

EDGBASTON COLLEGE

Child Protection and Safeguarding Policy

This policy applies to all students, staff and volunteers in the college

This policy also includes the following policies:

Online Safety Policy
Policy on the use of cameras and mobile phones
Policy on the use of reasonable force, physical restraint and physical contact
Students missing education policy

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EDGBASTON COLLEGE

Child Protection and Safeguarding Policy

1. INTRODUCTION

EDGBASTON COLLEGE fully recognises its responsibilities for Child Protection. Every student should feel safe and protected from any form of abuse. This is defined in this policy as any kind of neglect, non-accidental physical injury, sexual abuse and sexual exploitation or emotional ill treatment.

This policy applies to all teaching and non-teaching staff and volunteers, is available on the college's website and is available to parents on request. It applies to all areas of the college.

This policy has been written in accordance with:

- i. the DfE guidance document 'Keeping Children Safe in Education' (KCSIE September 2020), the updated guidance provided in the document 'Working Together to Safeguard Children' (July 2018) (WTSC).
- ii. Locally agreed inter-agency procedures; the college will participate as appropriate in 'common assessment framework' (CAF) or the 'team around the child' (TAC) approaches, or a 'co-ordinated offer of early help', in accordance with WTSC.
- iii. The college recognises the importance of early help in college (see section 4, Procedures) and the difference between a concern and a student in immediate danger; in each case the DSL will work in accordance with WTSC 2108 and the Birmingham Safeguarding Children Partnership (BSCP) referral thresholds.

Safeguarding is everyone's responsibility and anyone can make a referral, which will usually be to the college's DSL, but can be directly to Children's Social Care, if necessary.

KCSIE 2020 defines safeguarding and promoting the welfare of children as:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

In relation to safeguarding, 'children' includes everyone under the age of 18.

The college aims to:

- Ensure safe recruitment practices in checking the suitability of staff and volunteers to work with students.
- Raise awareness of child protection issues and equip students with the skills needed to keep themselves safe.
- Develop and implement procedures for identifying and reporting cases or suspected cases of abuse.
- Support a student who has been abused in accordance with his or her agreed child protection plan.
- Maintain a safe environment in which students can learn and develop.
- Communicate readily with the BSCP/LADO whenever an allegation or disclosure of abuse has been made.

The college endeavours to provide a strongly supportive pastoral environment, in which students have a range of adults to whom they can turn, should they have a concern. These include the teachers, principal, college counsellor/listener and college nurse. Details of helplines are also available.

Learning about safeguarding

KCSIE and DfE guidance make it clear that students should learn to recognise when they are at risk and how to get help when they need it. At Edgbaston College, students learn about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum, including assemblies, focused events and visiting speakers. This enables them to learn to recognise when they are at risk, including in matters of online safety and mental health, and how to get help when they need it.

2. SAFE RECRUITMENT

Edgbaston College recognises the importance of following recruitment and selection procedures on the appointment of employees and volunteers which help to deter, reject or identify people who might abuse students, or are otherwise unsuited to work with them. Recruitment procedures are carried out in accordance with guidance given in 'KCSIE (September 2020)'.

To ensure safer recruitment, the procedures are designed to:

- Scrutinise applicants
- Verify identity
- Verify academic or vocational qualifications
- Obtain professional and character references
- Check previous employment history
- Ensure that a candidate has the health and physical capacity for the job
- Incorporate a face to face interview
- Include a barred list and Disclosure and Barring Services (DBS) check
- Include an overseas check equivalent to the DBS check for staff appointed directly from overseas
- Verify the applicant's right to work in the UK
- Include a prohibition order check (for those who undertake 'teaching work'*) and also an EEA prohibition check or letter of professional standing for staff appointed to do teaching work from the EEA other than England
- Include a prohibition from management check (for the principal, those who are on the college's leadership and governance teams and for teaching heads of department)

* 'Teaching work': a definition is provided in The Teachers' Disciplinary (England) Regulations 2012 and cited in the ISI Regulatory Handbook. The college will judge each appointment on a case-by-case basis to determine whether the role includes 'teaching work'.

These procedures apply to all adults who may undertake a regulated activity (unsupervised) with the students in either a paid or voluntary capacity and any other staff where KCSIE requires checks to be undertaken. The college will verify that child protection checks and procedures listed above have been successfully undertaken for all staff employed by another organisation and who work with the college's students either at the college or on another site. This applies, for example, to staff at an outward bound activity centre and to visiting staff running activities or undertaking sports coaching, even where such staff are paid directly by the parents.

It is the responsibility of those who work or volunteer at the college, or with the college's students at a different venue, to inform the principal immediately if, during the time of their engagement with the college, their circumstances change in such a way that they become disqualified or prohibited from teaching or in any other way barred from working with children.

Full details of the college's recruitment procedures can be found in the 'safer recruitment policy and checklist'.

3. AWARENESS OF CHILD PROTECTION ISSUES

We recognise that, because of their day-to-day contact with students, staff at the college are well placed to observe the outward signs of abuse. Edgbaston College will therefore

- Establish and maintain an environment where students feel secure, are encouraged to talk, and are listened to
- Ensure that students know that there are adults in the college whom they can approach if they are worried or in difficulty
- Ensure that staff recognise the college's duties both to students in need and to students at risk of harm
- Include in the curriculum activities and opportunities for PSHE which equip students with the skills they need to stay safe from abuse, including keeping safe online, and to know whom to turn to for help
- Include in the curriculum material that will help students develop realistic attitudes to the responsibilities of adult life, particularly with regard to childcare and parenting skills
- Ensure all staff, including ancillary staff and representatives of the proprietors, receive comprehensive training on child protection issues, as specified by the Birmingham Safeguarding Children Partnership (BSCP) in frequency and content, not less than every three years supplemented by informal updates as required, but at least annually.
- Ensure that all staff have read and understand at least part 1 of KCSIE (September 2020); the understanding of staff will be secured and verified by the following measures undertaken by the college
 - Safeguarding Induction Training which talks new staff through the content in a level of depth appropriate and proportionate to the person and their role
 - INSET Training
 - Reminders in Staff Meetings
 - Other means of probing understanding, such as governors' interviews with random staff and the annual Safeguarding Review
- Ensure that all college leaders and staff that work directly with students read Annex A of KSCIE 2020 which deal with types of abuse and matters such as children missing education, child exploitation, FGM, radicalisation, forced marriage and honour-based abuse
- Ensure that temporary and voluntary staff who work with students are made aware of the arrangements, based on a risk-based approach – whereby the college assesses the level of detail with which such staff should be provided. In addition, all new staff and volunteers will receive training as part of their induction process, which will include an explanation of the systems to support Safeguarding. To ensure best practice, the DSLs will receive appropriate training, including in inter-agency working, every two years, supplemented by informal updates as required, but at least annually in accordance with locally agreed procedures and the requirements of KCSIE.

In order to ensure that new staff are fully aware of their duties regarding safeguarding, as part of the induction training for all staff, they will receive an explanation of:

- This safeguarding policy
- The staff code of conduct/behaviour policy
- The behaviour policy for students
- The college's safeguarding response to children missing education
- The role and identity of the DSL, and Deputy
- The college's approach to online safety

Additionally, at induction, staff are provided with a copy of

- This safeguarding policy
- The staff code of conduct/behaviour policy (see 10, below in this policy)
- The Children Missing Education policy (contained within Appendix 1 of this policy)

- The role of the DSL and DDSL(s) (contained within this policy)
- Part 1 and Annex A of KCSIE (September 2020)
- The whistle-blowing policy

Awareness of Mental Health issues

Linking with the new statutory elements of the PSHE curriculum, Mental Health has a raised prominence KCSIE. The college ensures that staff, and the DSL in particular, have a deeper understanding of its relationship to safeguarding. This includes not simply recognising signs of abuse and neglect but also

- anticipating the potential for abuse and responding effectively
- ensuring remedial interventions
- recognising the longer-term safety and well-being implications of abuse and neglect

This expectation can be seen in the following statements in KCSIE

- Staff are “well placed” to identify behaviour suggestive of a mental health problem or being at risk of developing one
- All staff to have an awareness of mental health problems as an indicator of abuse, neglect or exploitation
- They should understand the lasting impact of abuse, neglect and Adverse Childhood Experiences and the impact on mental health, behaviour & education.

All staff are 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. College staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated safeguarding lead or a deputy.

Links to further sources of information and advice can be found in Appendix 2

New requirements in relation to mental health in KCSIE 2020 include giving the DSL a duty to work with senior mental health leads (Annex B - see p98). It may also be necessary for the DSL to be working more closely with children’s social workers.

Links between Safeguarding and Relationships and Sex Education (RSE)

In 2020 new statutory guidance was introduced covering the teaching of RSE within the PSHE curriculum. The guidance on the new RSE requirements makes it clear that there are strong links between safeguarding and RSE, in particular, the part schools can play in keeping children safe and preventative education. Understanding the links is particularly important in areas such as sexual violence, preventing and tackling bullying, behaviour, discrimination and mental health. The DSL has a particular awareness and oversight of these cross-referenced areas and keeps staff informed accordingly.

Issues within the RSE curriculum which could overlap with the safeguarding include

- Consent
- Choices
- Child Sexual Exploitation and Child Criminal Exploitation
- Unhealthy/abusive family relationships
- Internet/online safety
- Abusive intimate relationships

Private Fostering

KCSIE notes that there is a mandatory duty to report to the local authority where a private fostering arrangement is known or suspected. A private fostering arrangement is one that is

made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins. If staff become aware of a private fostering arrangement, it should be reported to the DSL for onward reporting.

4. PROCEDURES

The college will follow the procedures set out by Birmingham Safeguarding Children Partnership and take account of guidance issued by the Department for Education (DfE), as noted above. Links to these documents can be found in Appendix 2.

In order to meet the aims of this policy, the college has the following measures in place:

Edgbaston College ensures that the college has a DSL who has received appropriate training and support for such a role and a DDSL with a similar level of training to cover in the event of absence. In the event of the DSL being the subject of an allegation, the college's response will be co-ordinated by the DDSL, who will liaise with Safeguarding Governor or proprietor.

The college ensures that every member of staff (including temporary and supply staff and volunteers) know and understand:

- The name of the DSL and DDSLs and their roles
- The responsibility of all staff to be alert to the signs of abuse and their responsibility for referring any concerns to the DSL.
- The procedures identified within the college policy.

The college ensures that parents have an understanding of the responsibility placed on the college and staff in relation to safeguarding and child protection, by publishing appropriate policies on the college's website.

The college ensures that members of staff are aware of the need to act on concerns about the welfare of a student immediately and to speak with the DSL or DDSL in accordance with this policy. Staff need to be alert to signs of abuse and know how to respond to a student who may tell of abuse. The college provides child protection training within the induction programme for all new staff and volunteers. The three-yearly training for staff is provided either by the LSP, an external welfare agency acceptable to the LSP, or those who are DSLs within the college and have up-to-date inter-agency training.

The college is committed to developing effective links with relevant agencies and co-operating as required with their enquiries regarding child protection matters. The college will deal appropriately and immediately with every suggestion or complaint of abuse. Any allegation or suspicion of abuse, from within or outside the college, will be managed in accordance with this policy and, in all proper circumstances, will be referred to an external agency for investigation. The college will not undertake its own investigations of allegations without prior consultation with the LADO(s), or in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, discussions with the LADO(s) can be held informally and without naming the college or individual, to determine whether a formal referral is required.

For students in need, a referral will be made to Children's Social Care and for students at risk, a referral will be made to Children's Social Care immediately. They have a duty to respond. Staff should also be alert to any student who may benefit from early help. The DSL has responsibility to take the lead in matters of early help. In particular, staff should be alert to the potential need for early help for a student 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
- is at risk of modern slavery, trafficking or exploitation
- is in a family circumstance presenting challenges for the student, such as substance abuse, adult mental health problems or domestic abuse
- has returned home to his or her 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.

Detailed information on early help can be found in Chapter 1 of WTSC 2018.

The DSLs and staff must be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping students safe. The DfE guidance 'information sharing advice for safeguarding practitioners (see link in Appendix 2) supports staff who have to make decisions about sharing information.

Where there is a concern about a member of staff, the referral will be made to the local authority designated officer, or team of officers (LADO) within one working day. Other agencies may be contacted, such as the child protection unit of the police (CPU) or the NSPCC, in accordance with the procedures published by the BSCP. If a crime has been committed, the matter will be reported to the police and, in cases of serious harm, the police will be informed from the outset.

When following up incidents, disclosures or allegations, staff will consider the welfare of all students. Where it is deemed necessary to speak with students, those involved will be offered the option of having another adult present. Where allegations are of a serious nature, parents or guardians will routinely be invited to attend, unless the allegation is of a nature where their presence may cause greater upset or jeopardise any possible police action.

