A.1 Safeguarding and Child Protection Policy

Bishopstrow College fully recognises its responsibilities for safeguarding and child protection.

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1. Key Contacts

Key Contact list for Safeguarding in Bishopstrow College

Key Safeguarding Personnel			
Role	**Name**	**Tel.**	**Email**
Headteacher	Mario Di Clemente	07518 202564	principal@bishopstrow.com
Designated Safeguarding Lead (DSL)	Mario Di Clemente	07518 202564	principal@bishopstrow.com
Deputy DSL(s) (DDSL)	Chris Lewis Greg Jackson Kathy Dilworth Karen Westlake Andre Parker	201 211 207 210 210	chrisl@bishopstrow.com gregoryj@bishopstrow.com kathyd@bishopstrow.com karenw@bishopstrow.com andrewp@bishopstrow.com
Nominated Proprietor/Governor	Charlie Freer	07957 808538	charlief@bishopstrow.com
Chair of Governors	**NA**	**NA**	**NA**
Designated Teacher for Looked After Children	Chris Lewis (when required)	201	chrisl@bishopstrow.com

Mental Health Lead	Mario Di Clemente Karen Westlake	07518 202564 210	principal@bishopstrow.com karenw@bishopstrow.com
The key safeguarding responsibilities within each of the roles above are set out in Keeping Children Safe in Education (2023)			

Children's Social Care referrals:	
Multi-Agency Safeguarding Hub (MASH):	0300 456 0108
Out of hours:	0300 456 0100

If you believe a child is **at immediate risk** of significant harm or injury, you **must** call the police on 999.

2. Purpose

This Safeguarding and Child Protection Policy provides clear direction to staff and others to promote every Child's welfare. It also outlines expected behaviour when dealing with child protection issues. It makes explicit the College's commitment to the development of good practice and sound procedures, so that child protection concerns, referrals and monitoring are handled sensitively, professionally and in ways which support the needs of the child.

The College will operate safeguarding procedures in line with the locally agreed multi-agency safeguarding arrangements put in place by our safeguarding partners and follows the local criteria and protocols as outlined at https://rightchoice.wiltshire.gov.uk/Page/9227

3. Introduction

3.1 Bishopstrow College takes seriously its responsibility to protect and safeguard the welfare of children and young people in its care. During the Safeguarding Induction, the College will train all new staff in the content and application of this Safeguarding Policy.

3.2 Under Section 175 of the Education Act 2002 the Proprietors recognise their responsibility to have policies and procedures in place that safeguard and promote the welfare of children who are students of the school. Under *Working Together to Safeguard Children* 2018 and Part 2 of *Keeping Children Safe in Education* (2023) (links to these and other documents are in Appendix 9), the Proprietors also recognise the need to remedy without delay any deficiencies or weaknesses in regards to child protection arrangements that are brought to the attention of the school management or governing body. The College also follows RSHE 2020 and Prevent 2021 in drawing up this policy.

3.3 Section 11 of the *Children's Act* 2004 (Appendix 9) sets out the arrangements the College must make to promote the welfare and safeguarding of children and young people. "All schools and further education institutions have a statutory duty to safeguard and promote the welfare of children. Consequently, staff in these establishments play an important part in safeguarding children from abuse and neglect by early identification of children who may be vulnerable or at risk of harm and by educating children, about managing risks and improving their resilience through the curriculum. All schools and further education institutions should create and maintain a safe environment for children and young people, and should be able to manage situations where there are child welfare concerns". "Safeguarding is everyone's responsibility and should be a child centred approach". (*Working Together*, 2018).

3.4 There are five main elements to this Safeguarding and Child Protection policy:

a) Ensuring we practise Safer Recruitment processes in line with national legislation, by using at least one suitably trained recruiter on all interview panels, and ensuring the completion of all necessary checks.

b) Establishing a whole College safeguarding culture in which children can learn and develop.

c) Ensuring staff are trained and supported to respond appropriately and sensitively to child protection concerns, raising the awareness of child protection issues and equipping children with the skills needed to keep them safe.

d) Developing and then implementing procedures for:

- Identifying and reporting cases, or suspected cases, of abuse
- Offering support to students who may be at risk of, or vulnerable to, violent and non-violent extremist or terrorist narratives
- Offering support to students who may be at risk of criminal/sexual exploitation
- Recognising and offering support to students who are victims of sexual harassment and/or sexual violence
- Offering support to children who have social workers
- Offering support to children to improve their mental health.

e) Supporting students who may have been abused, including child-on-child abuse.

3.5 This policy applies to all students, staff, Proprietors, volunteers, contractors and visitors to Bishopstrow College.

3.6 The College recognises where it is responsible for making contacts and referrals rather than making enquiries and investigating.

