & DO**

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

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

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

We need to recognize that SEND pupils often have a higher level of vulnerability to abuse.

**Physical abuse:** 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.

**Emotional 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 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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities,



encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect:** 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.

## Specific safeguarding issues

**All** staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos<sup>9</sup> can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

- child sexual exploitation (CSE) – see also below
- child criminal exploitation (CCE) – see also below
- bullying including cyberbullying
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) – see also below
- forced marriage (Resource – The Right to Choose: Government Guidance on Forced Marriage [The right to choose: government guidance on forced marriage - GOV.UK](#))
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- mental health
- private fostering
- radicalisation
- sexting
- serious violence
- teenage relationship abuse
- trafficking
- Prevent radicalisation
- Honour based violence / abuse (may include non-violent forms of abuse)
- Children missing education
- Hate
- Missing children
- Child-on-child abuse (eg sexting, bullying of any kind) should never be tolerated as 'banter', or as part of an initiation process.

**All** staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- upskirting (any gender can be a victim)
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

## **Child Sexual Exploitation & Child Criminal Exploitation (CSE & CCE)**

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Some specific forms of **Child Criminal Exploitation** CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. 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 professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

**Child sexual exploitation (CSE)** is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

## **Key indicators of child sexual exploitation include:**

### **Health**

- Physical symptoms (bruising suggestive of either physical or sexual assault);
- Chronic fatigue;
- Recurring or multiple sexually transmitted infections;
- Pregnancy and/or seeking an abortion;
- Evidence of drug, alcohol or other substance misuse;
- Sexually risky behaviour.

### **Education**

- Truancy/disengagement with education or considerable change in performance at school.
- Emotional and Behavioural Issues
- Volatile behaviour exhibiting extreme array of mood swings or use of abusive language;
- Involvement in petty crime such as shoplifting, stealing;
- Secretive behaviour;
- Entering or leaving vehicles driven by unknown adults;
- Reports of being seen in places known to be used for sexual exploitation, including public toilets known for cottaging or adult venues (pubs and clubs).
- Identity
- Low self-image, low self-esteem, self-harming behaviour, e.g. cutting, overdosing, eating disorder, promiscuity.
- Relationships
- Hostility in relationships with staff, family members as appropriate and significant others;
- Physical aggression;
- Placement breakdown;
- Reports from reliable sources (e.g. family, friends or other professionals) suggesting the likelihood of involvement in sexual exploitation;
- Detachment from age-appropriate activities;
- Associating with other young people who are known to be sexually exploited;

### **Known to be sexually active;**

- Sexual relationship with a significantly older person, or younger person who is suspected of being abusive;
- Unexplained relationships with older adults;
- Possible inappropriate use of the Internet and forming relationships, particularly with adults, via the Internet;
- Phone calls, text messages or letters from unknown adults;
- Adults or older youths loitering outside the home;
- Persistently missing, staying out overnight or returning late with no plausible explanation;
- Returning after having been missing, looking well cared for in spite of having no known home base;
- Missing for long periods, with no known home base;
- Going missing and being found in areas where they have no known links.

**Please note:** Whilst the focus is often on older men as perpetrators, younger men and women may also be involved and practitioners should be aware of this possibility.

### **Social Presentation**

- Change in appearance;
- Going out dressed in clothing unusual for them (inappropriate for age, borrowing clothing from older young people).

- Family and Environmental Factors
- History of physical, sexual, and/or emotional abuse; neglect; domestic violence; parental difficulties.
- Housing
- Pattern of previous street homelessness;
- Having keys to premises other than those known about.
- Income
- Possession of large amounts of money with no plausible explanation;
- Acquisition of expensive clothes, mobile phones or other possessions without plausible explanation;
- Accounts of social activities with no plausible explanation of the source of necessary funding.

## **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That 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.

## **Indicators of abuse – what you might see**

**Physical signs** define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they ‘tell’. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated person.

- Remember, it is your responsibility to report your concerns. It is not your responsibility to investigate or decide whether a child has been abused.
- It is important to know that if there is a suspicion of any form of abuse regarding a child, regardless of age, this must be reported to the DSL immediately for a referral to be made to children’s social care. If you cannot speak to the DSL or Deputy DSL, you are encouraged to contact children social care directly.
- The law says anyone under the age of 13 can never legally give consent. This means that anyone engaging in sexual activity with a child who is 12 or younger will be subject to penalties set out under the Sexual Offences Act 2003.

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other’s safety
- self-harm
- frequently miss school or arrive late

- show signs of not wanting to go home
- run away from home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age.

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

If you notice signs that worry you or, following a conversation with the child, you remain concerned, you should take action.

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

Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the mental health and behaviour in schools’ guidance [Mental health and behaviour in schools](#) colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See Rise Above for links to all materials and lesson plans.

## **Listening to children**

The school provides opportunities for listening to children in the following ways:

- School council
- Strong pastoral care which allows pupils to talk to any teachers about their concerns
- Circle time
- Form Discussions
- PSHE
- The senior management have an open door policy for pupils
- Prefects encouraged to be listeners
- Support staff
- IEP’s and EYFS profiles
- Anti-bullying ambassadors

- Occasional questionnaires
- Discussions and debates in lessons
- Appropriate trusted staff for LGBT students who they feel they can talk to

## **Impact of abuse**

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

## **WHAT TO DO IF YOU ARE WORRIED A CHILD IS BEING ABUSED**

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is very important that you report your concerns – you do not need ‘absolute proof’ that the child is at risk. The school has a very easy to use reporting system to encourage all members of the school community to report concerns. If a child is reported missing from school, staff should take action immediately.

Key points to remember for taking action are:

- is the child suffering or likely to suffer significant harm?
- is the child in need of extra support from an external agency?
- report your concern to the DSL **by the end of the day** or the Deputy DSL if the DSL is away
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a “**Cause for Concern**” form and submit this to the DSL / Deputy DSL
- seek support for yourself if you are distressed.
- it is important to know that if there is a suspicion of any form of abuse regarding a child, regardless of age, this must be reported to the DSL immediately for a referral to be made to children’s social care. The law says anyone under the age of 13 can never legally give consent. This means that anyone engaging in sexual activity with a child who is 12 or younger will be subject to penalties set out under the Sexual Offences Act 2003.
- If you cannot speak to the DSL or Deputy DSL, you are encouraged to contact children’s social care directly.

Appendix 4 provides a flowchart for reporting a concern. Appendix 3 provides a procedure to follow should a day pupil or boarder be reported missing.

## **If a pupil discloses to you – how to act**

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen

if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a pupil talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on if you have any concerns – as a teacher, you are not allowed to keep secrets or maintain confidentiality. The point at which you do this is a matter for professional judgement. If you jump in immediately the pupil may think that you do not want to listen, if you leave it till the very end of the conversation, the pupil may feel that you have misled them into revealing more than they would have otherwise.

### **During your conversation with the pupil:**

- Allow them to speak freely.
- Remain calm and do not overreact – the pupil may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
- Do not be afraid of silences – remember how hard this must be for the pupil.
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil’s mother think about all this.
- At an appropriate time tell the pupil that in order to help them you must pass the information on.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Avoid admonishing the child for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be your way of being supportive but the child may interpret it that they have done something wrong.
- Only note any injuries that are normally visible on a child’s body but do not investigate further.
- Tell the pupil what will happen next. The pupil may agree to go with you to see the designated person. Otherwise let them know that someone will come to see them before the end of the day.
- Report verbally to the designated person.
- Write up your conversation as soon as possible on the Cause for Concern form and hand it to the DSL (or deputy in their absence).
- Seek support if you feel distressed.

Remember - If a member of staff is unhappy with the response from the DSL they should go to the DDSL or the EYFS designated person. If they still feel dissatisfied with the response they should contact the Gateway. It is important to note that any staff member can refer their concerns to children’s social care directly.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also, important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

## **Procedures for a child missing from education**

Plymouth College will follow safeguarding procedures (as outlined in Appendix 3 & 3A of this Policy) when dealing with children who go missing to help prevent risks of abuse, neglect, radicalisation and sexual exploitation.