The college will maintain written records of concerns, discussions and decisions made, and the reasons for those decisions, about students (noting the date, event and action taken), even when there is no need to refer the matter immediately. If the latter is the case, the college's record-keeping will include an explanation of why it was considered that the threshold for referral was not met.

The college ensures that all records are kept securely, separate from the main student file, and in locked locations.

On making a referral, the college can expect the local authority to make a decision within one working day about the type of response that is required, letting the referrer know the outcome. This will include determining whether:

- the student requires immediate protection and urgent action is required
- the student is in need, and should be assessed under section 17
- there is reasonable cause to suspect the student is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the student assessed under section 47
- any services are required by the child and family and what type of services;

- further specialist assessments are required in order to help the local authority to decide what further action to take.

The college should follow the matter up with the local authority if information is not forthcoming. For further information on action to be taken in relation to safeguarding concerns staff can refer to the flowchart in KCSIE 2020.

The college maintains and operates practices which promote this policy and which, so far as possible, ensure that teachers, and others who are innocent, are not prejudiced by false allegations. In this respect, the college acknowledges the updated guidance provided in Part 4 of KCSIE (September 2020).

The college ensures that safe recruitment practices are carried out and that key staff have undertaken safer recruitment training, which needs to be renewed every five years. All interview panels will include at least one person who has undertaken such training. The college takes all practicable steps to ensure that college premises are as secure as circumstances permit. The college ensures that the duty of care towards students and staff is promoted, by raising awareness of illegal, unsafe and unwise behaviour and assists staff to monitor their own standards and practice.

The college has a culture of safety and reflective practice, where staff are valued and concerns can be raised, including about poor or unsafe practice and potential failures in the college's safeguarding regime. Its whistleblowing policy is available as a separate document. Staff are made familiar with the policy through staff training. Whistleblowing is covered in the college's staff code of conduct and its programme of induction for new staff. The college operates robust and sensible health and safety and fire protection procedures. The college is alert to the medical needs of all students (particularly those with specific requirements).

IN THE EVENT OF AN ALLEGATION OR A DISCLOSURE BY A STUDENT, THE FOLLOWING WILL BE CONSIDERED:

a) INITIAL COMPLAINT

A member of staff suspecting, or hearing a complaint of, abuse:

- Must listen carefully to the student and keep an open mind.
- Must not take a decision as to whether or not abuse has taken place.
- Must not ask leading questions, that is, a question which suggests its own answer. "Use the TED Questions" formula below.
- Must reassure the student but not give a guarantee of absolute confidentiality.
- Must explain the need to pass the information to a DSL, who will ensure that the correct action is taken.
- Must keep a sufficient written record of the conversation. The record must include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials.
- Must keep the record secure and hand it to the DSL.

TED Questions:

Tell me about this

Explain what happened

Describe this to me

b) PRESERVING EVIDENCE

All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be safeguarded and preserved.

c) REPORTING

A member of staff needs only reasonable cause for concern in order to act. One sentence from the student, indicating abuse or non-accidental injury, provides staff with reasonable grounds and is sufficient for them to act. This may also apply if clear information comes from a sibling or another adult. However, as many of the signs of child abuse are also commonly associated with other medical, social or psychological problems, a member of staff may naturally wish to discuss some initial concerns with the DSL. All suspicion or complaints of abuse must be reported only to the DSL, or if it involves the DSL, to the DDSL, who will liaise with the Principal, (unless the Principal is the subject of the suspicion or complaint).

d) ACTION BY THE DSL:

The DSL will contact the Birmingham City Council Children's Advice and Support Service(CSS) if he or she believes a student may be in need or at risk of significant harm and may follow this up with a written referral to Social Care. If appropriate, the student may well be told what action is being taken and what will happen next. Allegations against someone in a position of trust are the only cases that must all be reported to the LADO. If there is room for doubt as to whether a referral should be made, the DSL may consult with appropriate professionals on an informal basis.

The DSL's options for action include:

- managing any support for the student internally via the college's own pastoral support processes
- an early help assessment
- a referral for statutory services, for example, as the student might be in need, is in need, or suffering or likely to suffer harm

Action taken may also include:

- Sharing information with the Principal, safeguarding governor, or DDSL
- Contacting the parents or carers
- Calling an internal pastoral meeting to discuss the situation – all appropriate persons would be invited (*e.g. tutor, head of pastoral care, college nurse*). At this point a pastoral care plan may be instigated.

The action to be taken will take into account:

- This Child Protection and Safeguarding Policy.
- The procedures published by the LSP
- The nature and seriousness of the suspicion or complaint. Any complaint involving serious harm or a serious criminal offence will always be referred to the Safeguarding in Education Team (or equivalent body within your LA), the LADO (if the person under suspicion is in a position of trust) and the police without further investigation within the college.
- The wishes of the student who has complained, provided that the student is of sufficient understanding and maturity and properly informed. However, there may be times, if the student is suffering or is a risk of suffering significant harm, when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a student's wishes. The welfare of the student is paramount.
- The wishes of parents, provided they have no interest which is in conflict with the student's best interests and that they are properly informed. However, parental consent is not required for referrals to statutory agencies. This may be the necessary course of action after all appropriate consultation.
- Any concern from the DSL that disclosing information to parents would put a child at risk. In this case, he or she will take further advice from the relevant professionals before making a decision to disclose.
- Duties of confidentiality, so far as applicable.

- The lawful rights and interests of the college community as a whole including its employees and its insurers.

e) REFERRAL GUIDELINES

When deciding whether to make a referral, following an allegation or suspicion of abuse, the head and DSL should not make their own decision over what appear to be borderline cases, but rather the doubts and concerns should be discussed with the BSCP or Social Care. This may be done tentatively and without giving names in the first instance.

What appears trivial at first can later be revealed to be much more serious, and an allegation of child abuse or neglect may lead to a criminal investigation. Thus, the college should not do anything that may jeopardise a police investigation, such as asking a student leading questions or attempting to investigate the allegations of abuse. However, if sufficient concern develops that a student may be suffering or is at risk of suffering significant harm, a referral will be made without delay.

Contact will be made with the BSCP within 24 hours of a disclosure being made. If the initial referral is made by telephone, the DSL will confirm the referral in writing within 24 hours of the initial telephone call. If no response or acknowledgment is received within three working days, the DSL will contact the BSCP or Social Care.

Contextual Safeguarding: Safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between students outside the college. All staff, and especially the DSL or deputy need to consider the context within which such incidents and/or behaviours occur. Known as contextual safeguarding, this simply means that assessments of students should consider whether wider environmental factors are present in a student's life that are a threat to the student's safety and/or welfare. Children's social care assessments should consider such factors, so it is important that the college provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. A link to further information on contextual safeguarding can be found in Appendix 2.

f) ALLEGATIONS AGAINST STAFF, VOLUNTEERS OR THE PRINCIPAL

The procedures, as set out in Part Four of KCSIE are to be followed where it is alleged that anyone working in the college, including supply teachers and volunteers has:

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

When dealing with allegations against the Principal, staff or volunteers, the college aims to strike a balance between the need to protect students from abuse, placing students first, and the need to protect the Principal, staff and volunteers from false or unfounded allegations.

Suspension will not be an automatic response to an allegation. Full consideration will be given to all the options, subject to the need to ensure the safety and welfare of the student or students concerned and the need for a full and fair investigation. Where an allegation or complaint is made against the Principal, the DSL will report to and consult immediately with the LADO, Safeguarding Governor, and/or proprietor, according to availability. This will be done without consultation with the Principal. The Safeguarding Governor and/or Proprietor, if contacted first, will make immediate contact with the LADO.

Where an allegation or complaint is made against staff, volunteers or the DSL, the Principal will be informed or, in his/her absence, the Safeguarding Governor and/or proprietor.

If a decision is taken that a member of staff is suspended during the investigation the college recognises that this does not infer guilt. Under these circumstances any suspension is a 'neutral' act and no action should be viewed as an expression of opinion or judgement. In the event of an allegation or complaint resulting in a member of staff being required not to come to college, because of suspension or other arrangements, where the college provides on-site accommodation for such a member of staff, he or she would be required to live off-site during this time. If it were not possible for offsite accommodation to be sourced by the member of staff, then the college would ensure suitable accommodation is provided.

In the event of any person (in any capacity, whether employed, contracted, a volunteer or student) leaving the college as a result of their being considered unsuitable to work with students, or who has harmed or poses a risk of harm to students, the college will report this to the Disclosure and Barring Service (DBS) promptly, within one working week. This applies equally to anyone who would have been removed from the college had he or she not left earlier. The college recognises that proprietors have a legal duty to respond to requests from the DBS for information they hold already, but do not have to find it from other sources.

If the alleged misconduct is so serious that it warrants a decision on whether the teacher should be prevented from teaching, a referral will be made to the Teaching Regulation Agency (TRA). A referral can be made in relation to anyone who is undertaking 'teaching work'. The TRA can put an interim prohibition order in place to prevent a teacher from teaching until the case has been fully investigated. The college has a statutory duty to consider referral of cases involving serious professional misconduct to the TRA and also where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons for such a referral include situations where the member of staff has been dismissed for unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction, at any time, for a relevant offence. Referrals may also be made to the TRA by the Police or the DBS. Matters reported by the college to the DBS may require a separate referral to TRA. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in 'Teacher misconduct: the prohibition of teachers (October 2015)'. Further guidance and a referral form are published on the TRA website.

The college will follow the guidance in Part 4 of KCSIE 2020 to ensure that:

- Procedures are applied with common sense and judgement (whereas before colleges had to follow the required procedures closely)
- Allegations found to be malicious are removed from personnel records (whereas before all allegations had to be retained)
- Records are kept of all other allegations but any that are not substantiated, are unfounded or malicious should not be referred to in employer references (whereas before details of all allegations had to be passed on in references).

Further detail with regards to the procedures for dealing with allegations of abuse against staff are available from the College.

g) ALLEGATIONS AGAINST STUDENTS (including Peer-on-Peer abuse)

Introduction: The college takes a firm line in relation to all possible peer-on-peer abuse, including sexual violence and sexual harassment. In all cases, the recording and investigation process is the same. Peer-on-peer abuse can take on many forms, including:

- sexual violence and sexual harassment
- physical abuse such as hitting, kicking, shaking, biting, hair pulling
- otherwise causing physical harm
- sexting
- initiating/hazing type violence and rituals

- bullying (including cyberbullying)
- upskirting
- abuse within intimate partner relationships

With regard to sexual violence and sexual harassment, the college pays due regard to Part 5 of KCSIE (2020) and the separate DfE guidance “Sexual violence and sexual harassment between students in schools and colleges”. The college holds and promotes a clear view that sexual violence and sexual harassment are never acceptable and will not be tolerated.

The college’s procedures in relation to peer-on-peer abuse follow the DfE advice to adopt a “whole college” approach, involving all staff, students, governors and parents, as part of the college’s broad approach to safeguarding. Central to such an approach are (i) staff training so that staff know what to do if they have a concern about a student and (ii) a planned curriculum and extra-curricular programme, including assemblies, which takes a preventative approach through the setting of values and standards and the promotion of the Fundamental British Values, notably in this context, of respect and tolerance. Through the wider curriculum, including Relationships and Sex Education and Personal, Social and Health Education, the college aims to provide students with an understanding appropriate to their age and stage of development of issues such as:

- healthy and respectful relationships
- what respectful behaviour looks like
- consent
- gender roles, stereotyping, equality
- body confidence and self-esteem
- prejudiced behaviour
- that sexual violence and sexual harassment are always wrong
- addressing cultures of sexual harassment.

Sexual violence and sexual harassment can occur between two students or a group of students of any age and sex. They may be physical and/or verbal and may occur online and offline. Students who are victims will likely find the experience stressful and distressing and their educational attainment could be negatively affected. The college will take all matters seriously and offer victims appropriate support. They will be considered as incidences of abuse and will not be tolerated. In particular, reports will not be allowed to be passed off, either by students or staff, as;

- banter
- just having a laugh
- part of growing up
- boys being boys

Research shows that it is more likely that girls will be the victims of sexual violence or harassment and more likely that boys are the perpetrators. Students with SEND are three times more likely to be abused than their peers. Further information is available in Part 1.4 of the DfE guidance, cited above. Such behaviour must be challenged, since it is normalised by being dismissed or tolerated.

Definitions: In this context, *sexual violence* is as defined in the Sexual Offences Act 2003. *Sexual harassment* is defined as unwanted conduct of a sexual nature that can occur wholly online and offline. Sexual harassment is likely to:

- violate a student’s dignity
- make him or her feel intimidated, degraded or humiliated
- create a hostile, offensive or sexualised environment.

Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. It can include:

- sexual comments, (such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names)
- sexual “jokes” or taunting
- physical behaviour, (such as: deliberately brushing against someone, interfering with someone’s clothes and displaying pictures, photos or drawings of a sexual nature)
- online sexual harassment, (which may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence). It may include:
 - non-consensual sharing of sexual images and videos*.
 - sexualised online bullying
 - unwanted sexual comments and messages (including on social media)
 - sexual exploitation (coercion and threats).
- upskirting; this is now a criminal offence, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

* UK Council for Internet Safety (UKCIS) sexting advice provides detailed advice for colleges and colleges; (refer to links in Appendix 2).

Harmful sexual behaviour is a term used to describe behaviour which is beyond that which is normal and developmentally expected, and can be problematic, abusive or violent. It can occur online and/or offline and should be considered in a child protection context. For further information, refer to the NSPCC guidance (see link in Appendix 2).

Handling a concern: A student reporting sexual violence or sexual harassment will be offered support and every effort will be made to ensure that his or her education is not disrupted. Reports of sexual violence and sexual harassment are likely to be complex, requiring difficult professional decisions to be made, often quickly and under pressure. Staff are provided with training to facilitate a calm and considered response to any concern.

A member of staff who receives a report of sexual violence or sexual harassment will take action in line with the standard guidance for dealing with disclosures, as identified in this policy. As with all concerns about the welfare of a student, all staff should act in the best interests of the student. The student making the report will be reassured, supported, taken seriously and kept safe. He or she should never be given the impression that reporting causes a problem, or be made to feel ashamed for making a report. In some cases, a third party, such as a friend, rather than the victim, may make the report. In such cases the same procedures will be followed, and it is important that the college understands why the victim has chosen not to make the report personally.

In overseeing the management of the concern, the DSL will consider, in line with overall safeguarding guidance, whether a referral should be made to children’s social care and, where a crime may have been committed, will make a referral to the police.

The principles for handling a report of sexual violence or sexual harassment remain the same if the incident is alleged to have taken place off the college premises, or to have involved students from more than one school or college. In the latter case, appropriate information sharing and effective multi-agency working are especially important.

If possible, a report will be managed with two members of staff present, (preferably one of them being the DSL or deputy). However, this might not always be possible. The DSL should be informed as soon as practically possible, if he or she is not involved in the initial report. If the report involves illegal images of students, it is a key consideration that staff should not

view or forward such images. If viewing such an image is unavoidable, the UKCIS advice (see link in Appendix 2) provides more details on what to do.

When there has been a report of sexual violence, the DSL or 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 his or her protection and support
- the alleged perpetrator
- all the other students (and, if appropriate, adult students and staff) at the college

The risk assessment will be recorded and kept under constant review. Full details of the matters for the DSL to consider in managing a report are given in paragraph 61 onwards of the DfE guidance cited above. In summary these are:

- the wishes of the victim in terms of how he or she wants to proceed
- the nature of the alleged incidents
- the ages and developmental stages of the students involved
- any power imbalance between the students
- whether the incident is a one-off or a sustained pattern of abuse
- any ongoing risks to the victim
- any other related issues and wider context

The college may decide that the students involved do not require statutory interventions but may benefit from early help, as noted earlier in this policy, in which case, the process will be followed, as described in “Working Together to Safeguard Children”. In all situations, concerns, discussions, decisions and reasons for decisions will be recorded, according to normal safeguarding procedures.

Supporting the victim; further guidance: Further information and useful links to additional documentation can be found at paragraph 66 of the DfE guidance.

Safeguarding and supporting the alleged perpetrator: Due consideration will be given to the support and safeguarding needs of the alleged perpetrator. Students abusing other students may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of the college. The college will consider the balance of safeguarding the victim and providing the alleged perpetrator with an education, safeguarding support as appropriate and implementing any disciplinary sanctions. These will be considered on a case-by-case basis. A student against whom an allegation of abuse has been made may be suspended from the college during the investigation, as determined by the Principal in discussion with the DSL. Careful liaison with children’s social care and the police, as appropriate, will aim to ensure that any action taken by the college will not prejudice an investigation and/or any subsequent prosecution. It is also important to remember that, as a child, any alleged perpetrator is entitled to, deserving of, and should be provided with, a high level of support to help understand and overcome the reasons for such behaviour and help protect other students by limiting the likelihood of abusing again. The college will work with professionals as appropriate to provide support and to help alleged perpetrators understand and overcome the reasons for their behaviour and help protect other students by limiting the likelihood of them abusing again. Disciplinary action and appropriate support are not mutually exclusive; they can and should occur at the same time, where necessary.

In addition to the procedures in this policy, the college’s policy on behaviour, discipline and sanctions will apply. A bullying incident will be treated as a child protection concern when there is reasonable cause to suspect that a student is suffering, or likely to suffer significant harm.

Working with parents: The college will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence, though this might not be necessary or proportional in the case of sexual harassment. This will be considered on a case-by-case basis. The exception to this requirement is if there is a reason to believe that informing a parent or carer will put a child at additional risk. Careful consideration, based, where appropriate, on advice from relevant agencies, will be given to what information is provided to the respective parents or carers about the other student involved and when this is provided. Further details on working with parents can be found in the DfE guidance, starting at paragraph 71.

Safeguarding other students: The college will consider carefully the safeguarding needs of other students, particularly any who may need support due to having witnessed sexual violence. Following an incident, it is likely that other students will 'take sides' and the college will be vigilant to do all it can to ensure that the victim, alleged perpetrator and any witnesses are not bullied or harassed, including via social media.

h) SUSPECTED HARM FROM OUTSIDE THE COLLEGE:

A member of staff who suspects that a student is suffering harm from outside the college should seek information from the student with tact and sympathy using "open" and not leading questions (see TED questions, in a), above). A sufficient record should be made of the conversation and given to the DSL.

i) STUDENTS WITH SEND

Students with SEND can face additional safeguarding challenges and there may be additional barriers to recognising abuse and neglect in this group of students. This may include

- Assumptions that indicators of possible abuse such as behaviour, mood or injury relate to the student's disability without further exploration
- Students with SEND being disproportionately impacted by issues such as bullying without showing any outward signs
- Students with SEND being unable to communicate instances of possible abuse

The college's behaviour and anti-bullying policies make specific reference to dealing appropriately with SEND. Staff should be vigilant in relation to the bulleted points above, reporting any concerns to the DSL.

j) LOOKED AFTER AND PREVIOUSLY LOOKED AFTER CHILDREN

The most common reason for children becoming 'looked after' is as a result of abuse and/or neglect. The college's proprietor ensures that staff have the skills, knowledge and understanding to keep looked after children and previously looked after children (since they remain vulnerable) safe. In particular, this involves ensuring that appropriate staff have the information they need in relation to a student's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. Staff should also have information about the student's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The DSL should have details of the student's social worker. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these students. Where there is a looked after, or previously looked after child at the college, a designated teacher will be appointed, who will work with local authorities to promote the educational achievement of such students. The college has appointed Jeffrey Guille, SENco as designated teacher for looked after children. He will also have responsibility for promoting the educational achievement of students who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. The college will provide appropriate training for such a role.

k) PROMOTING THE EDUCATIONAL OUTCOMES OF VULNERABLE CHILDREN

The DSL has a particular responsibility to oversee the welfare and educational outcomes of vulnerable children and to liaise with relevant staff to ensure that they are kept up to date and best able to further the learning and well-being of vulnerable children. In this context, the DSL will:

- Share information about welfare, safeguarding and CP issues with teachers and leaders
- Have a particular focus on students with social workers
- Ensure staff know who these students are
- Understand these students' academic progress and attainment
- Maintain a culture of high aspirations for this cohort
- Support teaching staff to identify challenges they may face and the academic support and adjustments that could be made.

The college promotes clear lines of communication for information sharing between the DSL and teachers in relation to vulnerable students, including any with a protected characteristic. Similarly, where a child is in foster care or living in a children's home, the DSL will sustain lines of communication with the foster carers/children's home manager.

The college recognises that children with social workers may continue to be vulnerable and be educationally disadvantaged in attendance, learning, behaviour and mental health. It expects Local Authorities to routinely share the fact a student has a social worker and that the DSL should hold and use this information. Such information also informs the response to further safeguarding concerns (e.g. absence, missing) and support

Staff recognise that when a student has a social worker, it is an indicator that the he or she is more at risk than most students. This may mean that he or she is more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. The college takes these needs into account when making plans to support students who have a social worker.

5. SUPPORTING THE STUDENT AT RISK

The college recognises that students who are abused or witness violence may find it difficult to develop a sense of self-worth and to view the world as benevolent and meaningful. They may feel helplessness, humiliation and some sense of self-blame. The college may be the only stable, secure and predictable element in the lives of students at risk. However, when at college their behaviour may be challenging and defiant and they may be withdrawn.

The college will endeavour to support the student through:

- The content of the curriculum to encourage self-esteem and self-motivation.
- The PSHE programme, through which students will, according to their age and stage of development, learn to develop a healthy, safer lifestyle by being able to:
 - Recognise and manage risks in different situations and then decide how to behave responsibly.
 - Judge what kind of physical contact is acceptable and unacceptable.
 - Recognise when pressure from others (including people they know) threatens their personal safety and well-being and develop effective ways of resisting pressure, including knowing when and where to get help.
 - Be assertive to help resist unhelpful pressure.
- The college ethos, which promotes a positive, supportive and secure environment and gives students a sense of being valued.

- The college behaviour policy, which is aimed at supporting vulnerable students in the college. The college will ensure that the student knows that some behaviour is unacceptable and that they are valued and not to be blamed for any abuse which has occurred.
- The PSHE programme, assemblies and other occasions, together with the watchfulness of staff and the training they receive, in respect of issues such as mental health, body image, eating disorders, female genital mutilation (FGM), self-harm and radicalisation. (refer also to Section 14)
- Liaison with other agencies who support the student such as Social Services, Child and Adult Mental Health Service, Education Welfare Service and Educational Psychology Service.
- Close monitoring of attendance, identifying patterns and concerns relating to students missing from college.
- The careful vetting of the visiting speakers to ensure that the content of what they intend to say is appropriate in relation to the college's ethos and Fundamental British Values.
- Drawing up a child protection plan, in consultation with other agencies, if appropriate, to identify strategies to assist a student.
- Keeping records and notifying the BSCP or Social Care, as appropriate, as soon as there is a recurrence of a concern.
- The appropriate transfer of information to the next school, college or university when a student on the child protection register leaves the college. If the college does not know where a student has moved to, the LADO will be contacted as soon as possible.
- The appropriate transfer of information to a new college when a student leaves, whenever the college has recorded child protection concerns.
- When required, the college will contribute to inter-agency working, as noted in the statutory guidance, *Working Together to Safeguard Children 2018*, providing, for example, an offer of help and/or by contributing towards an inter-agency assessment, in accordance with the Children Act 1989, to ensure a co-ordinated offer of early help when additional needs of students are identified. The college will contribute to inter-agency plans to provide additional support to students subject to child protection plans and will allow access for Children's Social Care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a Section 17 or Section 47 assessment. For further information see KCSIE 2020, and *Working Together to Safeguard Children July 2018*; (see links in this policy in Appendix 2).

The college recognises the requirement for teachers* to report to the police any cases or suspected cases of FGM. Nevertheless, all staff should liaise with the DSL with regard to any concerns about FGM (unless there is a reason not to do so). The police will be informed and Children's Social Care involved, as appropriate. At no time will staff examine students to confirm this.

* "Teachers", here refers to anyone undertaking 'teaching work', as defined in The Teachers' Disciplinary (England) Regulations 2012, as explained in the ISI commentary on the regulations. This definition includes such persons as teaching assistants, sports coaches and visiting instrumental music staff.

6. A SAFE ENVIRONMENT

The college recognises the need to provide a safe environment in which students can learn and develop. To facilitate this, the college will:

- Assess college activities and all areas of the college for risk and keep records.
- Ensure appropriate security at all points of access to the premises
- Not lock internal doors in areas being used by students

- Fit, where possible, glass panels into the doors of classrooms, music practice rooms and other appropriate areas, particular in areas where one-to-one tuition takes place
- Ensure that all visitors to the college are required to sign in at reception on arrival. Visitors will be required to wear their identity badges or be issued with college visitor badges upon verification of their identity
- Ensure that staff are vigilant and will either report unidentified visitors immediately to the college office or challenge the person directly if safe to do so. At times when the office is closed, staff should alert the Principal or other senior staff on duty
- Be aware that there are occasionally times when large numbers of unknown visitors may be on site (e.g. sports fixtures, open mornings, plays or concerts). On these occasions, it is not expected that all these visitors will wear badges and only visitors found in areas inappropriate to the event or whose behaviour causes concern will be reported or challenged.
- Ensure that all staff are aware of the 'Policy for management, including identification, of visitors into the college site', as outlined in the 'Health and Safety Policy'

7. THE DSL

The college has appointed an experienced and suitably qualified member of staff who is the member of the Senior Leadership Team as DSL to be responsible for matters relating to child protection and welfare and a DDSLs with similar training, to act in his or her absence and take the lead should an allegation be made against the DSL.