4. Terminology

4.1 **Child protection** refers to the processes undertaken to meet statutory obligations laid out in the Children Act 1989 and associated guidance (see *Working Together to Safeguard Children, A guide to inter-agency working to safeguard and promote the welfare of children*, 2018) in respect of those children who have been identified as suffering, or being at risk of suffering harm.

4.2 **Safeguarding** and promoting the welfare of children is defined 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; and taking action to enable all children to have the best outcomes *Keeping Children Safe in Education* (2023).

Working Together to Safeguard Children, 2018 states that 'safeguarding children and protecting them from harm' is everyone's responsibility. Everyone who comes into contact with children and families has a role to play.

4.3 **Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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.

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

4.5 **Children** includes everyone under the age of 18. We use the term "student to refer to anyone on the college roll, irrespective of their age.

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

4.7 **Extremism** refers to the Government's 'Prevent Strategy' which defines extremism as: "vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include calls for the death of members of our armed forces in our definition of extremism".

4.8 **Prevent** is part of the UK's Counter Terrorism Strategy, preventing people from becoming involved in terrorism or supporting terrorism. 'Prevent duty guidance for England and Wales: guidance for specified authorities in England and Wales on the duty of schools, colleges and other providers in the *Counter-Terrorism and Security Act* 2015 to have due regard to the need to prevent people from being drawn into terrorism', HM Government, 2015. The Prevent strategy identifies that young people are more likely to be vulnerable to violent extremist or terrorist narratives. Schools and colleges have a duty of care to their students and staff which includes safeguarding them from the risk of being drawn into terrorism.

4.9 **Radicalisation** refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Radicalisation is the process where someone has their vulnerabilities or susceptibilities exploited towards crime or terrorism – most often by a third party, who have their own agenda, who have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Prevent programme.

4.9 **'Sexting'** is the exchange of self-generated sexually explicit images, through mobile picture messages or webcams over the internet. Young people may also call it Cybersex or sending nudes.

4.10 **Child-on-child abuse** occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age; everyone directly involved in child-on-child abuse is under the age of 18.

4.11 **Contextual Safeguarding** is an approach to understanding and responding to young people's experiences of significant harm beyond their families.

It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Therefore children's social care practitioners need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices.

Contextual Safeguarding therefore expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

5. College policy

5.1 We recognise that for our students, high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult help to prevent abuse and extremism. Safeguarding is **everyone's** responsibility; therefore **everyone** who comes into contact with children, their families and carers has a role to play in safeguarding children. School and college staff are particularly important as they are in a position to identify concerns early and provide help for children. Schools, colleges and their staff form part of the wider safeguarding system for children. For services to be effective they should be based on a clear

understanding of the needs and views of children. (*Working Together to Safeguard Children*, 2018.) In order to fulfil their safeguarding responsibilities, professionals should make sure that their approach is child-centred and promotes the child's welfare and they should consider what is in the **best interests** of the child. Everyone who comes into contact with children has a role to play in identifying concerns, sharing information and taking prompt action.

5.2 The College will therefore:

a) Ensure we have a Designated Safeguarding Lead (DSL) from the senior management team and at least one Deputy Designated Safeguarding Lead (DDSL), and a Nominated Safeguarding Proprietor who have been trained to the appropriate level and understand their responsibilities with respect to the protection of children, young people and vulnerable adults and the safeguarding of all learners. For designated members of staff this training should take place every **two years**. The Designated Safeguarding Lead and their deputies are most likely to have a complete safeguarding picture and will be the most appropriate individuals to advise on Safeguarding concerns. All staff and other adults working within the College setting are clear about the procedures where they are concerned about the safety of a child. A full description of the duties of a DSL can be found in Annex C of *Keeping Children Safe in Education* (2023) and in Appendix 7 of this document.

b) Ensure that there are safeguarding policies and procedures in place and they are reviewed regularly to ensure students are kept safe.

c) Ensure that all staff have read and understood at least Part One, or the condensed version in Annex A, of *Keeping Children Safe in Education* (2023). The Proprietors have responsibility for ensuring that staff understand their responsibilities and will decide which guidance is appropriate for staff roles, recording the rationale for their decisions.

d) Ensure that leaders and those who work directly with children read Annex B and that staff with a Safeguarding responsibility read Annex C of *Keeping Children Safe in Education* (2023)

e) Ensure that students know that there are adults within the College they can approach if they are worried or are in difficulty.

f) Establish and maintain an environment where students feel safe and secure and are encouraged to talk and are listened to. Staff respond within clear boundaries about what is safe and acceptable, and they seek to understand the triggers for children's behaviour. Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned and are aware of the importance of professional curiosity.

g) Ensure all College staff are able to identify children who may benefit from early help and the early help process and their role in it. This includes identifying emerging problems, liaising with the Designated Safeguarding Lead, sharing information with other professionals to support early identification and assessment and in some cases acting as the lead professional in undertaking an Early Help assessment.