All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

A child going missing from education is a potential indicator of abuse or neglect. School and college staff should follow the school's or college's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

Schools should put in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

The law requires all schools to have an admission register and, with the exception of schools where all pupils are boarders, an attendance register. All pupils must be placed on both registers.

**All schools must inform their local authority of any pupil who is going to be deleted from the admission register where they:**

- have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- have been permanently excluded.

The local authority must be notified when a school is to delete a pupil from its register under the above circumstances. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

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



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

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Further information and support, includes:

Guidance on school attendance 'Working together to improve school attendance' including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.

## **Child-on-child Abuse (or sometimes known as child on child abuse)**

**All** staff should be aware that children can abuse other children (often referred to as child-on-child abuse). And that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

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.

All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy).

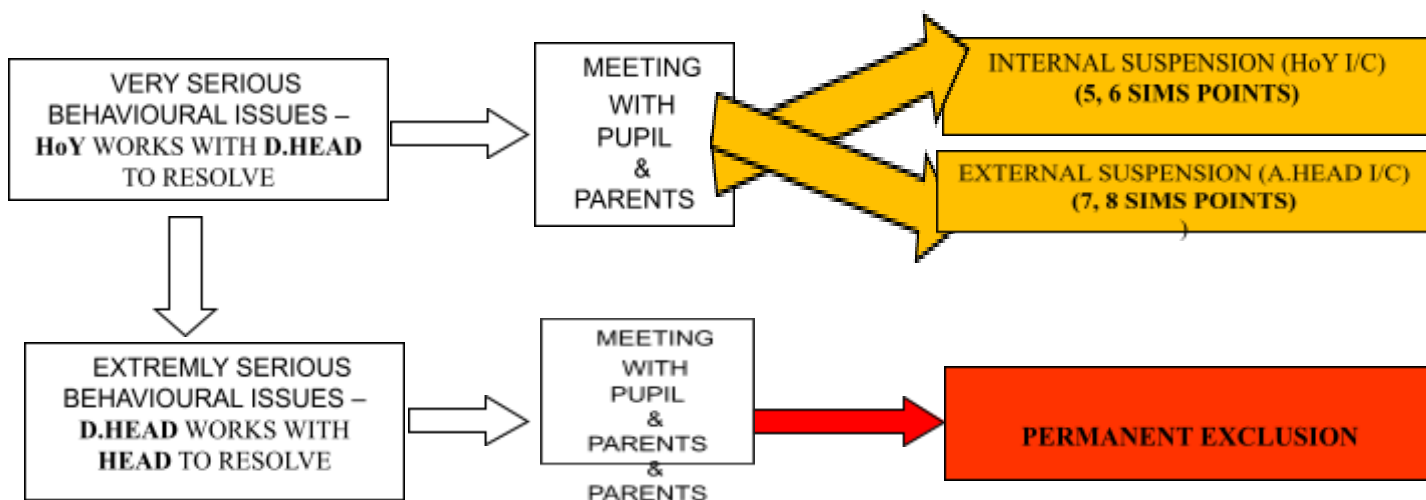
It is essential that **all** staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures. Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);

- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- 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;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, 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 (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All allegations of child-on-child abuse will be reported to the DSL who will record, investigate and deal with them as set out in the behaviour management policy and anti-bullying policy. Child-on-child abuse will be viewed very seriously and is likely to be deemed as a very serious or extremely serious behavioural issue. Please see below for key procedures for dealing with such behaviour.



Examples of offences which may lead to temporary or permanent exclusion (SIMS 5-8) include:
<ul style="list-style-type: none"> <li>• Repeated use of tobacco related products. (ref abuse of alcohol &amp; tobacco policy)</li> <li>• Abuse of alcohol or drugs. (ref policies on drugs and abuse of alcohol &amp; tobacco)</li> <li>• Supply or distribution of drugs, legal highs or other related substances.</li> <li>• A very serious breach of the ICT Code of Conduct</li> <li>• Assault</li> <li>• Possession and/or use of offensive weapons (ref offensive weapons policy)</li> <li>• <b>Bullying (ref anti-bullying policy) and child-on-child abuse.</b></li> <li>• Actions which endanger the safety of others</li> <li>• Bringing the school name into disrepute</li> <li>• Inappropriate <b>sexual conduct (violence, harassment, sexting, upskirting)</b></li> <li>• Theft</li> <li>• Vandalism or wilful damage to school property</li> <li>• Repeated or persistent low level disruption in class or activities</li> </ul>

In all cases of pupil on pupil abuse, both children should be treated as ‘at risk’. There is a recognition of the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boy’s perpetrators), but that all child-on-child abuse is unacceptable and will be taken seriously.

The management of children and young people with sexually harmful behaviour is complex and the school will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator.

If a member staff feels that there is a risk of significant harm to any pupil resulting from the inappropriate actions of another pupil, they must report this to the DSL immediately so that a referral can be made to the relevant external agency. As in all cases of concern, if you cannot speak to the DSL or Deputy DSL, you are encouraged to contact children's social care or another relevant external agency directly.

Children with **special educational needs (SEN) and disabilities** can face additional safeguarding challenges. All staff must recognise that additional 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.

Additional pastoral support for more vulnerable children with SEND will be made available if possible and when appropriate.

Minimising risk - Assemblies given on Anti bullying / child-on-child abuse making it clear that it is unacceptable and easy for pupils to report it. Plymouth College Principle of Respect reinforcing tolerance of others. Prefect and staff are vigilant

### **Supporting procedures -**

The school and its staff will offer appropriate support to children who have suffered trauma or abuse or who have abused others through:

- An individual support plan which is reviewed regularly
- Pastoral support must be offered in the form of 'team around the child',
- Working in partnership with parents, carers and other agencies as appropriate
- Providing initial counselling through the schools own trained counsellors or school nurses
- In difficult more complex cases, children will be referred to other external agencies if necessary

## **Child on child sexual violence and sexual harassment**

Part 5 of KCSIE sets out full guidance about managing reports of child on child sexual violence and sexual harassment. All staff are asked annually to sign to say that they have received, read and understood this guidance. The key elements are below.

Sexual violence and sexual harassment can occur between two children of **any age and sex**, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. As set out in Part one

of this guidance, all staff working with children are advised to maintain an attitude of **'it could happen here'**.

Plymouth College should respond to all reports and concerns of child on child sexual violence and sexual harassment, including those that have happened outside of the school or college premises, and or online.

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. The Department for Education has published detailed advice to support schools and colleges: [Sexual violence and sexual harassment between children in schools and colleges](#) and includes, what sexual violence and sexual harassment look like, important context to be aware of, related legal responsibilities for schools and colleges and advice on a whole school or college approach to preventing child on child sexual violence and sexual harassment. This part of the guidance does not attempt to provide (nor would it be possible to provide) detailed guidance on what to do in any or every particular case. The guidance provides effective safeguarding practice and principles for schools and colleges to consider in their decision making process.

Ultimately, any decisions are for the school to make on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

### **The immediate response to a report**

The school's initial response to a report from a child is important. It is essential that **all** victims are 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. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them. As per Part one of the KCSIE guidance, all staff should be trained to manage a report. (this is set out in Appendix 1c of this Policy).

Staff should note that they may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have **any** concerns about a child's welfare, they should act on them immediately rather than wait for a disclosure.

We understand that the school's initial response to a report from a child is incredibly important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

### **Risk Assessment**

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim, especially their protection and support;
- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them;

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the school or college should be actively considering the risks posed to all their pupils and students and putting adequate measures in place to protect them and keep them safe.

The designated safeguarding lead (or a deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The risk assessment at paragraph 243 is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the schools or college's approach to supporting and protecting their pupils and students and updating their own risk assessment.

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

Schools and colleges should carefully consider any report of sexual violence and/or sexual harassment. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school or college's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse;
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or school or college staff; and
- other related issues for Contextual safeguarding. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

### **Children sharing a classroom: Initial considerations when the report is made**

Any report of sexual violence is likely to be traumatic for the victim. It is essential that all victims are 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.

However, reports of rape and assault by penetration are likely to be especially difficult with regard to the victim, and close proximity with the alleged perpetrator(s) is likely to be especially distressing. Whilst the school or college establishes the facts of the case and starts the process of liaising with children's social care and the police, the alleged perpetrator(s) **should** be removed from any classes they share with the victim. The school or college should also **carefully** consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school or college premises (including during any before or after school-based activities) and on transport to and from the school, where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s).