The DSL and deputy/ies develop a complete safeguarding picture and are the most appropriate people to advise on the response to safeguarding concerns. The responsibilities of the DSL and DDSLs are provided in job descriptions specific to this aspect of their college role. (College needs to ensure that the DSL's have a full job description which, as a minimum, includes all matters covered in KCSIE Annex B) They include;

- Being conversant with the LSP procedures and the role of other agencies.
- Following the college's safeguarding and child protection policies and co-ordinating child protection procedures in the college.
- Being the first point of contact for parents, students, teaching and non-teaching staff and external agencies in all matters of child protection.
- Consulting with the Safeguarding in Education Team (or equivalent body within your LA) or Social Care (or equivalent body within your LA), or LADO, as appropriate, on issues if an allegation or suspicion occurs and liaising with the various child protection agencies where appropriate.
- Keeping the Principal informed of all actions unless the Principal is the subject of an allegation. In this situation, the DSL should consult with the Safeguarding Governor or proprietor.
- Co-operating with any police and LADO investigations.
- Liaising with the Principal and Safeguarding Governor regarding training for all who work at the college on child protection issues.
- Attending appropriate higher level training every two years supplemented by informal updates as required, but at least annually.
- Undertaking training to facilitate the recognition of the additional risks that students with SEND face online, for example, from online bullying, grooming and radicalisation and ensure confidence in the capability to support SEND students to stay safe online.
- Keeping appropriate records, sharing these with agencies as and when appropriate. Data protection considerations must not be a barrier to sharing information where the failure to do so would result in a student being placed at risk of harm.
- Having a role in the oversight of the college's online safety provision, the teaching of online safety and the quality of the college's filtering and monitoring
- Supporting staff.

- Take responsibility, when a student leaves the college, for ensuring that the child protection file is transferred securely to the new school, college or university as soon as possible and obtaining confirmation of receipt. Such a transfer of information should be separate from the main student file. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school, college or university in advance of a student leaving. For example, information that would allow the new institution to continue supporting victims of abuse and have that support in place for when the student arrives. As a recipient of a child protection file from a previous college, the DSL must ensure that key staff, including the SENCO, are made aware as required and relevant.

8. HELPING A STUDENT WHO WANTS TO TELL YOU ABOUT ABUSE

Staff should remember that the priority is to protect the student;

- Take the matter seriously
- React calmly and listen carefully
- Observe but do not judge
- Don't stop the student who is freely recalling significant events
- Reassure the student that he or she has done the right thing in telling you
- Indicate the action you will take and make it clear that you will have to tell the DSL (you cannot promise confidentiality - no secrets)
- If the student comes back to talk at a later stage, don't comment or advise; ensure that you listen, record and reassure the student.

As a member of staff, it is essential to remember not to:

- Drag the student to the DSL – this could be interpreted as abusive in itself
- Contact the parents yourself
- Interrogate the student or ask leading questions
- Speak to anyone about whom allegations are made, including colleagues
- Promise confidentiality
- Ask a student outright if he or she or others have suffered abuse
- Criticise the alleged perpetrator.

9. TEN KEY POINTS TO FOLLOW IF YOU SUSPECT, OR ARE TOLD OF, ABUSE:

The following guidelines, compiled by Dr Roger Morgan OBE (former Children's Rights Director), may be helpful:

Adults looking after students or young people in colleges (or in residential establishments or youth organisations) should be aware of the risks of abuse (by adults or other young people) and take steps to reduce those risks. Adults (staff or volunteers) in charge of childrens or young people should know what to do if they suspect that someone is being abused, or if someone tells them that this is happening. The following key points give a guide on what to do and not to do:

1. Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse.
2. If you can, write brief notes of what they are telling you while they are speaking (these may help later if you have to remember exactly what was said) – and keep your original notes, however rough and even if you wrote on the back of something else, (it's what you wrote at the time that may be important later – not a tidier and improved version you wrote up afterwards). If you don't have the means to write at the time, make notes of what was said as soon as possible afterwards.
3. Do not give a guarantee that you will keep what is said confidential or secret – if you are told about abuse, you have the responsibility to tell the right people to get something done about it (see below). If asked, explain that you are going to tell the people who can provide help, but that you will only tell people who absolutely have to know.

4. Don't ask leading questions that might give your own ideas of what might have happened (e.g. "did he do X to you?") – just ask "what do you want to tell me?" or "is there anything else you want to say". Refer to the TED questions in 4(a) above.
5. Immediately tell the DSL (unless they are themselves accused or suspected of abusing, in which case this must be reported to the principal) – don't tell other adults or young people what you have been told.
6. Discuss with the DSL whether any steps need to be taken to protect the person who has told you about the abuse (this may need to be discussed with the person who told you).
7. Never attempt to carry out an investigation of suspected or alleged abuse by interviewing people etc – social services and police staff are the people trained to do this – you could cause more damage and spoil possible criminal proceedings.
8. As soon as possible the DSL should refer the matter to the local social services department (helped by your notes). Follow their requests about what to do next. They will set up any necessary investigations, and can advise you.
9. Never think abuse is impossible in your college, or that an accusation against someone you know well and trust is bound to be wrong.
10. Children and young people often tell other young people, rather than staff or other adults, about abuse – make sure that senior young people know how to behave if they suspect, or are told of abuse.

10. SAFE WORKING PRACTICE: CODE OF CONDUCT FOR STAFF

Staff, volunteers and helpers need to think and act carefully to avoid situations that could lead to difficulties or embarrassment or accusations. The following points are intended to provide some guidance:

- All who work with students must ensure that the students feel equally valued; favouritism, real or inferred, causes feelings of alienation and can be misconstrued.
- Staff who have concerns about the conduct of others, in respect of their engagement with students, should have the confidence that they are safe to raise their concerns and their view will be taken seriously. Staff should refer to and follow the procedures detailed in the whistleblowing policy.
- Staff should not take students out on their own and refrain from forming personal relationships exclusively with one individual.
- Staff should take care that all electronic communication with students is wholly appropriate, does not constitute a breach of trust and is in accordance with online safety guidance included in Section 11 of this policy. Staff must not befriend students on social networking sites.
- Conversations and behaviour should be friendly but not over familiar. Young people are more comfortable with an adult in role than an adult who seeks to be 'one of the gang'.
- Responsible and appropriate use of authority provides stability and security.
- All students should be treated with dignity and respect in attitude, language use and actions.
- Respect the privacy of the students.
- Avoid questionable activity e.g. rough, sexually provocative games and comments.
- Ensure that correct safeguards are in place to cover 'one-to-one' situations. This may include individual coaching, instrumental music tuition, administering of first aid, conveying students by car etc. One-to-one situations have the potential to make a student more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one-to-one situations with students may also be more vulnerable to unjust or unfounded allegations being made against them.
- Make sure that the only people allowed into an activity are the adults assigned to the group. You should not allow others to have free access unless they have a specific reason e.g. guest speaker, maintenance person.
- Physical contact should reflect the student's need not the adult's.

- Physical contact should be age appropriate and generally initiated by the student, not the adult.
- Physical contact should take place only in public.
- Students have the right to decide how much physical contact they have with others, except in exceptional circumstances, such as when they need medical attention.
- Any act of restraint involving physical contact must be recorded in writing and the Principal notified immediately. The Principal will notify parents on the same day, or as soon as practicable thereafter. In the event the Principal is involved this should be passed to the Safeguarding Governor or Proprietor. A record of such incidents will be kept.
- Physical contact must be in accordance with the college policy on reasonable force and physical restraint, further details of this can be found in Section 14 of this policy, below.
- Staff should monitor one another in the area of physical contact. They should be free to help each other by pointing out anything that could be misunderstood.

More detailed information is available to all staff through the document 'Guidance for safer working practice for adults who work with children and young people', (see Appendix 2) The guidance identifies many key areas where adults can protect themselves from allegations.

11. ONLINE SAFETY POLICY

The College believes in the educational benefits of curriculum Internet use. Good planning and management that recognises the risks will help to ensure appropriate, effective and safe student use. In delivering the curriculum, teachers need to plan to integrate the use of communications technology such as web-based resources and e-mail in order to enable students to learn how to locate, retrieve and exchange information using ICT. Computer skills are vital to access life-long learning and for future employment.

Most technologies present risks as well as benefits. Internet use for home, social and leisure activities is expanding and being used by all sectors of society. This brings young people into contact with a wide variety of influences, some of which could be unsuitable. It is important that the college, as well as parents, adopt strategies for the responsible and safe use of the Internet.

Core Principles of Internet Safety

The Internet has become commonplace and its effective use is an essential life-skill. Unmediated Internet access brings with it the possibility placing of students in embarrassing, inappropriate and even dangerous situations. This policy aims to help to ensure responsible use and the safety of students. It is built on the following five core principles:

Guided educational use

Significant educational benefits should result from curriculum Internet use including access to information from around the world and the ability to communicate widely and to publish easily. Internet use should be planned, task-orientated and educational within a regulated and managed environment. Directed and successful Internet use will also reduce the opportunities for activities of dubious worth.

Risk assessment

21st Century life presents dangers including violence, racism and exploitation from which children and young people need to be protected. At the same time they need to learn to recognise and avoid these risks – to become "Internet Wise". Students need to know how to cope if they come across inappropriate material.

Responsibility

Internet safety depends on staff, colleges, governors, advisers, parents and, where appropriate, the students themselves taking responsibility for the use of Internet and associated communication technologies. The balance between education for responsible use, regulation and technical solutions must be judged carefully.

It is acknowledged that, whilst the college provides students with a protected environment for Internet usage in college, the students may not benefit from the same level of protection in their access to the Internet beyond the confines of the college. KCSIE makes it clear that the school's consideration for online safety should now also include how children will be kept safe when they are accessing online learning whilst out of college. Important aspects of the college's e-safety provision are, therefore, the development of the students' understanding of keeping safe online when not at college, and supporting parents in understanding how to help keep their students safe online.

The principal, DSL and DDSLs are responsible for ensuring, so far as is reasonably practicable, a safe environment for internet use, for the implementation of policy and for the development of the students' understanding of how to keep themselves safe online, both in and out of college.

The ICT Manager is responsible for the maintenance of hardware and software systems and technology to ensure, so far as is reasonably practical, safe use of the internet.

The ICT co-ordinator is responsible for overseeing the successful development, both in ICT lesson and the wider curriculum and extra-curricular activities, of students' understanding of how to keep safe online and for supporting staff in implementing this objective.

All staff and volunteers are responsible for monitoring students' safety online and reporting any concerns arising from students' internet use, either at college or at home, and for supporting the development of the students' understanding of how to keep themselves safe online.

Regulation

The use of a limited and expensive resource, which brings with it the possibility of misuse, must be regulated. In some cases access within college is denied, for instance unmoderated chat rooms present immediate dangers and are banned. Fair rules, clarified by discussion and prominently displayed help students make responsible decisions for both college and home access.

Appropriate strategies

This document describes strategies to help to ensure responsible and safe use. They are based on limiting access, developing responsibility and on guiding students towards educational activities.

There are no straightforward or totally effective solutions and staff, parents and the students themselves must remain vigilant.

1) The Importance of Internet Use

- The purpose of Internet use in college is to raise educational standards, to promote student achievement, to support the professional work of staff and to enhance the college's management information and business administration systems.
- Internet use is a part of the statutory curriculum and a necessary tool for staff and students.
- The Internet is an essential element in 21st Century life for education, business and interaction. The college has a duty to provide students with quality Internet access as part of their learning experience.

2) How the Internet benefits education

Benefits of using the Internet in education include:

- access to world-wide educational resources including museums and art galleries;
- educational and cultural exchanges between students world-wide;
- cultural, vocational, social and leisure use in libraries, clubs and at home;
- access to experts in many fields for students and staff;
- staff professional development through access to national developments, online training, educational materials and good curriculum practice;
- communication with support services, professional associations and colleagues;
- improved access to technical support including remote management of networks.