h) Ensure the College meets all the requirements of the paragraphs in part 2 (spiritual, moral, social and cultural development of students), part 3 (welfare, health and safety of students), part 4 (suitability of staff, supply staff and proprietors) and part 5 (premises and accommodation at schools) of The *Education (Independent School Standards) Regulations* 2014.

i) Ensure positive behaviour is promoted consistently and that staff use effective de-escalation techniques. Reasonable force, including restraint, is only used in strict accordance with the legislative framework to protect the child and those around them, and in line with the College physical intervention policy.

j) Be aware of the signs of abuse and neglect to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All staff must be aware of the main categories of abuse: Physical, Emotional, Sexual and Neglect, and wider safeguarding issues, including but not limited to child on child sexual violence and harassment, child on child abuse and exploitation, 'all' risks outside of the home and within the local area including online. In addition, all staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. Staff should be aware that behaviour linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger. All staff should be aware safeguarding issues can manifest themselves via child-on-child abuse. All staff then have a responsibility to take appropriate action, working with other services as needed.

k) Ensure that any risks associated with children offending, misusing drugs or alcohol, self-harming, Female Genital Mutilation (FGM), Child Criminal and Sexual Exploitation (CSE), going missing, or being vulnerable to radicalisation are known by the adults who care for them and shared with the local authority children's social care service, MASH or other relevant agencies. That there are plans and help in place that are reducing the risk of harm or actual harm and there is evidence that the impact of these risks is being minimised. These risks are kept under regular review and there is regular and effective liaison with other agencies where appropriate. (Refer to Appendix 3 for further information on specific safeguarding issues and Annex B of *Keeping Children Safe in Education* (2023).

l) Ensure all staff members are aware of the systems which support safeguarding; these will be explained to them as part of their induction. Induction includes an introduction to the Designated Safeguarding Lead and their deputies, and staff are made aware of the behaviour policy and the College's safeguarding response to children who go missing. Staff understand the risks posed by adults or learners who use technology, including the internet, to bully, groom, radicalise or abuse children. They have well-developed strategies in place to keep children safe and to support them to develop their own understanding of these risks and in learning how to keep themselves and others safe.

m) Oversee the safe use of technology in College, and when engaged in digital learning using online platforms, when children are in their care. Staff will take action immediately if they are

concerned about bullying or children's well-being. Staff understand and adhere to the DfE guidance in regards to filtering and monitoring of technology in schools.

n) Follow Local Authority guidelines for sharing child protection and/or safeguarding concerns with the relevant local authority, MASH and/or the police. If a child is in immediate danger or is at risk of harm a referral should be made to MASH and/or the police immediately. Staff will need to decide what action to take. Where possible, there should be a conversation with the Designated Safeguarding Lead to agree a course of action, although any staff member can make a referral to MASH. Where the concern is about suspected harm or risk of harm to a child, the referral should be made to the local authority for the area where the child lives. Where the concern is an allegation about a member of staff in a setting, or another type of safeguarding issue affecting children and young people in a setting, the matter should be referred to the local authority in which the setting is located. The relevant Designated Officer needs to be informed. Where referrals are not made by the Designated Safeguarding Lead, they should be informed, as soon as possible, that a referral has been made.

o) Ensure all concerns, discussions and decisions made and the reason for those decisions are recorded in writing. If in doubt about the recording requirements staff should discuss with the Designated Safeguarding Lead. Written records of Safeguarding/child protection concerns are made in a timely way and records are shared appropriately. Please refer to *Information Sharing advice for practitioners* for full guidance on information sharing.

p) Ensure a record of referral is retained and there is evidence that any agreed action following the referral has been taken promptly to protect the child from further harm. Ensure there is evidence, where applicable, that staff have an understanding of when to make referrals when there are issues concerning sexual exploitation, radicalisation and/or extremism, Female Genital Mutilation (FGM), or that they have sought additional advice and support. Parents are made aware of concerns and their consent sought in accordance with local procedures, unless doing so would increase the risk of or actual harm to a child. If in doubt, contact MASH for consultation and advice.

q) Ensure there is a written plan in place that has clear and agreed procedures to protect a child. For children who are the subject of a child in need plan, child protection plan or who are in the care of the local authority, the plan will identify the help that the child should receive and the actions to be taken. The Proprietors will, when the situation arises, ensure that staff have the skills and knowledge necessary to keep children in the care of the local authority safe.

r) Ensure children who go missing from the setting they attend receive well-coordinated responses that reduce the harm or risk of harm to them. Ensure risks are well understood and their impact is minimised, and that staff are aware of, and implement in full, local procedures for children who are missing from home and/or from education. Local procedures for notifying the local authority and parents are available, understood and followed. Comprehensive records are held and shared between the relevant agencies to help and protect children.