For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing school or college premises and school or college transport, should be considered immediately.

The wishes of the victim, the nature of the allegations and the protection of all children in the school will be especially important when considering any immediate actions.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, the school should follow general safeguarding principles as set out throughout this guidance. **Immediate** consideration should be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).

The starting point regarding any report should always be that sexual violence and sexual harassment is not acceptable and will not be tolerated. Especially important is not to pass off any sexual violence or sexual harassment as 'banter', 'part of growing up' or 'having a laugh'. It is essential that all victims are 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

### **Options to manage the report**

It is important that the school consider every report on a case-by-case basis. When to inform the alleged perpetrator will be a decision that should be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, the school or college should speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop the school taking immediate action to safeguard their children, where required. There are four likely scenarios for schools and colleges to consider when managing any reports of sexual violence and/or sexual harassment.

1. Manage internally
2. Early help
3. Referrals to children's social care
4. Reporting to the Police

Whatever the response, it should be under-pinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

**All** concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the school or college, should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

### **Ongoing response**

Appropriate Safeguarding and support should be given to both the victim and the alleged perpetrator during and after this process. Further details of considerations to be taken into account by the school can be found in Part 5 of KCSIE 2023.

### **Ongoing Considerations: Victim and alleged perpetrator(s) sharing classes**

Once the DSL (or a deputy) has decided what the next steps will be in terms of progressing the report, they should **carefully consider** again the question of the victim and alleged perpetrator(s) sharing classes and sharing space at school. This will inevitably involve complex and difficult professional decisions, including considering their duty to safeguard children and their duty to educate them.

It is important each report is considered on a case-by-case basis and risk assessments are updated as appropriate. As always when concerned about the welfare of a child, the best interests of the child should come first. In all cases, schools and colleges should follow general safeguarding principles as per this guidance.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator(s) should be removed from any classes they share with the victim. The school or college should also consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school or college premises (including during before and after school-based activities) and on transport to and from school or college where appropriate. This is in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s). As per paragraph 450 of KCSIE 2023, close liaison with the police is essential.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school or college should take suitable action, if they have not already done so. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator(s) to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially other pupils).

Where a criminal investigation into sexual assault leads to a conviction or caution, the school should, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion. Where the perpetrator(s) is going to remain at the school, the principle would be to continue keeping the victim and perpetrator(s) in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

In all cases, the school should record and be able to justify their decision-making.

Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict. None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator(s). Appropriate support should be provided to both as required and consideration given to sharing classes and potential contact as required on a case-by-case basis. In all cases, the school should record and be able to justify their decision-making.

All of the above should be considered with the needs and wishes of the victim at the heart of the process (supported by parents and carers as required). Any arrangements should be kept under review.

## **Children who may be particularly vulnerable**

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions, and child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in

risk, including prejudice and discrimination, isolation, social exclusion, communication issues and a reluctance on the part of some adults to accept that abuse can occur. (This is what is intended to be meant by societal attitudes. The child might be otherwise coping but other factors lead to a concern arising. An example would be a child with autism or Asperger's being treated differently at school causing them to begin to feel differently and become vulnerable)

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

- living away from home (mainly boarders)
- do not have English as a first language.
- disabled or have special educational needs
- living in a domestic abuse situation
- affected by parental substance misuse
- asylum seekers
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- live transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity,
- religion or sexuality
- Vulnerable to radicalisation
- At risk of female genital mutilation (FGM)

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

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is 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 or from home;
- is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

### **Looked after children**

In the event of the school having a child who is looked after by the Local authority the DSL will appoint a designated teacher for ensuring the welfare of this pupil.

### **Children with a social worker**

There is a need to pay particular attention to children with a social worker and note that they will potentially be at greater risk of harm. Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine.



## **Female Genital Mutilation**

All staff now have a statutory duty to report to the police where they discover FGM appears to be carried out on a girl under 18. The DSL and Children's Social Care must also be alerted.

Indicators for FGM are:

- The family belonging to a community in which female genital mutilation is practised and are making arrangements for the girl to take a holiday
- The family arranging vaccinations
- The family planning for the girl to be absent from school
- The girl talking about a 'special procedure' taking place
- Prolonged absence from school with noticeable behaviour change on return
- Long periods away from classes or other activities with bladder or menstrual problems
- Family history of female genital mutilation

If a child has already undergone FGM, particular attention must be paid to the potential risk to other female children in the same family.

## **Serious Violence**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm
- a significant change in well-being
- signs of assault or unexplained injuries
- unexplained gifts or new possessions

Any of these could indicate that children have been approached by or are involved with, individuals associated with criminal networks or gangs.

**All** staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools is provided in the Home Office's *Preventing youth violence and gang involvement* and its *criminal exploitation of children and vulnerable adults: county lines* guidance and also the *County Lines Toolkit For Professionals* (see page 3 for link)

## **Radicalisation**

Radicalisation and recruitment of young people to radicalised groups is a mounting concern and all schools have a duty to try to prevent this happening by being aware of the signs, such as normal social withdrawal, online gaming, secretive behaviour, extremist views and use of social media sites.

## **The Prevent Duty**

Radicalisation is the process by which a young person comes to support terrorism.

Extremism is the vocal or active opposition to fundamental British values such as democracy, rule of law, mutual respect, equal opportunities, freedom of speech and tolerance of different beliefs and faiths.

Staff must be able to understand how to identify children who may be vulnerable to radicalisation and what to do to support them. This will involve a general understanding of risks affecting young people in Plymouth and the surrounding area. Consideration should be given to families, friends, internet use, specific extremist religious or political stands and changes in behaviour. The DSL, Deputy DSL and Head will have training in Radicalisation and the Prevent Duty from external agencies and internal training will be provided for staff. If staff have any suspicions of a child being vulnerable to radicalisation, then they must report this to the DSL immediately. The school will follow procedures in line with PCSB regarding referrals and contact the Prevent Co-ordinator at Plymouth LA.

The school will use the Plymouth Channel program chaired by the local authority and will aim to give support at an early stage to young people vulnerable to being drawn into terrorism and use the mechanism to make referrals. The programme is multi-agency and tailored to the individual. Engagement in the Channel programme is entirely voluntary by the individual. Plymouth College will also build children's resilience to radicalisation by promoting fundamental British Values and challenging extremist views through its PSHEE programme and assemblies. Topics such as racism, hate crimes and bullying will be included in this resilience building. Although the school would normally consult with parents, consent from parents for a referral is not required should there be a genuine risk of radicalization.

The school will ensure that children are safe from terrorist and extremist material when accessing the school internet systems by using suitable filtering systems and providing online safety tutorials and assemblies.

## **Notifying parents of concerns**

The school will normally seek to discuss any concerns about a pupil with their parents if it is deemed safe to do so. This must be handled sensitively and the DSL or Deputy DSL will decide who will make contact with the parent in the event of a concern, suspicion or disclosure. If a child is reported missing, parents will be notified as soon as an initial search of the site is complete (Appendix 3 senior school and Appendix 3A for prep school).

However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from children's social care. If there are reasonable grounds to believe that a child is at risk of harm, consent from parents for a referral is not required.

## **Confidentiality and sharing information**

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes.

The DfE document on Information Sharing states seven golden rules for information sharing:

1. The Data Protection Act (2018) is not a barrier
2. Be open and honest
3. Seek advice if in doubt without disclosing identities
4. Share with consent where appropriate but do not keep welfare issues to yourself
5. Consider safety and well-being

6. Ensure that info is necessary, relevant, accurate, secure and up-to-date
7. Keep a chronological record

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

Staff should only discuss concerns with the DSL, deputy DSL or the Head. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

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

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights
- secure

Cause for concern forms and other written information will be stored in a locked facility with the DSL and any electronic information will be password protected and only made available to relevant individuals. This will record the date, time, nature of concern, action taken to date and name of person making the record.