3) How Internet use enhances learning

- The college Internet access is designed expressly for student use and includes filtering appropriate to the age of the students.
- Students will be taught what is acceptable and what is not acceptable and given clear objectives for Internet use.
- Internet access will be planned to enrich and extend learning activities. Access levels will be reviewed to reflect the curriculum requirements and age of students.
- Staff will guide students in on-line activities that will support the learning outcomes planned for the students' age and maturity.
- Students will be educated in the effective use of the Internet in research, including the skills of knowledge location, retrieval and the evaluation of the reliability and trustworthiness of content.

4) Student's Understanding of how to keep safe online

The college develops the students' understanding of how to keep safe online, as part of a broad and balanced curriculum, and their resilience in protecting themselves and their peers in the following ways:

- **Section included in the Welcome pack/Re-enrolment pack regarding online safety**

5) Students' Evaluation of Internet content

Inappropriate material should not be visible to students using the Internet. This is not easy to achieve and cannot be guaranteed. It is a sad fact that students may be confronted with inappropriate material, despite all attempts at filtering. Students will be taught what to do if they experience material that they find distasteful, uncomfortable or threatening. For example, to close the page and report the URL to the teacher or ICT manager for inclusion in the list of blocked sites. More often, students will be judging reasonable material but selecting that which is relevant to their needs, for instance to answer an assignment question. Students should be taught research techniques including the use of subject catalogues and search engines. They will be encouraged to question the validity, currency and origins of information – key information handling skills. They should also use alternative sources of information for comparison purposes. Effective guided use will reduce the opportunity students have for exploring unsavoury areas. Using Internet derived materials in students' own work requires at least an understanding that straight copying is worth little without a commentary that demonstrates the selectivity used and evaluates significance. Respect for copyright and intellectual property rights, and the correct usage of published material needs to be taught.

- If staff or students discover unsuitable sites, the URL (address) and content must be reported to the Internet Service Provider via the ICT co-ordinator.
- The use of Internet derived materials by staff and by students in college must comply with copyright law.
- Students are taught to be critically aware of the materials they read and shown how to validate information before accepting its accuracy.
- Students will be taught to acknowledge the source of information and to respect copyright when using Internet material in their own work.

6) Management of e-mail

- Students may use only approved e-mail accounts on the college system.
- Students must immediately tell a teacher if they receive offensive e-mail.
- Students must not reveal details of themselves or others, such as address or telephone number, or arrange to meet an unknown person in e-mail communication.
- Access in college to external personal e-mail accounts is not allowed except where a teacher has specifically requested it, for example, to retrieve a piece of work emailed from home.

7) Management of Website content

- The point of contact on the Website is the college address/college e-mail and telephone number.
- Staff or students' home information will not be published.
- Website photographs that include students will be selected carefully and will not enable individual students to be identified.
- Students' full names will not be used anywhere on the Website, particularly associated with photographs.
- For students aged under 18, written permission from parents or carers will be obtained before photographs of students are published on the college Website.
- The copyright of all material must be held by the college, or be attributed to the owner where permission to reproduce has been obtained.
- The college undertakes appropriate measures for the management of personal data which is stored electronically.

8) Newsgroups and chat

- Students will not be allowed access to public or unregulated chat rooms in college.
- Newsgroups will not be made available unless an educational requirement for their use has been demonstrated.
- A risk assessment will be carried out before students are allowed to use a new technology in college.

9) Management of emerging Internet uses

- Emerging technologies will be examined for educational benefit and a risk assessment will be carried out before use in college is allowed.

10) Liaison and partnership with parents

- Parents have access to this online safety policy on the college website and can request a paper copy from the college office.
- Parents will be informed that students will be provided with supervised or remotely supervised Internet access.
- Parents and students will be asked to sign and return a consent form.
- Periodically the college runs online safety information meetings for parents, which may involve an external speaker, in order to raise their awareness of online safety matters and help them develop their children's safe use of the Internet.
- Copies of template agreements for students and parents are found in Appendix 3 of this policy.

11) Assessing the risks of Internet Use and Management of filtering

- In common with other media such as magazines, books and video, some material available via the Internet is unsuitable for students. The college will take all reasonable precautions to ensure that users access only appropriate material. However, due to the international scale and linked nature of Internet content, it is not possible to guarantee that unsuitable material will never appear on a college computer.
- Methods to identify, assess and minimise risks will be reviewed regularly.

- The principal will ensure that the Internet policy is implemented and compliance with the policy monitored.
- The college will work in partnership with parents, the DfE and our Internet Service Provider to ensure systems to protect students are reviewed and improved.
- The college will ensure that appropriate IT filters and monitoring procedures are in place to safeguard students from potentially harmful and inappropriate material online without unreasonable 'overblocking'.
- As part of the above the college considers carefully how to manage the access to 3G and 4G on the college premises; this does not mean banning mobile devices; the college considers how mobile phone use is managed and how filters may be supplemented with behaviour management.

12) Introduction of the policy to students

- Rules for Internet access are posted near computer systems.
- Students are informed that Internet use will be monitored.
- Instruction in responsible and safe use precedes Internet access.

13) Staff consultation and training

- The college ensures that all staff have undertaken appropriate online safety training, as expected in KCSIE
- All staff must have familiarised themselves fully with this policy before using any Internet resource in college.
- All staff, including teachers, supply staff, assistants and support staff, are provided with the College Internet Policy, and its importance explained.
- Staff development in safe and responsible Internet use, and on college Internet policy will be provided as required. Induction training in safeguarding for new staff includes online safety.

14) Technical provision, filters, safeguards and monitoring

Internet filtration provided by ISP Vodafone.

15) Maintenance of ICT system security

- The college ICT systems are reviewed regularly with regard to security in conjunction with 848 Group.
- Virus protection will be installed and updated regularly by 848 Group.
- Memory sticks and other such portable storage devices may be brought into college only when specific permission has been given.
- Unapproved system utilities and executable files will not be allowed in students' work areas or attached to e-mail.

12. MOBILE PHONES AND CAMERAS POLICY

1. Use of Cameras and the manipulation and storage of images

In this policy terms such as 'photography', 'pictures', 'images', 'camera', 'device' and 'digital technology' include both still and video media. The term 'camera' includes mobile phones, ipads and other equipment which has the capacity to take photographs.

At Edgbaston College we recognise that the appropriate use of photography enhances many aspects of college life and the students' education. Mobile phone technology has become more sophisticated over recent years and will continue to evolve. Wireless connections in particular, extend the capabilities of mobile phones further; which allow access to new content and services, such as the internet, social networking sites and instant messaging. Many mobile phones offer camera, video and audio recording as standard. Mobile phones, alongside other technologies aim to change the way we communicate. This speed of communication

often provides security and reassurance; however, as with any other form of technology, there are associated risks.

This policy is intended to ensure an environment in which students, parents and staff are safe from images being recorded and inappropriately used by providing a clear framework to ensure that

- the use of cameras and the storage of images reflect good practice
- the safeguarding needs of the students are met
- staff are not distracted from their work with students.

The policy also recognises that learning to use digital technology is an important part of the curriculum. For example, teaching needs to ensure that students are able to learn how to use digital cameras and to edit and store photographs with an understanding of safeguarding requirements, for themselves and others, which is appropriate for their age and taking due account of the cyber-bullying aspects of the college's anti-bullying policy. Reference should also be made to the college's Online Safety Policy (see Section 11 above) and planning for teaching internet safety.

Photography is used at the college for a variety of purposes, including:

- Recording students' achievements, learning and progress.
- Contributing to each student's profile.
- Providing evidence to support students' application for entrance/scholarship to their future places of education.
- Recording college events and providing material for displays.
- Communication with parents, for example providing prompt information on their children's activities on residential trips.
- For publicity purposes (brochures, prospectus, media articles, website etc.).
- To support work undertaken by members of staff or students on placements for training and gaining further qualifications.

On their child's admission to the college, parents are asked to sign a consent form in relation to their child being photographed at college or during college events. The form provides for parents to give permission at different levels (for example to consent to their child being photographed to record achievement and progress, but not for publicity purposes. The form also gives parents the opportunity to state whether a child in a photograph can be named. A copy of the consent form can be found at Appendix 4.

Responses to the photography consent form are collated and the summary can be consulted by staff at the college office. It is important that staff familiarise themselves with this information. If parents withhold consent for certain aspects of photography in relation to their child, this must be respected. Images should be checked to determine whether photographs have been taken which inadvertently include students for whom consent has not been given. If this is the case, images should be destroyed, cropped or otherwise edited to ensure that parental consent is respected. If an image is edited for this reason, the original must be destroyed.

Periodically, professional photographers visit the college by arrangement to take portrait photographs and formal pictures of events, sports teams etc. Care should be taken that parental consent is respected and also that parents have not unintentionally withheld consent regarding such photographs. Any areas of doubt should be discussed with the Principal, who will arrange for parents to be contacted as appropriate. It is not compulsory for students to be included in portrait and team photography, nor is there any obligation on parents to purchase the resulting photographs.

From time to time a teacher, student or trainee teacher on placement may undertake a case study of a student, for example, as part of a training course to gain a qualification. In such situations, parental consent with regard to photography must be respected. Case studies will only be undertaken following prior written consent from the parent or carer and, except by prior arrangement between the principal and the parent/carer, the student's name will be changed in the case study to protect his or her identity.

Occasionally a photograph may be taken which inadvertently catches a student in an unfortunate, embarrassing or compromising position. If this is the case, the image and any copies of it must be destroyed immediately.

Photography by parents

It is very difficult to police the use of cameras by parents, for example at events or on the touchline at sports fixtures. However, if members of staff have concerns about the suitability of photography by parents, they should consult the Principal, who will consider the situation with reference to this policy and the college's safeguarding procedures and take appropriate action. Concerns will be taken seriously, logged and investigated appropriately.

The parents' handbook includes guidelines for parents on the use of photography at college events.

Any parent who works at the college, for example as a volunteer, must abide by this policy. The teacher responsible (for example the Trip Leader for an educational visit which uses parent volunteers) must ensure that the parents involved are aware of this policy and abide by it.

If parents wish to make a video recording of a college event, prior permission must be obtained from the Principal, who will consider the situation with respect to this policy and the levels of consent given by parents of other students involved. Since it is difficult to ensure that parental consent is respected in these situations, and not appropriate to share the details of consent given for particular students with other parents, the Principal may refuse permission for a video recording of the event to be made. As an alternative, the college may make an official video recording, the editing of which, before it is made available to parents, will ensure that parental consent is respected.

Use of equipment

Except with specific permission from the Principal, staff may not use their own cameras, phones or other equipment to take pictures in college or at college events. A college camera is available for each year group in the college for this purpose. Cameras are kept in secure storage and should be signed out and back in when used. Please ensure that batteries are recharged as appropriate for the next user. Users bringing personal devices in to the college must ensure there is no inappropriate or illegal content on the device. Staff must ensure that this policy is observed when using other equipment which can be used in connection with photographs (photocopier, scanner, printer, ipads etc.)

Editing and storage of photographs

All images taken by members of staff or volunteers at college or on college activities remain the property of the college. The college may require images to be deleted or edited as appropriate and may also select images taken by members of staff or volunteers for other purposes, with due attention paid to the requirements of this policy.

When editing images, staff must take due professional care and ensure that edited images do not mislead or misrepresent. Care must also be taken to ensure that images do not result in their subject being vulnerable to embarrassment, teasing, bullying or abuse.

Close attention must be paid to the storage of images, particularly whilst kept on portable media such as flash cards and memory sticks. Staff are responsible for the security of such media and the images they contain and must take all reasonable measures to ensure that they are kept safe and do not come into the possession of unauthorised people.

Images must at all times be kept on college equipment and storage media and not transferred to personal devices or personal internet storage facilities. Where consent has been given to use personal devices, images must not be stored permanently on personal devices or storage media. Members of staff may transfer images to personal equipment for the purposes of sorting and editing but they must be transferred into the college's photograph archive and deleted from personal equipment at the earliest opportunity.

All images must be stored permanently only in the college's photograph archive on the college intranet (except where they form part of other approved college documentation, such as a record of achievement, display, brochure or official website or social media page), where they will be monitored by the DSL and Principal. Once sorted and edited, images must be transferred to the archive and deleted from other personal and college equipment and temporary storage media.

To maintain security and enable subsequent users to work effectively, images on flash cards and other portable media and in personal cloud storage areas must be deleted once they have been transferred. Similarly, where cameras have the capacity to save images without the need for a removable card, these must be deleted after use.

Unless specific prior consent has been obtained, members of staff and volunteers must not post college images on personal pages of social networking sites or other websites. The use of images on the college's official social media pages, website and other approved sites is carefully monitored by the DSL to ensure that it is in line with this policy and parental consent. Staff must be vigilant in respect of any inappropriate use by students of college images or their own photographs of college events on social networks and must report any concerns to the DSL.