s) Include in the curriculum activities and opportunities for Personal, Health, Social and Economic Education (PHSEE), which equip students with the skills they need to stay safe from all forms of

abuse such as bullying (including cyber bullying), sexting, and child-on-child abuse, homophobic behaviour, racism, sexism and extremism. Fundamental British values are promoted. Any discriminatory behaviours are challenged and help and support are given to children about how to treat others with respect.

t) Include in the curriculum (age appropriate) material which will help students develop realistic attitudes to the responsibilities of adult life.

u) Ensure that wherever possible, every effort will be made to establish effective working relationships with parents/carers and colleagues from partner agencies.

v) Ensure that safeguarding the child is of paramount importance when considering a request for flexi schooling and that any concerns are raised with the MASH team.

w) Ensure that the College contributes to inter-agency working in line with statutory guidance (*Working Together to Safeguard Children*, 2018). Schools and colleges should work with social care, MASH, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to interagency plans to provide additional support to children subject to child protection plans. All schools and colleges should allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or consider whether to conduct, a section 17 assessment or a section 47 enquiry (*Children's Act* 1989). As part of meeting a child's needs the Proprietors recognise the importance of information sharing between professionals and local agencies. Data protection fears should not be a barrier to information sharing as the safety of the child is paramount. Although inter-agency working and information sharing are vital in identifying and tackling all forms of abuse, it is clear they are especially important to identify and prevent child sexual exploitation.

x) Ensure appropriate action is taken when children stop attending the College; this includes informing the local authority when a student is going to be deleted from the register outside standard transition points.

y) Ensure the College practises safer recruitment by robustly checking the suitability of staff, contractors and volunteers to work with children to ensure that those who are unsuitable to work with children are not employed. There is monitoring to prevent unsuitable people from being recruited and having the opportunity to harm children or place them at risk.

z) Ensure all staff and carers have a copy of and understand the written procedures for managing allegations of harm to a child. Staff recognise that children are capable of abusing their peers and the Proprietors ensure that allegations of child-on-child abuse are investigated and dealt with. They know how to make a complaint and understand policies on whistleblowing and how to manage other concerns about the practice of adults in respect of the safety and protection of children. The Proprietors ensure that there is a procedure in place to handle allegations against teachers, head teachers, principals, supply staff, volunteers and other staff. Such allegations will be referred to the Designated Officer for Allegations (DOFA) at the local

authority by the appropriate person (set out in Part 4 of *Keeping Children Safe in Education* (2023).

aa) Ensure 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. *Keeping Children Safe in Education* (2023).

bb) Guidance about child-on-child abuse

All staff are aware that children can abuse other children and that it can happen both inside and outside of school or College and online. It is also acknowledged that although boys are more likely to be perpetrators and girls the victims, all child-on-child abuse is unacceptable and will be taken seriously. Children who are LGBTQ+ may be targeted by other children.

It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

Signs and indicators of child-on-child abuse

- absence from school or disengagement from school activities
- physical injuries
- mental or emotional health issues
- becoming withdrawn – lack of self esteem
- lack of sleep
- alcohol or substance misuse
- changes in behaviour
- inappropriate behaviour for age
- harm to others

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

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

Child-on-child abuse is most likely to include, but may not be limited to:

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

- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Dealing with non-consensual nude and semi-nude imagery

If a student makes a disclosure of online harassment and has images of a sexual nature, staff should not view, download or forward the images; this is illegal. If the images have been viewed by accident, then this should be reported to the DSL or deputy.

You should not ask the child to delete the images. Where possible, the incident should be managed with two members of staff present, preferably one of which should be the DSL (or deputy). All incidents of this nature should be reported to the DSL.

It is important for staff, and especially the safeguarding lead, to be able to distinguish between what feels to be 'consensual' or non-consensual sexual activity between young people. For example, considering whether sending nudes to a girlfriend of the same age is consensual, or whether it is exploitative or coerced.

All staff are clear as to the College's policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

For further information about sexual violence and sexual harassment see *Keeping Children Safe in Education* (2023) Annex B.

Supporting children involved in sexual abuse

When a report has been made there will be careful consideration of what actions need to be put into place to reduce the risk of the children encountering each other, although this might not be necessary in all cases.

If it is a report of rape or sexual assault, then any meeting could be very distressing, and any action considered will need to meet the needs of both/all the students involved.

The following points will be considered:

- Should the children or young people be in the same classes?
- Do they share transport to school or college?
- What could happen if they bump into each other in a corridor?
- Are they likely to meet at the start or end of the day?
- Will peers 'take sides'?