Chronology is important when recording safeguarding issues. All future meetings and correspondences will need to be filed. Informal notes can also be important and may be requested to be included in the evidence file. Therefore, please always keep in mind professionalism and objectivity. All paperwork is kept under lock and key in a central safeguarding file in the Deputy Heads (DSL) office.

Every effort should be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. Child protection information will be stored separately from the pupil's personal school file which will be tagged.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act (2018), which means that children and parents do not have an automatic right to see them.

## **Transition**

Where a child leaves the school and has an entry in the safeguarding central register, then the school will ensure that this information is copied and forwarded to the DSL or Head of the new establishment as soon as possible and within 5 days. The files should be sent separately to any other documentation.

When a new child registers, a request for safeguarding information will be sent to the previous school.

## **Early Years safeguarding - Transferring of child protection information**

When a child leaves an early years setting (either to move to another setting or to go to school) it is essential that arrangements are in place for the child to be protected and safe in their new environment. This means that safeguarding and child protection records should be shared promptly with the receiving setting to ensure the on-going safeguarding and well-being of the child.

Where child protection records are shared, they should be transferred separately to the child's main file/and or transfer records. Where appropriate, consent should be obtained for sharing information, however where child protection records are concerned there is likely to be a legal basis for sharing information without consent.

Information should be shared securely and ideally delivered by hand to the DSL of the receiving setting. It would be good practice to ask for confirmation when documents are received. If a child is subject to a Child Protection Plan or there are other ongoing concerns at the time of transfer, then it is strongly recommended that the transferring setting meet with the receiving DSL. This is to ensure there is an effective handover of information. Where possible, information should be shared with a receiving setting before the child starts. In all circumstances, information should be shared no later than five days after the child has started at their new setting.

If a child has an allocated social worker you must inform them if a child is leaving. Please state the name of the new setting/school. If there is no known setting/school the social worker should still be notified.

### **Reporting directly to child protection agencies**

Safeguarding is everyone's responsibility and therefore anyone can make a referral to children's social care. There should be no caveats or barriers preventing individuals from making their own direct referrals.

In an ideal situation, the Head or DSL will contact the external agencies if the situation warrants it, such as if the child is at significant risk. The Head or DSL will follow the procedures for the Common Assessment Framework to ensure Multi-Agency support if the situation warrants it. Where a child would benefit from co-ordinated support from more than one agency there should be an inter-agency assessment. This should be undertaken by a Lead Professional who could be a SENDCo, GP, family support worker, health visitor or Early Years Safeguarding and welfare Officer.

All other Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, Ofsted, police or the NSPCC if:

- the situation is an emergency and the DSL, their deputy, the Head and the designated governor for child protection are all unavailable.
- they are convinced that a direct report is the only way to ensure the pupil's safety.

### **Referral to children's social care**

- The DSL will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm from any form of abuse, regardless of age. The law says anyone under the age of 13 can never legally give consent. This means that anyone engaging in sexual activity with a child who is 12 or younger will be

subject to penalties set out under the Sexual Offences Act 2003.

- The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

### **Consent to report**

Consent is not required for a referral to statutory agencies where there are concerns about a child's safety.

### **Referral to other agencies**

For children in need of additional support, interagency cooperation will occur and where appropriate an Early Help Assessment Tool (EHAT) and Team around the Child (TAC) approach will be used.

Schools, as relevant agencies, should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements. Safeguarding partners should publish a local threshold document which includes the process for the local early help assessment and the type and level of early help services to be provided, and DSLs (and their deputies) will need to familiarise themselves with this document.

### **Bullying / Cyberbullying**

The school has an additional anti-bullying policy and an e-safety policy.

Plymouth College takes cases of bullying and cyberbullying very seriously, realising that it can cause considerable anxiety and distress.

All incidences of bullying should be reported and will be managed through our anti-bullying procedures. The subject of bullying is addressed at regular intervals in the personal, social, moral and health education (PSHEE) curriculum and through student led assemblies. A central bullying log is kept by the DSL.

### **E-Safety**

There is a separate E-safety policy available

Most of our pupils will use mobile phones and computers at some time. They are a source of fun, entertainment, communication and education. However, we know that some people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings.

The school's e-safety policy explains how we try to keep pupils safe in school. Due to the ever increasing access routes to electronic communications, our greatest emphasis is on educating young people to use electronic communication safely as well as realistic blocking and filtering of potentially harmful sites. Appropriate filters and monitoring systems are in place to keep children safe online. The School's systems are regularly checked and updated. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm.

Cyber-bullying by pupils, via texts, emails and social networking, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures. There is zero tolerance of such behaviour and the school holds the right to intervene where it deems it appropriate if any such incidents occur off the school site or beyond the school day.

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour. Some pupils will undoubtedly be 'chatting' on mobiles or social networking sites at home, particularly 'Facebook'. The schools e-safety steering group provides advice, guidelines and parameters to pupils in an endeavour to keep them safe and on the right side of the law. Pupils and staff are made aware of the risks of radicalisation through social media and skills such as resistance and 'saying no' are taught. Through the PHSEE programme and assemblies, pupils will be given annual guidance on avoiding the dangers involved in social networking. They are also encouraged to peer monitor as well as being advised on how to report issues. The school holds the right to confiscate and observe 'phones and other electronic equipment if they suspect inappropriate use under 2011 DfE guidance 'Screening, Searching and Confiscation'. Parents and pupils are made aware of good resources such as the UK Safer Internet Centre and CEOP.

Plymouth College is in regular contact with parents and carers. Those communications will be used to; reinforce the importance of children being safe online, to help them understand what systems the school uses to filter and monitor online use, to make parents and carers aware of what their children are being asked to do online, including the sites they will be asked to access and to be clear who from the school (if anyone), their child is going to be interacting with online.

## **Visiting speakers**

Plymouth College will ensure that all visiting speakers are suitable by making appropriate background checks and ensuring proper supervision. Particular care will be taken regarding the content of their material in relation to radicalisation and extremist views.

## **SUPPORT NETWORKS**

### **Support for Children**

The school and its staff will offer appropriate support to children who have suffered trauma or abuse or who have abused others through:

- An individual support plan which is reviewed regularly
- Working in partnership with parents, carers and other agencies as appropriate. These may include:
  - Children's Social Care
  - Counselling sessions from professionals
  - GPs
  - Providing initial support through the school's own Counsellor and the School Nurses –

In difficult more complex cases, children will be referred to other external agencies if necessary.

### **Support for Staff involved in a child protection issue**

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved. Plymouth College will support pupils and their families and staff by:

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

If the member of staff is a boarding tutor, alternative accommodation arrangements must be made for this staff member away from the boarding community and other pupils.

If the member of staff is in residential accommodation provided by the school, alternative accommodation arrangements will be made by the Bursar as necessary, for the staff member to be accommodated away from the boarding community and other pupils.

## **DEALING WITH COMPLAINTS**

### **Complaints procedure**

Our complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a pupil, using sarcasm or humiliation as a form of control, bullying or belittling a pupil or discriminating against them in some way. Complaints are managed by the Deputy Head, the Head and Governors. Complaints from staff are dealt with under the school's complaints and disciplinary and grievance procedures.

### **If you have concerns about a colleague / Whistleblowing**

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. Plymouth College has a culture of raising concerns, valuing staff and encouraging reflective practice. It is important to report to the DSL any poor or unsafe practice or potential failings in the Safeguarding regimes within the school. The school's whistleblowing policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place, and mediation or dispute resolution services to be offered. Boarding particularly should promote a culture of whistleblowing. All concerns of alleged child abuse by a member of staff should be reported to the Head. Complaints about the Head should be reported to the Chair of Governors.

## **DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS**

Guidance is followed in accordance with Part Four of the KCSIE (Sept 2023) guidance.

This part of the policy has two sections covering the two levels of allegation/concern:

1. Allegations that may meet the harms threshold.
2. Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as ‘low level concerns’.

### **Allegations that may meet the harms threshold.**

This part of the guidance is about managing cases of allegations that might indicate a person 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.