The DSL is responsible for liaising with the chair of the parents' association (or other delegated member of the association) to ensure familiarity with this policy and that images used on the association's Social media pages and in newsletters and other literature and media abide by this policy and respect the levels of consent given by parents in relation to photography.

Final responsibility for the appropriate use of photography at college and in connection with college events rests with the Principal and the DSL. They monitor college images and may require an image to be deleted, edited or removed from a particular document, website etc in accordance with the requirements of this policy.

The college assesses the risk of access to archived images by inappropriate individuals to be very low. Staff and volunteers must ensure that their use and storage of images maintains a similarly acceptable low level of risk.

2. Use of mobile phones by members of staff and by volunteers in college

Mobile phones provide many benefits to college life, notably in improving health and safety through better communication with staff in more remote parts of the college campus and on off-site visits. However, mobile phones, particularly those capable of taking pictures, also present a challenge to the college community to ensure that students are safeguarded in relation to the potential for improper use and also that their education is not impeded by the use of mobile phones at inappropriate times.

The college handbook provides information on the use of mobile phones by students. Staff must be vigilant to ensure that the use of mobile phones, including their use by volunteers, visitors and students is always appropriate and that the safeguarding needs of the students are met. Any concerns should be discussed with the Principal or DSL. Concerns will be taken seriously, logged and investigated appropriately. Where a member of staff, visitor, volunteer or student has a mobile phone with the facility to take pictures, its use is subject to the policy on the use of cameras and the manipulation and storage of images, above.

- On arrival at college, staff should switch their phones off to ensure that they do not adversely affect their duties at college and the students' education.
- In cases of emergency (for example a seriously ill relative) mobile phones should be left in the office, office staff should be alerted and the phone can be left switched on so that a message can be relayed.
- Staff may use their phone at break times and lunch time provided that (i) students are not present, (ii) they are not on duty and (iii) this does not prevent them from responding to a request for assistance from another member of staff or other aspects of their professional duties.
- The college nurse, maintenance man and principal are exempt from the restrictions on the use of mobile phones whilst on duty so that they can be contacted at all times by the college office in case of emergency.
- College mobile phones are available from the college office. A college phone must be collected by members of staff engaged in particular college activities where it is important to maintain communication with the college office. These include:
 - Use of local offsite facilities – swimming pool, theatre, church,
 - Edgbaston College sports facilities
 - Lessons at more remote parts of the college campus – sports fields, music annexe, etc.
 - Educational visits and away sports fixtures
 - When on duty at the college gate at the beginning and end of the college day
 - Situations where, by prior arrangement with the principal, a single member of staff is directly responsible for a group of students and a second member of staff is "on call" nearby.

Further information can be found in the parents' handbook.

- College mobile phones should not be used for personal calls. After use they must be signed back in at the college office. Any problem with the phone should be reported as soon as possible.
- By arrangement with the Principal, a member of staff's personal mobile phone may be designated as the means of communication for specific activities (ie those listed above). In such situations, it is expected that this policy will be observed in respect of personal use. The cost of calls made on college business will be reimbursed, provided that they can be identified on an itemised bill or otherwise.
- The use of mobile phones by staff whilst on college duties must respect national legislation and common courtesies. For example, they must not be used whilst driving and should be switched to silent at events and venues where this is expected.
- The college assesses the risk to students through the improper use of mobile phones to be very low. Staff and volunteers must ensure that their use of mobiles phones maintains this low level of risk.

13. USE OF REASONABLE FORCE AND PHYSICAL RESTRAINT; ACCEPTABLE PHYSICAL CONTACT

1. The Legal Framework

Physical Restraint should be limited to emergency situations and used only in the last resort. Under the Children Order 1995, it is only permissible as described under the heading "Physical Control". Article 4 of the Education Order 1998 clarifies powers that already exist in common law. It enables teachers and other members of staff in the college, authorised by the Principal, to use such force as is reasonable in the circumstances, to prevent a student from:

- Committing an offence
- Causing personal injury to, or damage to the property of, any person (including the student him or herself)
- Engaging in any behaviour prejudicial to the maintenance of good order and discipline at the college or among its students, whether during a teaching session or otherwise. (Examples of possible situations are given in Section 6) This policy draws on 'Use of reasonable force; Advice for principals, staff and governing bodies' published by the DfE in July 2013 and KCSIE.

2:1 Definition of restraint at EDGBASTON COLLEGE

Physical restraint is the positive application of force with the intention of protecting the student from harming him or herself or others or seriously damaging property.

2:2 General policy aims

Staff at Edgbaston College recognise that the use of reasonable force is only one of the last in a range of strategies available to secure student safety/well-being and also to maintain good order and discipline. Our policy on restraint should therefore be read in conjunction with our Behaviour and Safeguarding and Child Protection policies.

2:3 Specific aims of the restraint policy

- To protect every person in the college community from harm.
- To protect all students against any form of physical intervention that is unnecessary, inappropriate, excessive or harmful.
- To provide adequate information and training for staff so that they are clear as to what constitutes appropriate behaviour and to deal effectively with violent or potentially violent situations.

3. Why use restraint?

Physical restraint should avert danger by preventing or deflecting a student's action or perhaps by removing a physical object, which could be used to harm him/herself or others. It is only likely to be needed if a student appears to be unable to exercise self-control of emotions and behaviour. It is not possible to define every circumstance in which physical restraint would be necessary or appropriate and staff will have to exercise their own judgement in situations which arise within the above categories. Staff should always act within the College's policy on behaviour and discipline, particularly in dealing with disruptive behaviour.

Staff should be aware that when they are in charge of students during the college day, or during other supervised activities, they are acting in loco parentis and should, therefore, take reasonable action to ensure students' safety and well-being. Failure to physically restrain a student who is subsequently injured or injures another, could, in certain circumstances, lead to an accusation of negligence. At the same time, staff are not expected to place themselves in situations where they are likely to suffer injury as a result of their intervention.

The college does not have a "no-contact" approach to student management, since this may leave staff unable to protect students. This section on reasonable force and physical restraint should, therefore, be read in connection with the section on physical contact, below. It is the intention of these policies to allow and support staff to make appropriate physical contact.

3.1 Alternative strategies

There are some situations in which the need for physical restraint is immediate and where there are no equally effective alternatives (eg is a student is about to run across a road).

However, in many circumstances there are alternatives e.g. use of assertiveness skills such as:

- the broken record in which an instruction is repeated until the student complies
- use of a distracter, such as a loud whistle, to interrupt the behaviour (such as a fight) long enough for other methods of verbal control to be effective
- withdrawal of attention (audience) e.g. if an action such as damage to property is threatened
- other techniques designed to defuse the situation, such as the avoidance of confrontation, or use of humour (in these cases the incident can be dealt with later when emotions are no longer running high)
- the employment of other sanctions consistent with the college's policy on behaviour.

3.3 Use of physical restraint

Physical restraint should be applied as an act of care and control with the intention of re-establishing verbal control as soon as possible and, at the same time, allowing the student to regain self-control. It should never take a form which could be seen as a punishment. Staff are authorised to use reasonable force only in applying physical restraint, although there is no absolute definition of this, as what constitutes reasonable force depends upon the particular situation and the student to whom it is being applied. However, as a general rule, only the force necessary to stop or prevent the behaviour should be used, in accordance with the guidelines below.

There are some forms of physical intervention, which may involve minimal physical contact, such as blocking a student's path or the staff member physically interposing him or herself between the student and another student or object. However, in some circumstances, direct physical contact may be necessary. In all circumstances other methods should be used if appropriate or effective physical restraint should be a last resort.

KCSIE 2020 provides additional guidance that reasonable force may involve either *passive* physical contact, such as standing between students or blocking a student's path, or *active* physical contact such as leading a student by the arm out of the classroom.

When considering the use of reasonable force towards students with SEND or medical conditions, the risks should be carefully considered and reasonable adjustments made in relation to individual needs. Individual behaviour plans, personal health or medical plans and other forms of proactive behaviour support should be taken into account to reduce the need for reasonable force.

When physical restraint becomes necessary:

DO

- Tell the student what you are doing and why
- Use the minimum force necessary
- Involve another member of staff if possible
- Tell the student what s/he must do for you to remove the restraint (this may need frequent repetition)
- Use simple and clear language
- Hold limbs above a major joint if possible e.g. above the elbow
- Relax your restraint in response to the student's compliance

DON'T

- Act in temper (involve another staff member if you fear loss of control)
- Involve yourself in a prolonged verbal exchange with the student
- Attempt to reason with the student
- Involve other students in the restraint
- Touch or hold the student in sexual areas
- Twist or force limbs back against a joint
- Bend fingers or pull hair

- Hold the student in a way which will restrict blood flow or breathing e.g. around the neck
- Slap, punch, kick or trip up the student.

3.4 Actions after an incident

Physical restraint often occurs in response to highly charged emotional situations and there is a clear need for debriefing after the incident, both for the staff involved and the student. **The Principal or a member of the leadership team should be informed of any incident as soon as possible** and will take responsibility for making arrangements for debriefing once the situation has stabilised. An appropriate member of the teaching staff should always be involved in debriefing the student involved and any victims of the incident should be offered support, and their parents informed on the same day by the Principal (see below). A copy of the form in Appendix 5 must be completed by the member of staff involved and any adult witnesses on the same day as the incident and passed to the person reviewing the incident. In incidents where a member of SLT or the Principal is involved the Safeguarding Governor, Proprietor or a member of Governance must be informed.

If the behaviour is part of an ongoing pattern it may be necessary to address the situation through the development of a behavioural EHC plan, which may include an anger management programme, or other strategies agreed by the SENCO. It is also helpful to consider the circumstances precipitating the incident to explore ways in which future incidents can be avoided. All incidents should be recorded immediately. All sections of the report should be completed so that in the event of any future complaint a full record is available. The Principal (or, in his/her absence, a member of the leadership team) will contact parents as soon as possible after an incident, normally on the same day, to inform them of the actions that were taken and why, and to provide them with an opportunity to discuss it.

4 Risk Assessments

If the college becomes aware that a student is likely to behave in a disruptive way that may require the use of reasonable force, the college will plan how to respond if the situation arises. Such planning will address:

- Management of the student (e.g. reactive strategies to de-escalate a conflict, holds to be used if necessary)
- Involvement of parents to ensure that they are clear about the specific action the college might need to take
- Briefing of staff to ensure they know exactly what action they should be taking (this may identify a need for training or guidance)
- Identification of additional support that can be summoned if appropriate.

5 Complaints

A clear restraint policy, adhered to by all staff and shared with parents, should help to avoid complaints from parents. It is unlikely to prevent all complaints, however, and a dispute about the use of force by a member of staff might lead to an investigation, either under disciplinary procedures or by the Police and social services department under child protection procedures. It is the college's intention through this policy to inform all staff, students, parents and governors about these procedures and the context in which they apply.

6. When might it be appropriate to use reasonable force?

Examples of situations that may require restraint are when:

- a student attacks a member of staff, or another student
- students fighting
- a student is causing, or at risk of causing, injury or damage by accident, by rough play, or by misuse of dangerous materials, substances or objects
- a student is running in a corridor or on a stairway in a way in which he/she might have or cause an accident likely to injure her/himself or others

- a student absconding from a class or trying to leave college (NB this will only apply if a student could be at risk if not kept in the classroom or at college)
- a student persistently refuses to obey an order to leave an area
- a student behaves in such a way that seriously disrupts a lesson.

Acceptable Physical Contact

It is inappropriate to rule out all forms of physical contact between adults and students in college. In some circumstances, physical contact is important in providing comfort, reassurance and trust. It is important, therefore, that acceptable parameters for physical contact are understood and followed. Staff should be careful that their actions do not lead to misinterpretation, making themselves vulnerable to accusations of inappropriate contact. In this context, this section should be read in conjunction with Section 10 (Safe Working Practice) of this policy and also the staff handbook.

General Principles:

- Physical contact should always be a response to the needs of the student, not the adult and should last only as long as is necessary
- It should take place only with the student's clear consent
- Adults should be aware of any religious or cultural practices or beliefs which may influence whether physical contact is acceptable
- Aspects of the curriculum, such as coaching in sport, music, drama and dance, may be more effectively taught through strategies which involve physical contact. However, these should be undertaken in a public arena, such as a class situation, and not in one-to-one tuition.

Specific Considerations

- The administration of first aid or medication may necessitate contact proximate to intimate areas of the body. In such circumstances, administration should be undertaken in a manner which respects the dignity of the patient by someone who is suitably qualified. Administration should preferably be undertaken by someone of the same gender and a second adult should be present.