Affected students may find that going into some classes is more difficult than others. For example, a young person that is involved in a sexual assault may feel uncomfortable in some PSHEE/RSE or biology lessons. It may be that friendship groups in one class are more prominent than in another. Any risks will be recorded, monitored and actioned to help support all those involved. This will be reviewed on a regular basis and changed if necessary. The DSL will record specifically the time and location of the incident, and any action required to make the location safer.

6. Statutory Framework

6.1 This policy is in line with guidance from the following legislation and statutory guidance;

a) The *Children Act* 1989 & Section 11 of the *Children's Act* 2004
b) The *Education Act* 2002 (Section 175)
c) The *Education (Student Information) (England) Regulations* 2005
d) *Dealing with Allegation of Abuse Against Teachers and Other Staff* (2011)
e) *Working Together to Safeguard Children* (2018)
f) *Keeping Children Safe in Education* (Sept 2023)
g) *Inspecting safeguarding in early years, education and skills settings,* 2016, Ofsted
h) Wiltshire Child Protection Procedures https://www.proceduresonline.com/swcpp/
i) *What To Do If You're Worried a Child Is Being Abused* (March 2015)
j) Prevent Within Schools, a toolkit for schools (May 2015)
k) *The Education Inspection Framework*
l) *Education (Independent Schools Standards) Regulations* 2014.

7. Roles and responsibility

7.1 All adults working with, or on behalf of, children have a responsibility to protect them. There are, however, key people within schools and the Local Authority who have specific responsibilities under child protection procedures. The names of those carrying out these responsibilities for the current year are listed in section 1 of this document.

7.2 It is the role of the Designated Safeguarding Lead to ensure that all of the child protection procedures are followed within the College, and to make appropriate, timely contact with MASH and the Prevent Officer at Wiltshire Police, in cases of suspected extremism and radicalisation under the Prevent Strategy, in accordance with College procedures. If the child resides out of the Wiltshire area, it is the responsibility of the Designated Safeguarding Lead to make contact with the appropriate child protection team for that authority and follow their procedures on how to make a referral. If, for any reason, the Designated Safeguarding Lead is unavailable, a trained Deputy Designated Safeguarding Lead will act in their absence (see section 1). Additionally, it is the role of the Designated Safeguarding Lead to ensure all staff employed, including temporary staff and volunteers within the College, are aware of the College's internal child protection procedures; to advise staff and to offer support to those requiring this.

7.3 The DSL and the Principal undertake an annual review with the Proprietors detailing any changes to the policy and procedures; the training undertaken by all staff and propietors and other relevant issues. The College will then complete the Annual Audit of Safeguarding in Schools to keep the Wiltshire Safeguarding Vulnerable People Partnership updated on how they are managing their statutory responsibilities to safeguarding (section 175 *Education Act* 2002, section 157 *Education Act* 2002 and section 11 *Children's Act* 2004). The findings of the audit will be reported to Wiltshire Safeguarding Vulnerable People Partnership.

7.4 Specific training is provided for the College's Designated Safeguarding Lead and Deputies.

7.5 The Designated Safeguarding Lead will be responsible for addressing any barriers to effective inter-agency working and will report to the Principal when it has an effect on safeguarding children.

8. The responsibility of proprietors and management

8.1 Part 2 of *Keeping Children Safe in Education* 2023 sets out the responsibilities of Governing Boards, Proprietors and management committees. Governing Boards, proprietors and management committees must ensure that they comply with their duties under legislation. They must have regard to this guidance to ensure that the policies, procedures and training in their schools or colleges are effective and comply with the law at all times, ensuring there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.

8.2 The Proprietors ensure a member of the Senior Management Team is Designated as the Safeguarding Lead (DSL) and that there are arrangements for a Deputy Designated Safeguarding Lead (DDSL). They ensure that there is a job description for the Designated Safeguarding Lead that states all the duties and responsibilities undertaken by the DSL, and that they have appropriate training for the role.

The Proprietors ensure that all staff have the skills, knowledge and understanding necessary to Safeguard Children in the care of the Local Authority.

8.3 The Proprietors are responsible for nominating a proprietor to take the lead in overseeing Safeguarding and Child Protection, known as the Nominated Proprietor. The Proprietors ensure there are effective and appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare. These include:

- an effective Child Protection & Safeguarding policy approved by the Proprietors on an **annual** basis (and as and when other updates occur)
- a Staff Code of Conduct which, amongst other things, includes – whistleblowing, acceptable use of technologies, staff/student relationships, low-level concerns policy and communications, including the use of social media
- recruitment procedures that help deter, identify or reject people who might abuse children. The Proprietors will act reasonably in making decisions about the suitability of the prospective employee based on checks and evidence including: criminal record checks (DBS checks), barred list checks and prohibition checks together with references and interview information.
- Online safety and filtering an monitoring meet the standards set out by the DfE, and that the College's filtering and monitoring is reviewed annually as a minimum.