When an allegation is made against a member of staff (including supply staff, volunteers and contractors), set procedures must be followed. The LADO will be contacted immediately (or within one working day) for advice and guidance if a member of staff has allegedly:

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

This part of the guidance relates to members of staff who are currently working at Plymouth College regardless of whether the school is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

Plymouth College has a duty of care to their employees. We will provide effective support for any member of staff facing an allegation and provide a named contact if they are suspended. It is essential that any allegation of abuse made against a teacher (including supply) or other



member of staff or volunteer in the school is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation. Supply agencies should be kept fully involved when dealing with any allegations against supply teachers from their agencies.

## **Initial considerations**

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services. In these cases, local arrangements should be followed to resolve cases without delay.

Some rare allegations will be so serious they require immediate intervention by children's social care services and/or police. The LADO should be informed of all allegations that come to the school's attention and appear to meet the criteria so they can consult police and children's social care services as appropriate.

The LADO will provide advice and preside over the investigation of any allegation or suspicion of abuse directed against anyone working at the school. No school investigations will take place until the LADO has given permission.

It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can and do happen. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to pupils and we must act on every allegation. The following definitions should be used when determining the outcome of allegation investigations:

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

The Head and or the DSL should be immediately informed of any allegation of abuse by staff or volunteers and contact the LADO immediately. If The Head is the subject of an allegation, the Chair of Governors or a designated governor must be informed and then they must contact the LADO but without informing the Head. If the allegation is regarding the DSL, the Head must be informed.

The purpose of an initial discussion is for the LADO to consider the nature, content and context of the allegation and agree a course of action. The LADO may need to obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and the individual's current contact with children. There may be situations when Head or Chair of Governors will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the Head or Chair of Governors should discuss the allegations with the LADO to determine whether police involvement is necessary.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the Head/Chair of Governors and the LADO and agreement reached on what information should be put in writing to the individual concerned and by whom. The Head/Chair of Governors should then consider with the LADO what action should follow both in respect of the individual and those who made the initial allegation.

The Head/ Chair of Governors should inform the accused person about the allegation as soon as possible after consulting the LADO. It is extremely important that the accused person is provided with as much information as possible at that time. However, where a strategy discussion is needed, or police or children's social care services need to be involved, the Head or Chair of Governors should not do that until those agencies have been consulted, and have agreed what information can be disclosed to the accused.

It is important to consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension should be considered prior to taking that step. If the member of staff is a boarding tutor, alternative accommodation arrangements must be made for this staff member away from the boarding community and other pupils.

If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with the statutory guidance Working Together to Safeguard Children 2015. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take into account that teachers and other staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Where it is clear that an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the LADO should discuss the next steps with the Head or Chair of Governors. In those circumstances, the options open to the school depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension should not be the default position: an individual should be suspended only if there is no reasonable alternative.

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the LADO should discuss with the Head Chair of Governors how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the school's staff. However, in other circumstances, such as lack of appropriate resource within the school, or the nature or complexity of the allegation will require an independent investigator.

## **Supporting those involved**

The school has a duty of care to their employees and will act to manage and minimise the stress inherent in the allegations process. Support for the individual is vital to fulfilling this duty. Individuals should be informed of concerns or allegations as soon as possible and explained the likely course of action, unless there is an objection by the children's social care services or the police. The individual should be advised to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice if at all possible.

The Head/Chair of Governors should appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. Particular care needs will be taken when a member of

staff is suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Parents or carers of a child or children involved should be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the Head/ Chair of Governors should not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers should also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child should be told the outcome in confidence.

Parents and carers should also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing. If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children's social care services, or the police as appropriate, should consider what support the child or children involved may need.

## **Confidentiality**

It is extremely important that when an allegation is made, the school makes every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation undertaken by the TRA.

The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so.

The legislation imposing restrictions makes clear that "publication" of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. "Publication" includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public". This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

In accordance with the Association of Chief Police Officers' (ACPO) guidance the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. (In exceptional cases where the police would like to depart from that rule, for example an appeal to trace a suspect, they must apply to a magistrates' court to request that reporting restrictions be lifted).

The Head/Chair of Governors should take advice from the LADO, police and children's social care services to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if and when it should arise.

## **Resignations and 'settlement agreements'**

If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with the KCSIE (2023) guidance. A referral to the DBS *must* be made, if the criteria are met. This will include anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence; and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

If the accused person resigns or their services cease to be used and the criteria are met it will not be appropriate to reach a settlement/compromise agreement. A settlement/compromise agreement which prevents the school from making a DBS referral when the criteria are met would likely result in a criminal offence being committed as the school or college would not be complying with its legal duty to make the referral.

It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible the accused should be given a full opportunity to answer the allegation and make representations about it. But the process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be substantiated on the basis of all the information available, should continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, should not be used in cases of refusal to cooperate or resignation before the person's notice period expires. Such an agreement will not prevent a thorough police investigation where that is appropriate.

## **Record keeping**

Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where

future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record will be retained indefinitely but at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

## **References**

Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

## **Timescales**

It is in everyone's interest to resolve cases as quickly as possible consistent with a fair and thorough investigation. All allegations should be investigated as a priority to avoid any delay. It is expected that 80 per cent of cases should be resolved within one month, 90 per cent within three months, and all but the most exceptional cases should be completed within 12 months.

For those cases where it is clear immediately that the allegation is unsubstantiated or malicious, they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the employer to deal with it, although if there are concerns about child protection, the employer should discuss them with the LADO. In such cases, if the nature of the allegation does not require formal disciplinary action, the employer should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

## **Oversight and monitoring**

The LADO has overall responsibility for oversight of the procedures for dealing with allegations; for resolving any inter-agency issues; and for liaison with the Plymouth Local Safeguarding Children Board (PLSCB) on the subject. The LADO will provide advice and guidance to the Head/Chair of Governors in addition to liaising with the police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Police forces should also identify officers who will be responsible for:

- liaising with the LADO
- taking part in the strategy discussion or initial evaluation;
- subsequently reviewing the progress of those cases in which there is a police investigation; and
- sharing information on completion of the investigation or any prosecution.

If the strategy discussion or initial assessment decides that a police investigation is required, the police should also set a target date for reviewing the progress of the investigation and consulting the Crown Prosecution Service (CPS) about whether to: charge the individual; continue to investigate; or close the investigation. Wherever possible, that review should take place no later than four weeks after the initial evaluation. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the meeting if the investigation continues.

## Suspension

The possible risk of harm to children posed by an accused person should be evaluated and managed in respect of the child/children involved in the allegations. In some rare cases that will require the Head/Chair of Governors to consider suspending the accused until the case is resolved. Suspension should not be an automatic response when an allegation is reported; all options to avoid suspension should be considered prior to taking that step. If the Head/Chair of Governors is concerned about the welfare of other children in the community or the teacher's family, those concerns should be reported to the LADO or police. But suspension is highly unlikely to be justified on the basis of such concerns alone.

Suspension should be considered only in a case where there is cause to suspect a child or other children at the school is/are at risk of harm or the case is so serious that it might be grounds for dismissal. However, a person should not be suspended automatically: the school must consider carefully whether the circumstances warrant suspension from contact with children at the school or until the allegation is resolved, and may wish to seek advice from their LADO. In cases where the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual at the school or college it will be necessary to immediately suspend that person from teaching pending the findings of the TLR's investigation.

The Head/Chair of Governors should also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. In many cases an investigation can be resolved quickly and without the need for suspension. If the LADO, police and children's social care services have no objections to the member of staff continuing to work during the investigation, the case manager should be as inventive as possible to avoid suspension. Based on assessment of risk, the following alternatives should be considered by the case manager before suspending a member of staff:

- redeployment within the school so that the individual does not have direct contact with the child or children concerned;
- providing a Deputy to be present when the individual has contact with children;
- redeploying to alternative work in the school so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted; or
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or work for the local authority or academy trust.

These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The school should consider the potential permanent professional reputational damage to the member of staff that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended.

If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by both the Head/Chair of Governors and the LADO. This should also include what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable to leave a person who has been suspended without any support. The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

Children's social care services or the police cannot require the school to suspend a member of staff or a volunteer, although they should give appropriate weight to their advice. The power to suspend is vested in the Head or governing bodies of the school who are the employers of staff at the school. However, where a strategy discussion or initial evaluation concludes that there should be enquiries by the children's social care services and/or an investigation by the police, the LADO should canvass police and children's social care services for views about whether the accused member of staff needs to be suspended from contact with children in order to inform the school or college consideration of suspension. Police involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis having undertaken a risk assessment.