14. RADICALISATION AND EXTREMISM: THE 'PREVENT' STRATEGY

Radicalisation refers to the process by which a person comes to support terrorism and/or extremist ideologies associated with terrorist groups. Extremism is the vocal or active opposition to fundamental values and includes calling for the death of members of the armed forces. Terrorism is defined by the government as an action that:

- endangers or causes serious violence to a person/people;
- causes serious damage to property; or
- seriously interferes or disrupts an electronic system.

The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

The college is committed to supporting the 'Prevent' strategy in relation to radicalisation and extremism. It works to prevent students being drawn into supporting extremist ideas and terrorist ideology and to help them develop resilience to radicalisation. The proprietor has appointed Dr Eman Butt as the governance committee's 'Prevent lead person' and the DSL is the nominated member of staff to be the 'Prevent lead person' in college.

There is no single way of identifying whether a student is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a student's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet). However, it is

possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in students' behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying students who might be at risk of radicalisation and act proportionately, which may include the DSL or deputy making a referral to the Channel programme

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Further information on the Prevent duty can be found via the link in Appendix 2.

The college undertakes the following measures in relation to the 'Prevent Strategy':

- 'Prevent' is considered carefully as part of the college's safeguarding procedures
- All staff and volunteers undertake training in respect of 'Prevent'
- The DSL undertakes a higher level of 'Prevent' training in order to support staff, engage effectively with external agencies and follow reporting and information sharing protocols appropriately
- 'Prevent' is considered carefully in the appointment of new staff, volunteers and contractors and in the admitting of visitors and visiting speakers to the college
- 'Prevent' is a topic for governance, staff and SLT meetings
- There is a clear referral route through the DSL to the 'Channel' programme
- The college strongly promotes Fundamental British Values in curricular and extra-curricular activities and the promotion of the college's ethos and aims.
- The college will work as required with other agencies, including the LADO, BSCP, Children's Services and 'Channel' with regard to the 'Prevent' agenda
- Computer systems have appropriate levels of filtering to ensure, insofar as is possible, that terrorist and extremist material is suitably controlled
- The college provides internet safety training for students, parents and staff; students are strongly supported to enable them to use the internet safely
- PSHE lessons, assemblies and other areas of the curriculum and extra-curricular programme include topics to help develop students' resilience to radicalisation.

15. VETTING VISITING SPEAKERS

The college is aware of the potential risk to students through exposure to views of visiting speakers whose presentations may include material of an extremist nature or which contradicts the college's commitment to provide students with a balance of opposing political views. Accordingly, the college undertakes a range of measures to vet the content of presentations by visiting speakers. The level of checking will be determined by an assessment of the likely level of risk and may include the following measures;

- The visiting speaker will be asked to provide assurance that the content of the presentation does not include material of a radicalising or extremist nature and is not in any other way inappropriate for the students involved.
- Presentations, such as Powerpoint, will be required in advance and will be checked by the member of staff responsible and discussed with the speaker

- Visiting speakers will always be accompanied. A member of staff will attend presentations to students and will be prepared to intervene, should the content stray from agreed expectations
- An appropriate level of checks, including an identity check, will be undertaken on visiting speakers, particularly any not previously known to the college. Most speakers will be well known to the college (parents, local professionals, religious leaders) and the college will be familiar with their standing and reputation. Where a speaker represents an organisation, for example, the fire service or a charity, identity checks will include verification of the speaker's connection with the organisation.
- The college's vetting procedures may include an internet search to check for links with inappropriate organisations or the expression of extremist views which would indicate that it would be inappropriate to address students at the college.

The above procedures apply at an appropriate level, to all situations where visitors present to the students, not simply formal talks, but also the more informal visits to class. The procedures are also followed where speakers visit at the invitation of students. Any such student invitation must be approved by a member of the SLT.

16. REVIEWING THIS POLICY

When reviewing this policy the college will draw on the expertise of staff in shaping the safeguarding arrangements and policies, to ensure that the college considers at all times what is in the best interests of the student.

EDGBASTON COLLEGE
Child Protection (Safeguarding) Policy: Appendices

Appendix 1 Helpful Information

This section is designed to provide information that facilitates understanding of key terminology and indicators:

WHAT IS CHILD ABUSE? Defined in the Government guidance KCSIE 2020

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children.

There are four types of child abuse.

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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.

Bullying is not defined as a form of abuse in Working Together but there is clear evidence that it is abusive and will include at least one, if not two, three or all four, of the defined categories of abuse.

The following provides useful guidance on specific further categories of abuse;

Child Sexual Exploitation

In February 2017 the DfE published updated guidance on Child Sexual Exploitation, in the form of an update to Working Together (2018). The updated guidance includes the following definition:

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

Students may receive something in exchange for performing sexual activities. This can include food, accommodation, drugs, alcohol, cigarettes, affection, gifts, or money. Students rarely report child sexual exploitation, so it is important that staff are aware of the potential indicators. These include;

- Acquisition of money, clothes, mobile phones etc without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from college, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being

Staff have been made aware of the updated guidance and recognise that no school or college, community or social group is immune to the risk of child sexual exploitation, including online, and it can affect both boys and girls. Students can be perpetrators as well as victims.

Appendix 2 provides links to relevant documentation relating to child sexual exploitation.

Child Criminal Exploitation (CCE)

KCSIE 2020 provided a separation between CCE and CSE, though there is a fine line between the two. The college guides staff to be aware of what to look out for and what to do in conversations with students and in observations of their behaviour in groups and in the local community, particularly the most challenging and most vulnerable students.

CCE is defined as typically being where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Typical indicators of CCE are:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late;
- children who regularly miss school or education or do not take part in education.

Serious Violence and County Lines

The college ensures that all staff are aware of indicators which may signal that students are at risk from, or are involved in, serious violent crime. These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts of new possessions could also indicate that students have been approached by, or are involved with, individuals associated with criminal networks or gangs.

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

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

- can affect any child or young person, male or female, under the age of 18
- can affect any vulnerable adult over the age of 18
- can still be exploitation even if the activity appears consensual
- can involve force and/or enticement methods of compliance and is often accompanied by violence or threats of violence

- can be perpetrated by individuals or groups, males or females, and young people or adults
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

The college ensures that staff are aware of the associated risks of serious violence and county lines and understand the measures in place to manage these. Links to advice for colleges on preventing youth violence and gang involvement and on county lines are to be found in Appendix 2.

Domestic abuse

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

- psychological
- physical
- sexual
- financial and
- emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on students. In some cases, a student may blame him or herself for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships.

Links to documents providing advice on identifying students who are affected by domestic abuse and how they can be helped are available in Appendix 2.

FGM (Female Genital Mutilation)

FGM is a crime committed usually within the scope of honour-based abuse. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies. The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is new-born, during childhood or adolescence, just before marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and, therefore, girls within that age bracket are at a higher risk. FGM is illegal in the UK. It is mandatory for teachers to personally report known cases of FGM to the police. Please refer to section 5, above for information on this mandatory duty and to Appendix 2 for relevant contact information.

For cases where it is believed that a girl may be vulnerable to FGM or there is a concern that she may be about to be genitally mutilated, the staff will inform the DSL who will report it as with any other child protection concern.

Honour-Based Abuse (HBA)

Honour-based abuse is a violent crime or incident which may have been committed to protect or defend the honour of the family or community, including FGM, forced marriage, and practices such as breast ironing. It is often linked to family or community members who believe

someone has brought shame to their family or community by doing something that is not in keeping with their unwritten rule of conduct. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a student being at risk of HBA, or already having suffered HBA.

Honour based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture
- convert to a different faith from the family

Women and girls are the most common victims of honour-based abuse. However, it can also affect men and boys. Crimes of ‘honour’ do not always include violence. Crimes committed in the name of ‘honour’ might include:

- domestic abuse
- threats of violence
- sexual or psychological abuse
- forced marriage
- being held against your will or taken somewhere you don’t want to go
- assault

If staff have a concern regarding a student that might be at risk of HBA or who has suffered from HBA, they should speak to the DSL or deputy. As appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and **children’s social care**. However, if it is clear that a crime has been committed or the student is at immediate risk, the police will be contacted in the first place. It is important, if honour-based abuse is known or suspected, that communities and family members are NOT spoken to prior to referral to the police or social care as this could increase risk to the student.

Policy regarding Students Missing From Education

The college views absence as an issue related to both safeguarding and educational outcomes. Measures have been taken to adopt the additional admissions and attendance requirements which came into force on 5th September 2016 with a view to minimising the occurrence of students being missing from education. Relevant staff have received training in the implications and implementation of these measures. The college liaises with and reports to the Local Authority, as required, on these matters and may take steps that could result in legal action for attendance, or a referral to children’s social care, or both. In accordance with the requirements of KCSIE 2020, the college holds, so far as is reasonably possible, more than one emergency contact number for each student.

Patterns of students missing education, particularly repeatedly, can be a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a student going missing in future. Staff should be aware of the college’s unauthorised absence and students missing from education procedures. It is essential that they are assiduous in their prompt completion of attendance registers, liaise closely with the college office to resolve any unexplained

absences, and report any concerns about absence to the DSL. A relatively short length of time a student is missing does not reduce risk of harm to that student, and all absence or non-attendance is considered with other known factors or concerns. On a day-to-day basis administrative staff monitor registers for patterns of absence and the DSL/a member of SLT undertakes a regular review of attendance records to analyse for patterns and trends.

The DSLs and staff consider the following, as appropriate:

Students missing lessons:

- Are there patterns in the lessons that are being missed?
- Is this more than avoidance of a subject or a teacher?
- Does the student remain on the college site?
- Is the student being sexually exploited during this time?
- Is the student late because of a caring responsibility?
- Has he or she been directly or indirectly affected by substance misuse?
- Are other students routinely missing the same lessons, and does this raise other risks or concerns?
- Is the lesson being missed one that would cause bruising or injuries to become visible?

Students missing single days:

- Is there a pattern in the day missed?
- Is it before or after the weekend suggesting the student is away from the area?
- Are there specific lessons or members of staff on these days?
- Is the parent informing the college of the absence on the day?
- Are missing days reported back to parents to confirm their awareness?
- Is the student being sexually exploited during this day?
- Do the parents appear to be aware?
- Are the student's peers making comments or suggestions as to the whereabouts of the student?

Students with continuous days of absence:

- Has the college been able to make contact with the parent?
- Is medical evidence being provided?
- Are siblings attending college (either our college or local schools/colleges)?
- Do we have any concerns about radicalisation, FGM, forced marriage, honour based violence, sexual exploitation?
- Have we had any concerns about physical or sexual abuse?

Forced Marriage

In the case of children: 'a forced marriage is a marriage in which one or both spouses cannot consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.' In developing countries 11% of girls are married before the age of 15. One in 3 victims of forced marriage in the UK are under 18. It is important that all members of staff recognise the presenting symptoms, how to respond if there are concerns and where to turn for advice. Advice and help can be obtained nationally through the Forced Marriage Unit and locally through the local police safeguarding team or children's social care. The college's policies and practices reflect the fact that, while all members of staff have important responsibilities with regard to students who may be at risk of forced marriage, they should not undertake roles in this regard that are most appropriately discharged by other children's services professionals, such as police officers or social workers.

Characteristics that may indicate forced marriage:

While individual cases of forced marriage, and attempted forced marriage, are often very particular, they are likely to share a number of common and important characteristics, including:

- an extended absence from college, including truancy;
- a dip in performance or sudden signs of low motivation;

- excessive parental restriction and control of movements;
- a history of siblings leaving education to marry early;
- poor performance, parental control of income and students being allowed only limited career choices;
- evidence of self-harm, treatment for depression, attempted suicide, social isolation, eating disorders or substance abuse; and/or
- evidence of family disputes/conflict, domestic violence/abuse or running away from home.

On their own, these characteristics may not indicate forced marriage. However, it is important to be satisfied that, where these behaviours occur, they are not linked to forced marriage. It is also important to avoid making assumptions about an individual student's circumstances or act on the basis of stereotyping. For example, an extended holiday may be taken for entirely legitimate reasons and may not necessarily represent a pretext for forced marriage.

Definition of harm & significant harm - adoption & children act 2002 (section 10)

"Ill treatment or the impairment of health or development (impairment suffered from seeing or hearing the ill treatment of another)."

'*Development*' means physical, intellectual, emotional, social or behavioural development.

'*Health*' means physical or mental health.

'*Ill treatment*' includes sexual abuse and forms of ill treatment which are not physical.

NB: The Adoption & Children Act 2002 s120 amended the definition of harm to include those instances where a student may witness domestic violence.

Recognition of significant harm.