8.4 Section 10.1 outlines the polices that are provided to all staff on induction. The Proprietors should take a proportional risk-based approach to the level of information that is provided to temporary staff and volunteers.

8.5 This policy is in accordance with government guidance and refer to locally agreed inter-agency procedures, **updated annually** (as a minimum), and is available publicly via the College website or by other means.

8.6 The Principal ensures that the above policies and procedures, particularly concerning referrals of cases of suspected abuse and neglect, adopted by the proprietors are understood, and followed by all staff and should be easily understood by staff, children and parents.

8.7 The Proprietors will put in place appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future. The Government Missing children and adult strategy and the department's *Children Missing Education: Statutory Guidance for local authorities* guidance provides information that governing boards and Proprietors might find useful when considering children who go missing from education.

8.8 The Proprietors ensure that the College has in place statutory policies and procedures for Safeguarding, Safer Recruitment, Allegations Management and Whistleblowing. The Nominated Proprietor for safeguarding and whistleblowing has oversight of how the policy and procedure are followed.

8.9 Procedures to minimise the risk of child-on-child abuse at Bishopstrow College include the very high staffing ratios, the PSHEE curricular provision which includes these issues explicitly,

the limited times when students are not directly supervised by staff, the care taken with online education and the supervision of online and mobile technologies.

Systems for students to report abuse include all the standard pastoral structures of tutors, teachers, boarding house staff, Principal, together with the accessibility and training of all staff in the College. In addition, the College has recognised the specific challenges of child-on-child issues and has instituted an "Everyone's Invited" weekly meeting that encourages students to discuss such welfare matters in a recognised safe space.

Initial concerns are recorded in the Engage Communication Log, unless they are immediately evident as being safeguarding issues that are dealt with under safeguarding recording reporting. Allegations will be investigated sensitively, recognising that child-on-child abuse needs to be investigated and dealt with in the same way as other forms of abuse, according to best safeguarding practice recommended by the local SVPP.

8.9.1 The Nominated Proprietor maintains proper oversight of safeguarding in the following ways:

The Nominated Proprietor meets with the Designated Safeguarding Lead regularly (at least three times a year) to understand:

a. How policies connected with Safeguarding and Safer Recruitment are being implemented
b. How Safer Recruitment is being practised and recorded
c. The challenges and issues that the College staff are managing to ensure that children are kept safe at all times
d. Filtering and monitoring

The Nominated Proprietor takes part in the completion of the annual section 175 Safeguarding Audit.

The Nominated Proprietor participates directly in some training and operates a drop-in check at other areas of training.

Training of proprietors and management

- Training undertaken by staff and proprietors is in line with advice from the Wiltshire Safeguarding Children Partnership. Safer Recruitment and all required training is compliant and meets the required standards
- The expectation from the Local Authority and the Safeguarding Partnership is that the minimum requirement is for all staff and Proprietors to receive Universal Safeguarding Training and annual Safeguarding updates. Therefore, as well as the College's safeguarding induction programme, all proprietors attend whole college safeguarding and child protection training and any subsequent refresher training session and annual updates.
- The Nominated Proprietor undertakes relevant induction and refresher safeguarding and child protection training throughout their time as a Proprietor.
- At least one Proprietor is Safer Recruitment trained.

Single Central Record

- Ensure that all Proprietors have completed DBS checks and section 128 checks which are recorded on the Single Central Record.
- The Single Central Record details of staff and other volunteers is current, complete and compliant.

Meetings

- Safeguarding and Child Protection is always an agenda item at all staff meetings
- The Annual section 175 Safeguarding Audit has been completed and that returns are submitted to the LA in a timely manner, and is reported upon at a relevant meeting of the Proprietors.

8.9.2 The Proprietors ensure a designated teacher for children looked after by the local authority is appointed to promote the educational achievement of children who are looked after and ensure that this person has appropriate training. The most common reason for children to become looked after is as a result of neglect and/or abuse. Proprietors ensure that all staff have the skills, knowledge and understanding necessary to keep looked after children safe.

9. Procedures

9.1 Staff are kept informed about child protection and Prevent responsibilities and procedures through induction, briefings and ongoing awareness training. There may be other adults in the College who rarely work unsupervised, more usually working alongside members of the College staff e.g. contractors. The Principal will ensure they are aware of the College's policy and the identity of the Designated Safeguarding Lead. See Appendix 1 'What to do if you are worried a child is being abused or neglected.'

9.2 During term time, the DSL and/or a DDSL is always available during school hours for staff to discuss any safeguarding concerns. The D/DSL provides feedback to staff who share concerns.