### **Information sharing**

In a strategy discussion or the initial evaluation of the case, the agencies involved should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.

Where the police are involved, wherever possible the school should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

Children's social care services should adopt a similar procedure when making enquiries to determine whether the child or children named in the allegation are in need of protection or services, so that any information obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the employer without delay.

## **Specific actions**

### **Following a criminal investigation or a prosecution**

The police should inform the school and LADO immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after person has been charged. In those circumstances the LADO should discuss with the Head/Chair of Governors whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children's social care services should inform that decision. The options will depend on the circumstances of the case and the consideration will need to take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

### **On conclusion of a case**

If the allegation is substantiated and the person is dismissed or the school ceases to use the person's services, or the person resigns, or would have been dismissed had he/she not resigned or otherwise ceases to provide his or her services, the LADO should discuss with the Head/Chair of Governors whether the school will decide to make a referral to the DBS for consideration of inclusion on the barred lists is required; and in the case of a member of teaching staff whether to refer the matter to the Teaching Regulation Authority (TRA) to consider prohibiting the individual from teaching.

If the TRA considers that the teacher:

- may be guilty of unacceptable professional conduct;

- may be guilty of conduct that may bring the profession into disrepute; or
- may have been convicted, at any time, of a relevant offence and that a prohibition order may be appropriate, it will begin an investigation.

**There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.**

Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they **must** consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

### **Returning to work after suspension**

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the Head/Chair of Governors should consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The Head/Chair of Governors should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still a pupil at the school.

### **In respect of malicious or unsubstantiated allegations**

If an allegation is determined to be unsubstantiated or malicious, the LADO should refer the matter to the children's social care services to determine whether the child concerned needs services, or may have been abused by someone else. If an allegation is shown to be deliberately invented or malicious, the Head should consider whether any disciplinary action is appropriate against the pupil who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she was not a pupil.

### **Learning lessons**

At the conclusion of a case in which an allegation *is* substantiated, the LADO should review the circumstances of the case with the school to determine whether there are any improvements to be made to procedures or practice to help prevent similar events in the future. This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and school should consider how future investigations of a similar nature could be carried out without suspending the individual.



## **Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as ‘low-level’ concerns.**

Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

Plymouth College promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

Low-level concern is specifically referred to in the staff code of conduct.

### **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 harms 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.

Examples of such behaviour 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.

### **Key aims:**

- to ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- to empower staff to share any low-level safeguarding concerns
- to address any unprofessional behaviour and supporting the individual to correct it at an early stage
- to provide a responsive, sensitive and proportionate handling of such concerns when they are raised
- to help identify any weakness in the school or colleges safeguarding system

### **Sharing low-level concerns**

Staff must share **low-level concerns** responsibly and with the DSL (or the Chair of Governors if the concern is about the Head). The DSL should inform the Head of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern. The Head should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in some schools/colleges, the Head may wish to consult with the DSL and take a more collaborative decision-making approach. They will then be recorded in writing and dealt with appropriately. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

If the DSL / Head are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with their LADO

Plymouth College aims to create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

### **Recording low-level concerns**

All low-level concerns will be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

These records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

Plymouth College will retain this information at least until the individual leaves our employment.

### **References**

Plymouth College only provides substantiated safeguarding allegations in references. 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. It follows that a low-level

concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. 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 should be referred to in a reference.

### **Responding to low-level concerns**

If the concern has been raised via a third party, the Head / Chair of Governors will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The information collected will help the Head to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken.

Plymouth College will use the low-level concern form to record all incidents or concerns. This can be found at the last page of the Low Level Concern Policy

### **Staff training**

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern.

All staff, including voluntary and support staff as well as the Head and the designated governor will receive training which will include the Prevent Duty and Female Genital Mutilation and this will be updated formally from an external provider at least every three years. This training will include online safety training and informal online safety updates.

The DSL and the Deputy DSL will receive formal training updated at least every two years, including training in inter-agency procedures, Prevent Duty, Radicalisation awareness and Female Genital Mutilation awareness, serious case reviews and updates on good practice.

The DfE has produced a one-stop page for teachers on GOV.UK, which can be accessed here: Staff will be regularly referred to the <https://www.gov.uk/guidance/teaching-about-relationships-sex-and-health>

New staff and governors will receive training quickly on arrival using Part 1 of the revised KCSIE 2023.

Supply staff and other visiting staff will be given the school's Visiting Staff Leaflet (see: Appendix 2).

In addition, all staff will sign a document (Appendix 8) to confirm that they received, read and understood a copy of the

- o Part 1 and Part 5 (if a teacher) of the revised KCSIE 2023 document.
- o Safeguarding/child protection policy
- o Behaviour Policy
- o Staff ICT Acceptable Use Policy
- o Staff Code of Conduct

Medical staff will have extended training in mental health issues.

In addition, senior pupils such as senior prefects or boarding prefects, with positions of responsibility for younger pupils, will be given training on appropriate actions to take should they receive or witness any disclosures or allegations or direct evidence of abuse.

## **Safeguarding Induction Process for New Starters**

1. 20-minute meeting required with DSL before start of unsupervised work.
  - a. Meeting to cover basic knowledge of safeguarding, reporting concern structure, who's who in DSL team, safeguarding yourself etc
  - b. Paperwork, policies and signing sheets to be given out to all candidates.
  - c. Safeguarding card for name badge to be given out.
2. Safeguarding training to be attended in the term you start in - given by a member of the DSL team 45-60 minutes.
3. Complete the online Channel safety awareness training for Prevent.
4. Join in with the Annual training cycle

## **SAFER RECRUITMENT**

Plymouth College endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in the Keeping Children Safe in Education (2023) together with the local authority and the school's individual procedures. At least two members of staff will have received training in safer recruitment.

Full detail of recruitment and selection is found in the separate policy named 'Recruitment Policy'

Safer recruitment means that all staff will:

- complete an application form
- provide two referees, including at least one who can comment on the applicant's suitability to work with children
- provide evidence of identity and qualifications
- be checked and registered through the DBS to the enhanced level irrespective of their role
- Checks will be made with the appropriate authority for any new member of staff arriving from overseas, or who has lived overseas.
- be interviewed (by someone that is safer recruitment trained)

As part of the shortlisting process, we will carry out an online search as part of due diligence on shortlisting candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school might want to explore further at interview.

All staff in regulated activity will have the correct DBS and Barred List checks as well as checks on 'Right to Work' in the UK, Prohibition from teaching, Prohibition from Management and medical fitness for the role.

Appropriate DBS checks (free for volunteers) will be made by the School and correct procedures applied if a pupil from the school is under the supervision of a person employed by a different organisation. The School office will hold and keep updated the Single Central Record of DBS checks.

All new members of staff will undergo an induction that includes familiarisation with the school's safeguarding/child protection policy and identification of their child protection training needs. During this induction, new staff will be made aware of the whistleblowing policy for the school. All staff sign to confirm they have received, read and understood a copy of the

- Part 1 (and Part 5 if a teacher) of the revised KCSIE 2023 document.
- Safeguarding/child protection policy
- Behaviour Policy
- Staff ICT Acceptable Use Policy
- Staff code of Conduct

The school will report to the DBS and Teaching Regulation Authority (TRA) within one month any person (whether fully employed, contracted, a volunteer or a GAP student) whose services are no longer used because he or she is considered unsuitable to work with children. No compromise agreements will be entered in these circumstances.

Advice will be gained from the TRA publication: Teaching Regulation Agencies' 'Teacher misconduct – the prohibition of teachers' (April 2018). If the TRA considers that the teacher:

- may be guilty of unacceptable professional conduct;
- may be guilty of conduct that may bring the profession into disrepute; or
- may have been convicted, at any time, of a relevant offence and that a prohibition order may be appropriate, it will begin an investigation.