Significant harm includes an allegation of a sexual nature or parents whose behaviour may present risk because of:

- Domestic violence, drug and alcohol abuse and mental health problems
- Any physical injury caused by assault or neglect which requires medical attention
- Repeated incidents of physical harm
- Any contact with a person assessed as presenting a risk to students
- Students who live in low emotional warmth, high criticism environments
- Students who suffer from persistent neglect
- Students who may be involved in prostitution
- Other circumstances where professional judgement and/or evidence suggest a student's health, development or welfare may be significantly harmed.

Indicators of abuse

Physical:

- Unexplained injuries, burns, bruises
- Finger marks
- Fear of undressing or medical help
- Improbable explanations for injuries
- Fear of returning home or parents being contacted
- Unexplained absence from college.

Neglect:

- Constant hunger
- Poor personal hygiene
- Inappropriate clothing
- Frequent lateness and non attendance
- Poor social relationships
- Constant tiredness
- Independent and street wise
- No parental support for education
- Compulsive stealing or scrounging.

- A student going missing from an education setting is a potential indicator of abuse and neglect.

Emotional Abuse:

- Fear of new situations
- Inappropriate emotional responses
- Self harm
- Reluctance to accept praise
- Low self esteem
- Lack of home support
- Depressed and withdrawn
- Social isolation – not joining in, and few friends.

Sexual Abuse:

- Bruises
- Scratches
- Bite marks on the body
- Persistent infections in the anal or genital area
- Any sexual awareness inappropriate to student's age – shown in drawings, play, vocabulary
- Frequent masturbation
- Changes in behaviour
- Refusal to stay with certain people
- Self-harm
- Depression
- Low self-esteem
- Pregnancy.

Recognition of abuse

Be open to possibilities. Be aware – if you don't believe it is possible you will never see it. Don't jump to conclusions and look for credible non-abusive explanations, but recognise you may need to seek advice to evaluate the facts. Don't let your preconceptions of the family skew your judgement.

The symptoms of stress and distress

An abused student will usually show signs of stress and distress. Possible signs of abuse include, but are not limited to, those listed below. Many of these may, of course, have nothing to do with abuse, but are worth consideration in trying to understand the student's behaviour:

- A drop in college performance
- Aggressive or hostile behaviour
- Difficulties in relationships with peers
- Excessively affectionate or sexual behaviour towards adults or other students
- Regression to more immature forms of behaviour
- Self-harming or suicidal behaviour
- No reasonable or consistent explanation for a student's injuries, or a pattern of injuries
- Disturbed sleep

In addition to the information provided in Section 14 on Radicalisation and Extremism and in this section on Abuse, staff can refer to Annex A of KCSIE for information on further specific areas of concern about vulnerability, including,

- Children and the court system
- Children with family members in prison
- Child criminal exploitation
- Domestic abuse
- Homelessness

Staff should ensure that they are familiar with the information provided within Annex A of KCSIE 2020 and, if they have any concerns, report them to the DSL.

Appendix 2 – Useful links and contact details

College Contacts:

Designated Safeguarding Lead:

Jeffrey Guille

Jeff@edgbastoncollege.co.uk

0121 306 0182

Deputy Designated Safeguarding Lead:

Umar Ahmed

Umar@edgbastoncollege.co.uk

0121 306 0182

Safeguarding Governor:

Dr Eman Butt

Eman@edgbastoncollege.co.uk

0121 306 0182

Children's Social Care (CSS) (for students in need and students at risk of harm):

Normal Hours: 0121 303 1888

Emergency Hours: 0121 675 4806

CASS@birminghamchildrenstrust.co.uk

Birmingham Safeguarding Children's Partnership (BSCP) (for allegations against staff or volunteers):

PO Box 17340

Birmingham

B2 2DR

0121 464 2612

Independent Colleges Inspectorate

Email: info@isi.net

Telephone: 020 7600 0100

Fax: 020 7776 8849

Address: CAP House, 9-12 Long Lane, London, EC1A 9HA

Disclosure and Barring Service

<https://www.gov.uk/government/organisations/disclosure-and-barring-service>

Email: dbsdispatch@dbs.gsi.gov.uk

Address: DBS, PO Box 181, Darlington, DL1 9FA

Telephone: 01325 953795

'Keeping Children Safe in Education' (September 2020) (KCSIE)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811513/DRAFT_Keeping_children_safe_in_education_2020.pdf

Part 1 only is available separately here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811515/DRAFT_Keeping_children_safe_in_education_Part_one_2020.pdf

Working together to safeguard children July 2018

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf

Version of this guidance suitable for young people

<https://www.childrenscommissioner.gov.uk/publication/working-together-to-safeguard-children/>

Version of this guidance suitable for younger children

<https://www.childrenscommissioner.gov.uk/publication/guide-to-keeping-children-safe/>

What to do if you're worried a child is being abused (March 2015)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

Contact details for advice and support about extremism

LA Prevent lead, in Prevent priority areas Colvin White, colvin.white@Birmingham.gov.uk
, 0121 303 9905 / 07920 088 512

Local police force, 101 (the non-emergency police number)
DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors : 020 7340 7264 and counter-extremism@education.gsi.gov.uk.

Revised Prevent strategy for England and Wales:

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

Contact details for mandatory reporting of FGM to the police:

Contact Number: 101 (Non-Emergency number) and 999 (Emergency number)

DfE Guidance on Information Sharing

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Further information on contextual safeguarding

<https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>

NSPCC Inform website

<http://www.nspcc.org.uk/Inform>

Telephone: 0808 800 5000

Email: help@nspcc.org.uk

NSPCC Whistleblowing helpline

<https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

Telephone: 0800 028 0285

Email: help@nspcc.org.uk

NSPCC guidance on when to call the police

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

Guidance for safer working practice for adults who work with children and young people

<http://webarchive.nationalarchives.gov.uk/20100202180143/http://www.dcsf.gov.uk/everychildmatters/resources-and-practice/IG00311/>

Office of the Children's Commissioner for England (OCC)

<https://www.childrenscommissioner.gov.uk/>

Email: advice.team@childrenscommissioner.gsi.gov.uk
or info.request@childrenscommissioner.gsi.gov.uk

Child Sexual Exploitation

[Child sexual exploitation: definition and guide for practitioners;
www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners](http://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners)

[Child sexual exploitation: annexes;
www.gov.uk/government/uploads/system/uploads/attachment_data/file/591905/CSE_Guidance_Annexes_13.02.2017.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591905/CSE_Guidance_Annexes_13.02.2017.pdf)

Peer on Peer Abuse

DfE Guidance:

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-colleges-and-colleges>

Advice from the UK Council for internet safety:

Sexting: How to respond to an incident:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/647389/Overview_of_Sexting_Guidance.pdf

Sexting in colleges and colleges:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Colleges_FINAL_Update_Jan17.pdf

NSPCC Guidance on Harmful Sexual Behaviour:

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/harmful-sexual-behaviour/>

Home Office guidance on preventing youth violence and gang involvement

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf

Home Office guidance on Criminal Exploitation of children and vulnerable adults: County Lines

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf

Documents providing help in identifying and helping students who are affected by domestic abuse:

NSPCC- UK domestic-abuse Signs Symptoms Effects

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/domestic-abuse/>

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

<http://www.refuge.org.uk/get-help-now/support-for-women/what-about-my-children/>

Safelives: young people and domestic abuse.

<http://www.safelives.org.uk/knowledge-hub/spotlights/spotlight-3-young-people-and-domestic-abuse>

Guidance on Mental Health

Preventing and Tackling Bullying (July 2017):

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf

Mental Health and Behaviour in Schools (November 2018):

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental health and behaviour in schools.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools.pdf)

Appendix 3 - Sample Letters to Parents and Students Regarding Internet Use

Sample Letter to Parents

Dear Parents

Responsible Internet Use

As part of your child's curriculum and the development of ICT skills, Edgbaston College provides supervised access to the Internet. We believe that the use of the World Wide Web and e-mail is worthwhile and is an essential skill for students as they grow up in the modern world. Please would you read the attached e-safety policy, which forms part of our safeguarding policy and talk about it with your child. Then sign and return the consent form so that your child may use the Internet at college. Although there have been nationwide concerns about students having access to undesirable materials, we take positive steps to deal with this risk in college. Our college Internet provider operates a filtering system that restricts access to inappropriate materials. Whilst every endeavour is made to ensure that suitable restrictions are placed on the ability of students to access inappropriate materials, the college cannot be held responsible for the nature or content of materials accessed through the Internet. The college will not be liable for any damages arising from your child's use of the Internet facilities.

Our Rules also concern the types of communications that students make using computers and other technology. We would like your support in helping to ensure that the students at Edgbaston College are using technology in a responsible and polite manner and never in a way that could upset another person or spoil their work.

Should you wish to discuss any aspect of Internet use please telephone the Principal to arrange an appointment.

Yours sincerely

Principal's Secretary

Parent's Consent for Internet Access

I have read and understood the college rules for responsible Internet use and give permission for my son/daughter to access the Internet. I understand that the college will take all reasonable precautions to ensure students cannot access inappropriate materials. I understand that the college cannot be held responsible for the nature or content of materials accessed through the Internet. I agree that the college is not liable for any damages arising from use of the Internet facilities.

Signed:

Date:

Please print name:

Sample Student Agreement Form

EDGBASTON COLLEGE Responsible Computer Use

Please complete, sign and return to the college

Student:

Class:

Student's Agreement

I have read and understand the college online safety policy. I will use the computer system and Internet in a responsible way and obey these rules at all times.

Signed:

Date:

Appendix 4 – Sample Photographic Consent Forms

TBC – No photograph taken currently

Appendix 5

RECORD OF RESTRAINT

Date of incident:

Time of incident:

Student Name:

D.o.B:

Member(s) of staff involved:

Adult witnesses to restraint:

Student witnesses to restraint:

Outline of event leading to restraint:

Outline of incident of restraint (including restraint method used):

Outcome of incident:

Description of any injury sustained and any subsequent treatment:

Date /time parent/carer informed of incident:

By whom informed:

Outline of parent/carer response:

Signatures of staff completing report:

.....
.....
.....

Brief description of any subsequent inquiry/complaint or action:

Appendix 6 – Safeguarding Impact of Covid-19 (the college should amend and extend this section as relevant.)

Proprietors and staff at Edgbaston College are keenly aware that the Covid-19 pandemic has the potential to make a significant impact on the well-being of staff and students at the college and, consequently on the safeguarding of the students. The college has created a Covid-19 Risk Assessment, which reflects government and local guidance, with particular reference to the [DfE guidance](#) for the full opening of schools. Measures are in place to ensure that the college monitors this guidance and adapts its practice accordingly when the guidance changes, in order to remain up to date.

The college's practice and procedures reflect the impact of Covid-19, in particular, with reference to the following circumstances:

- The college aims to maintain students' education wherever possible, by adapting its approaches, for example, with a greater focus on remote learning and online teaching. Staff and students will use only school email accounts, not personal accounts, to engage in online teaching and learning.
- The college is aware of the health risks posed by Covid-19 and has adopted appropriate practices, as stipulated by the DfE and NHS. Measures are in place to monitor the college's practices in relation to the pandemic, to ensure that they remain effective.
- The college ensures that circumstances caused by the pandemic do not result in staff or students not having access to a DSL. When a DSL is not available in person, a nominated DSL or DDSL will be available remotely and contact details will be published.
- Staff are aware that the circumstances of the pandemic have resulted in an increase in mental health issues amongst pupils and students nationwide; college staff are vigilant for any indicators of mental health issues which may come to light through engagement with the students both in remote learning and when they are able to attend the college. Staff ensure that they make time available to any student who may wish to discuss mental health issues.
- Staff are also aware that increased time spent at home in difficult circumstances may result in students being additionally vulnerable to safeguarding risks. Staff ensure that they remain vigilant for any particular indicators of safeguarding issues and ensure that they make time for any student who may wish to discuss a situation with them.
- Staff and students who are involved in online learning and working from home have been advised about appropriate conduct, locations and dress code when they are engaging online. Where students are obliged to self-isolate, the college gives consideration to amendments which can be made to sustain their learning, so far as is possible.
- The college is aware that staff recruitment during the pandemic may be more challenging, but that vetting requirements have not been relaxed. The college will adhere to DfE and DBS additional guidelines when recruiting staff and undertaking recruitment checks during this period.
- The college is taking steps to identify where students' learning may have been negatively impacted by the pandemic and judges what alterations can be made to the curriculum and to assessment in order to promote recovery in these circumstances.
- The college will endeavour to sustain the currency of staff training and recognises that, in areas such as safeguarding and first aid training, if a member of staff's qualification has expired and the pandemic has prevented access to courses to renew the qualification, a short extension of the validity of the original training is permissible.
- The college is keeping its health and safety procedures and practices and its risk assessments under review, so that any necessary amendments can be made as the pandemic evolves.

For further details, refer to the college's Covid-19 risk assessment.