9.3 Any member of staff, volunteer or visitor to the College who receives a disclosure of abuse, an allegation or suspects that abuse, extremism, radicalisation or female genital mutilation (FGM) may have occurred **must** report it immediately to the Designated Safeguarding Lead (see section 1) or in their absence, the Deputy Designated Safeguarding Lead (see section 1). Appendix 2 contains an example Welfare Concerns form. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff. There is a mandatory reporting requirement for health, teaching, and social care professionals to report cases of FGM to the police.

9.4 The Designated Safeguarding Lead or their Deputy will immediately refer cases of suspected or actual abuse or allegations to MASH for or the appropriate local authority where the child lives. In cases where a student may be vulnerable to or exhibiting, extremist views the Designated Safeguarding Lead or their Deputy will follow the Prevent referral Pathway in Appendix 5.

9.5 The Designated Safeguarding Lead and their Deputy will follow the most up to date contact and referral procedures for MASH.

9.6 To decide whether a referral to MASH is appropriate, the Designated Safeguarding Lead (or Deputy) will telephone MASH for advice.

9.7 Where there is a child protection concern, allegation or disclosure, a phone call will **immediately** be made to MASH (or Emergency Duty Team if outside of office hours) to alert them to the situation. Delay in referring cases immediately may place the child at further risk and may prevent MASH from putting in place timely, protective measures for the child or young person. In the event of a Prevent concern or allegation, a phone call will also be made to the Prevent Officer at Wiltshire Police.

9.8 If it is decided that the contact does not meet the thresholds for MASH, advice will be provided as to whether there is a role for early response services.

9.9 In cases where the child resides outside of Wiltshire, the Designated Safeguarding Lead will make themselves familiar with referral processes for the child protection team in the child's home authority.

9.10 The College will always undertake to share our intention to refer a child to MASH with the parents or carers unless to do so could place the child at greater risk of harm or impede a criminal investigation. On these occasions the College will take advice from MASH and/or the Police.

9.11 The D/DSL consistently monitors all children with concerns, whether a referral to MASH/IFD has been made or not.

9.12 A statement in the College prospectus and on the College website informs parents and carers about our College's duties and responsibilities under child protection procedures. This policy is freely available to parents and carers on the College website and in hardcopy, on request.

9.13 The College will notify the Local Authority when parents notify them that they will be electively home educating their children.

10. Training and support

10.1 The Principal and all other staff who work with children will undertake appropriate child protection awareness training to equip them to carry out their responsibilities for child protection effectively.

The Proprietors ensure that at Induction, all staff members undergo safeguarding and child protection training, and online safety training.

Safeguarding induction covers:

- Safeguarding and Child Protection policy (including policy and procedures for dealing with child-on-child abuse) *
- Online safety, including the College online safety policy
- the role and identity of the DSL and deputies *
- KCSIE part one or Annex A, as appropriate *
- KCSIE Annex B for College leaders and those who work directly with children
- Student behaviour policy (include anti-bullying measures that also apply to cyberbullying, prejudice-based bullying and discriminatory bullying)
- Safeguarding response to children who go missing from education (see later section in this policy)
- Staff code of conduct * (includes whistleblowing, acceptable use of IT, staff/student relationships, low-level concerns policy, communications and the use of social media).

(* copies given)

10.2 The Designated Safeguarding Lead will ensure that all staff complete Universal Safeguarding Training face to face and that this is refreshed in line with guidance from Wiltshire SVPP or statutory guidance. Universal safeguarding training for all staff is regularly updated, usually every 3 years as a minimum. Any member of staff not present at the whole college session will undertake this statutory training requirement on their return.

In addition, all staff members receive regular safeguarding and child protection updates (e.g. via email, e-bulletins, staff meetings), as required but at least annually, to provide them with relevant skills and knowledge for safeguarding children effectively. This also includes Prevent training, to ensure that staff have the necessary training that gives them the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism.

Staff training records will be kept up to date to monitor this. Initial Universal Safeguarding Training will be completed by attending a Universal Safeguarding Training session delivered either by the Local Authority or College Designated Safeguarding Lead (if appropriate training has been completed).

10.3 The College will publicise the name of the Designated Safeguarding Lead and the College's procedures in reporting concerns.

10.4 The Designated Safeguarding Lead and any nominated Deputies will complete local authority Designated Safeguarding Lead Training and this will be refreshed every **two years**. This will be recorded on staff training records and monitored by the Designated Safeguarding Lead.

10.5 The Nominated Proprietor will have oversight of all child protection training records to ensure that training is taking place in a timely manner.

10.6 Where there are concerns and queries about child protection, support will be available for all College staff from the Designated Safeguarding Lead, and their Deputies. The Designated Safeguarding Lead will seek support from the Principal, Wiltshire Police Prevent Officer and appropriate Local Authority staff where needed.