## **Opportunities to teach safeguarding**

Governing bodies and proprietors should ensure that children are taught about safeguarding. Schools should consider this as part of providing a broad and balanced curriculum. This may include covering relevant issues for schools through Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools) which will be compulsory from September 2020. Schools have flexibility to decide how they discharge their duties effectively within the first year of compulsory teaching and are encouraged to take a phased approach (if needed) when introducing these subjects. The statutory guidance can be found here: [Statutory guidance: relationships education relationships and sex education \(RSE\) and health education](#). Colleges may cover relevant issues through tutorials. The following resources may help schools and colleges:

Online safety, resistance to radicalisation and avoiding/coping with mental health issues and bullying are all covered in the PHSEE programme, assemblies and aspects of the curriculum.

## **Online safety**

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate. This includes appropriate filtering and monitoring on school devices and school networks.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

**content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group

Staff must note the need to be vigilant for safeguarding issues when home learning online is taking place instead of face to face learning.

The college uses the online safety self-review tool called 360 safe.

Resources that could support the school to teach online safety are listed in Annex B of KCSIE 2023, including new material e.g. that includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support. <https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes/harmful-online-challenges-and-online-hoaxes>

## **ISSUES BEYOND THE SCHOOL BOUNDARIES**

### **Enrichment activity and off-site arrangements**

Where school enrichment activities are provided by and managed by the school, our own child protection policy and procedures apply. If other organisations provide services or activities on or off our site we will check that they have appropriate procedures in place, including safer recruitment procedures and will ensure that they are supervised at all times.

When our pupils attend off-site activities, we will check that effective child protection arrangements are in place by gaining the necessary risk assessments, DBS checks and qualifications.

### **Photography and images**

The school will regularly use images of our pupils for newspaper articles, newsletters, promotional material and the Yearbook. To protect pupils, we ask parents to opt in to consent to photographic or video images being taken and used by the school.

### **Electronic communication**

The school holds the right to intervene and become involved in dealing with any incident that happens out of school hours and /or offsite if it is deemed appropriate to be causing harm or can be potentially harmful to a pupil.

Children will be given guidance on the dangers and consequences of the illegal act of passing on inappropriate images of themselves or each other.

# **MOBILE PHONE USE**

Please refer to the Mobile Phone Policy for guidance on use.

[Mobile Phone Policy.docx](#)

## **Appendix 1A**

### **The seven golden rules to sharing information**

1. Remember that the Data Protection Act (2108) and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. Consent is not required for a referral to statutory agencies where there are concerns about a child's safety. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

## Appendix 1B

### **Plymouth Safeguarding Children Board** **Safeguarding Children Good Practice Checklist**

- Have you been able to speak to the child alone?
- Can you still speak to the child alone?
- Where will the child be, for the next 24 hours?
- Is there an immediate risk of harm to the child?
- Do you have the information about the child and family?
- Have you completed the Common Assessment Framework, or equivalent?
- Are other children at risk of harm?
- Is the mother at risk of harm?
- Do you consider it safe to discuss the concerns with the parents?
- Will the child/young person resist efforts to safeguard them (drugs/coercion)?
- Have you recorded, clearly and promptly everything said by:
  - The child
  - Parents
  - Family



- o Professional / outside agents
- Have you recorded, in writing, clearly and promptly everything you have said to:
  - o The child
  - o Parents
  - o Family
  - o Professional / outside agents
- Have you complied with the current Child Protection Procedures?
- Is there a need to inform Police, because a crime has been committed?

## Appendix 1C

### **KCSIE Guidance on Making a safeguarding report**

Local policies (and training) will dictate exactly how reports should be managed. However, effective safeguarding practice includes:

- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognising a child is likely to disclose to someone they trust: this could be **anyone** on the school or college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- listening carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc;
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;
- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation;
- where the report includes an online element, being aware of [searching screening and confiscation](#) advice (for schools) and [UKCCIS sexting](#) advice (for schools and colleges). The key consideration is for staff not to view or forward illegal images of a

child. The highlighted advice provides more details on what to do when viewing an image is unavoidable.

- if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible; and
- informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

## **Appendix 2**

### **Visiting staff child protection information leaflet**

#### **School statement**

*We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. While working in our school we expect you to take care of our pupils and follow our procedures.*

#### **Key facts about child abuse**

Abuse and neglect can happen to any child, boy or girl, of any race, culture, ethnicity or sexuality. Disabled children and children with SEN are particularly vulnerable. Many children are unable to disclose what is happening to them and rely on us to interpret their behaviour and spot signs of abuse.

A pupil may:

- have a bruise, burn or injury that seems suspicious
- show signs of pain or discomfort
- be unnaturally passive or withdrawn
- be unpredictable and challenging
- seem anxious, fearful or distressed
- provide an unlikely explanation for their injury or their behaviour.

If you are concerned for a child's health, welfare or safety in any way you must speak to the DSL (DSL) or a senior member of staff before you leave the school site.

Do not question the pupil or try to secure evidence. Your responsibility is to report your concern, not to investigate.

If a pupil tells you something that suggests they are at risk of harm, allow them to tell you as much as they wish and let them know that you must pass the information on to the DSL or Deputy DSL.

If you become concerned about a pupil's immediate safety, notify the nearest member of staff and tell them why you are concerned.

You should complete a welfare concern form (attached) and hand it to the DSL or a senior member of staff before you leave the school site. Ask a senior member of staff if you would like help to complete the form.

If you have any questions or wish to see our safeguarding and child protection policy, please contact the DSL.

### **Appendix 3**

#### **Procedures for a child missing from education - Senior School**

Plymouth College will follow the Plymouth local authority safeguarding procedures and those laid out by the KCSIE (2023) guidance when dealing with children who go missing to help prevent risks of abuse, neglect and sexual exploitation.

All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

A child going missing from education is a potential indicator of abuse or neglect. School staff should follow the school's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

Plymouth College will put in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

The law requires all schools to have an admission register and, with the exception of schools where all pupils are boarders, an attendance register. All pupils must be placed on both registers

Plymouth College will inform the local authority of any pupil who is going to be deleted from the admission register where they:

- have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,

- have been permanently excluded.

The school will notify the local authority if we delete a pupil from our register under the above circumstances. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

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

### **Boarders:**

If at any stage a boarder is found to be unexpectedly missing from their Boarding House, the member of staff on duty will apply the following procedures:

1. The Daily or Weekend Whereabouts Sheet will be checked.
2. The House Signing In/Out Book will be checked.
3. The boarder's friends will be consulted without causing alarm.
4. The Housemaster/Housemistress will be alerted.
5. The Housemaster/Housemistress will attempt to contact the boarder on their mobile phone.
6. The boarding houses will be searched.
7. The school site will be searched.
8. If the boarder remains unaccounted for, the Head of Boarding must be alerted.
9. The Head of Boarding will contact the boarder's parents/guardian to inform them and consult them for possible destinations.
10. The Head of Boarding will inform the Head.
11. If no clues are gathered, or there is concern for the welfare of the boarder, the Police and Parents will be alerted immediately by the Head of Boarding.
12. The incident must be logged in the Staff Handover Books and in the Individual Boarder's Welfare Record.

### **Day Pupils:**

If a day pupil goes missing:

1. Contact the school office immediately.
2. The HOY and the SLT will start to search the premises with help from other staff if possible.
3. Attempt to make contact by mobile phone if a number can be accessed through friends.
4. If the child is not found within 15 minutes, parents must be notified.
5. Continue searching and keeping contact with parents.
6. Consider involving the police if the timescale of absence is long and parents are in agreement.
7. Record the incident on SIMS Behaviour Management.

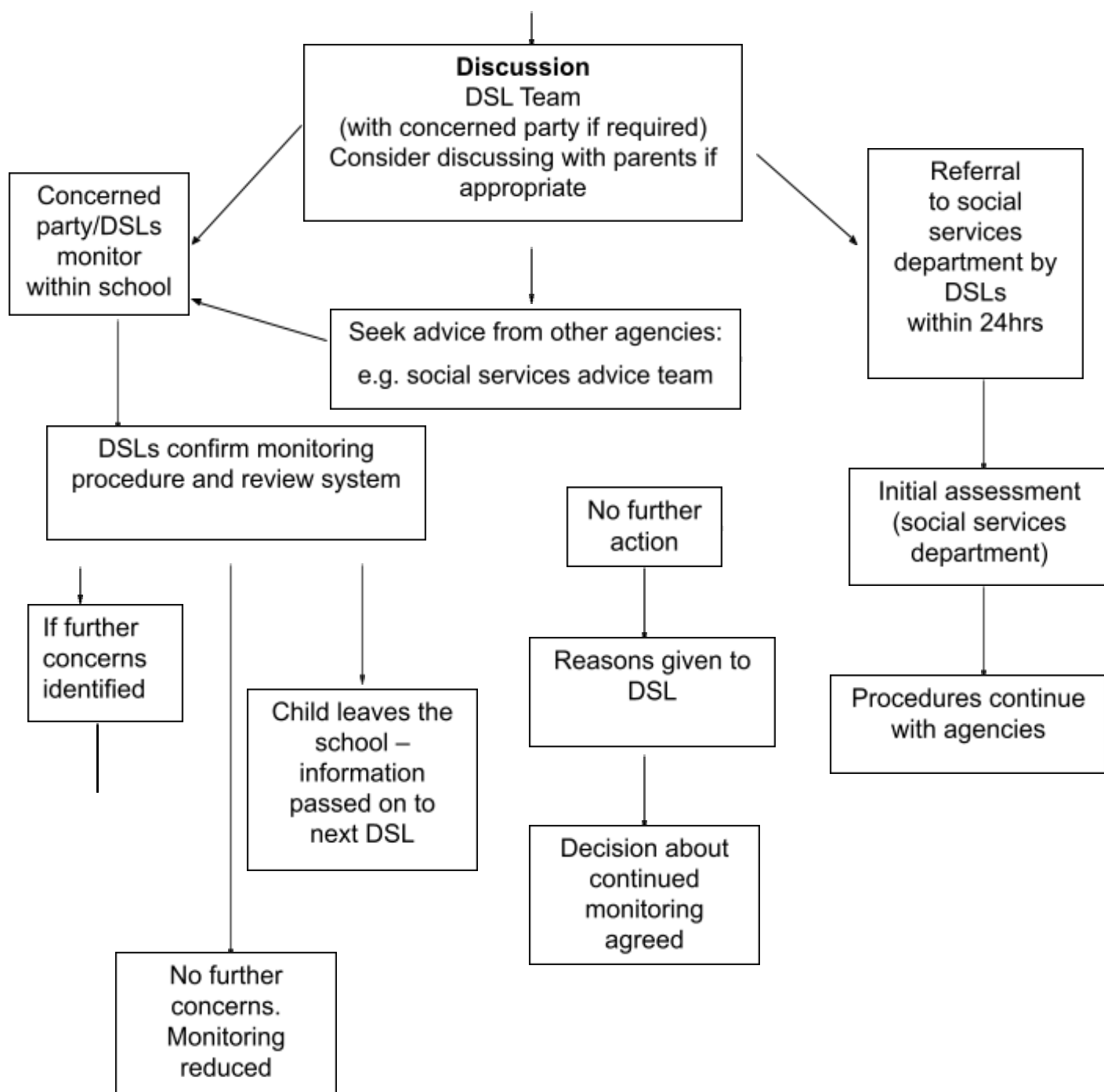


## Appendix 4

### Action flowchart:

Please note that **Anyone** can raise a Cause for Concern. The Cause for Concern must be made in writing within 24 hrs of finding out about the concern. This would usually be made via an email to [safeguarding@plymouthcollege.com](mailto:safeguarding@plymouthcollege.com) or [prepsafeguarding@plymouthcollege.com](mailto:prepsafeguarding@plymouthcollege.com) unless the Cause for Concern was about a member of the Safeguarding Team. In this case email directly to a member of the safeguarding team that it does NOT concern.

**Report a Cause for concern**  
 Email the relevant DSL Team / Individual  
 within 24 hours  
[safeguarding@plymouthcollege.com](mailto:safeguarding@plymouthcollege.com) or [prepsafeguarding@plymouthcollege.com](mailto:prepsafeguarding@plymouthcollege.com)



## Appendix 5

### Form for recording Safeguarding & Child Protection concerns



**After completing the form, email it to [safeguarding@plymouthcollege.com](mailto:safeguarding@plymouthcollege.com) or [prepsafeguarding@plymouthcollege.com](mailto:prepsafeguarding@plymouthcollege.com) or pass it immediately to the Designated Safeguarding Lead (Charlie Irish) or a Deputy DSL in his absence.**

Name of Child:	
Tutor Group of Child:	
Date & Time of incident / disclosure.	
Staff Member completing this form:	
Date and time this form was completed.	
Factual account of the incident or concern: Who? What? Where? When?  If a disclosure from a child, then you must record exactly what the child said.	
Additional information / opinion from staff member, if appropriate.	
Who else received this information? (Parent, HoY, Tutor, SENCO, Nurse)	
What action has been taken and by whom?	

## Appendix 6 - Essential contacts

Name and role:	Address, telephone and email address
School Designated Safeguarding Lead	Mr Charles Irish Deputy Head Plymouth College Ford Park Plymouth PL4 6RN Tel: 01752 505110 Email: <a href="mailto:cirish@plymouthcollege.com">cirish@plymouthcollege.com</a>
Head (interim)	Mr Adam Carr Plymouth College Ford Park Plymouth PL4 6RN Tel: 01752 505103 Email: <a href="mailto:acarr@plymouthcollege.com">acarr@plymouthcollege.com</a>
i/c Prep School - Deputy Designated Safeguarding Lead	Mrs Jo Newnham Deputy Head of Prep Plymouth College Ford Park Plymouth PL4 6RN Tel: 01752 505101 Email: <a href="mailto:jnewnham@plymouthcollege.com">jnewnham@plymouthcollege.com</a>
Nominated governor	Mrs Alison Morton Email: <a href="mailto:alison.morton@plymouthcollege.com">alison.morton@plymouthcollege.com</a>
Ofsted	Royal Exchange Buildings St Ann's Square Manchester M2 7LA  Tel: 08456 014772 / 08456 404045 Email: <a href="mailto:enquiries@ofsted.gov.uk">enquiries@ofsted.gov.uk</a>
Plymouth Safeguarding Children Partnership (PSCP).	Plymouth Safeguarding Children Partnership (PSCP). Windsor House Tavistock Road Plymouth PL6 5UF Tel: 01752 307535 Email: <a href="mailto:pscb@plymouth.gov.uk">pscb@plymouth.gov.uk</a>
Plymouth Local Authority Designated Officer (LADO)	Plymouth Safeguarding Children Partnership (PSCP). Plymouth City Council, Midland House, Notte Street, Plymouth PL1 2EJ Tel: 01752 304769 <a href="mailto:LADO@plymouth.gov.uk">LADO@plymouth.gov.uk</a>
NSPCC helpline	NSPCC Helpline 42 Curtain Road London EC2A 3NH  Tel: 0808 800 5000 Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>



<p>Children's Social Care</p>	<p>Advice and Assessment Service  Children's Services  Plymouth City Council  Plymouth PL1 2AA</p> <p>Tel: 01752 308600  Email: <a href="mailto:adviceandassessment@plymouth.gov.uk">adviceandassessment@plymouth.gov.uk</a></p>
<p>Local Police</p>	<p>Plymouth BCU Commander  Plymouth BCU Headquarters  Crownhill Police Station  Budshead Way  Plymouth  PL6 5HT</p> <p>Tel: 08452 777444</p>
<p>CAMHS</p>	<p>Child and Adolescent Mental Health Service (CAMHS)  Advice and Assessment Service  Children's Services  Plymouth City Council  Plymouth PL1 2AA</p> <p>Tel: 01752 308600  Email: <a href="mailto:adviceandassessment@plymouth.gov.uk">adviceandassessment@plymouth.gov.uk</a></p>
<p>Health Authority</p>	<p>NHS Plymouth  Plymouth Primary Care Trust  Building One  Brest Road  Plymouth  PL6 5QZ</p> <p>Tel: 01752 315315  Email: <a href="mailto:ask@plymouth.nhs.uk">ask@plymouth.nhs.uk</a></p>

# **Plymouth College Annual Staff Declaration Form 2023-2024.**

[Annual Staff Signing Sheet 2023-2024.docx](#)