11. Professional confidentiality

11.1 Confidentiality is an issue which needs to be discussed and fully understood by all those working with children, particularly in the context of child protection. It forms part of the Universal Safeguarding Training mentioned in section 10. The only purpose of confidentiality in this respect is to benefit the child. A member of staff must never guarantee confidentiality to a student nor should they agree with a student to keep a secret. Where there is a child protection concern, this must be reported to the Designated Safeguarding Lead and may require further investigation by the appropriate authorities. Children can be reassured that only the people who "need to know" will be informed, that this will be the minimum necessary and that information will not become common knowledge.

11.2 Staff will be informed of relevant information in respect of individual cases regarding child protection on a 'need to know basis' only. Where information is shared with appropriate staff, they must maintain the confidentiality outlined in 11.1**.**

12. Records, Monitoring and Information Sharing

12.1 Well-kept records are essential to good child protection practice. The College is clear about the need to record any concerns held about a child or children within the College, the status of such records and when these records should be passed over to other agencies.

12.2 Any member of staff receiving a disclosure of abuse, or noticing signs or indicators of abuse, must make an accurate record as soon as possible, noting what was said or seen, putting the event in context, giving the date, time and location. All records will be dated, signed and will include the action taken. (See Appendix 2.) Making the record should not delay referring the disclosure to the Designated Safeguarding Lead or appropriate authority.

12.3 These notes are kept in a confidential file, which is separate to other files, and stored in a secure place. In the same way, notes are kept of any student who is being monitored for child protection reasons.

12.4 If a student transfers to the College, we will liaise with partner organisations (such as the setting/school/ organisation previously attended by the child) to ensure any safeguarding records are shared on transition and within 5 days for an in year transfer or within 5 days of the start of the new term.

12.5 If a student transfers from the College, these files, where appropriate, will be securely forwarded to the student's new school marked 'confidential' and for the attention of the receiving school's Designated Safeguarding Lead.

12.6 Schools must ensure they are GDPR compliant when handling student's data.

12.7 The D/DSL acts in accordance with *Information Sharing* and in line with Wiltshire Council Record Keeping Guidance which includes details about file retention.

13. Attendance at child protection and safeguarding meetings

13.1 It is the responsibility of the Designated Safeguarding Lead to ensure that the College is represented and a report is submitted to any Child Protection Conference, Team Around the Child or My Family Plan meeting, called for children on their school roll or previously known to them. If the Designated Safeguarding Lead is unable to attend, it is their responsibility to identify someone else to attend in their place. Whoever attends should be fully briefed on any issues or concerns.

13.2 The College will be part of core groups for children subject to child protection plans. Core Groups meet regularly to review and update Child Protection Plans, and the Designated Safeguarding Lead will ensure that the College is represented at these meetings and that records of the meetings are kept. When a child is made subject to a Child Protection Plan, it is the Designated Safeguarding Lead's responsibility to ensure that the child is monitored regarding their College attendance, welfare, presentation and achievement. The Lead Professional will be informed if there is an unexplained absence of two or more days of a student who is subject to a Child Protection Plan.

13.3 The College will engage with MASH, Child Protection Conferences, Core Group Meetings and My Family Plan meetings as appropriate. If the Designated Safeguarding Lead is unable to represent the school, the Deputy Designated Safeguarding Lead or in the absence of either of the above, the most senior member of staff will be asked to represent the school.

14. Students at risk

14.1 The College recognises the importance of identifying vulnerable students that may be at risk of abuse (Categories of Abuse – see Appendix 3), or children that may have additional support needs. We recognise that a student may be classed as vulnerable for a variety of reasons and this may not be permanent.

14.2 This College recognises the following as vulnerable groups (although not exclusively):

- Children with Special Educational Needs
- Children with emotional/behavioural/attachment disorders
- Children known to the YOT team
- Children attending alternative education provision (AP).
- Children with caring responsibilities or classified as a young carer
- Looked after children and those subject to private fostering arrangements
- Children missing education/low attendance
- Children dealing with issues around domestic abuse

- Children from Gypsy, Roma, Traveller communities
- Children experiencing bereavement
- Children in receipt of FSM or PPG
- Children at risk from neglect; physical; sexual and emotional abuse
- Disabled children
- Children at risk of exclusion
- Children at risk from bullying, including online bullying and prejudice-based bullying
- Children at risk of child-on-child abuse
- Children at risk from the impact of new technologies on sexual behaviour, for example sexting
- Girls at risk of female genital mutilation
- Children at risk of being drawn into terrorism and radicalisation
- Children at risk of exploitation, sexual exploitation and trafficking
- Children at risk of honour-based violence or forced marriage
- Children affected by substance misuse (drugs, alcohol)
- Children affected by mental health issues
- Children affected by faith abuse
- Children affected by gender-based violence or violence against women and girls
- Children affected by fabricated or induced illness
- Children affected by issues around bullying
- Children affected by crime
- Children affected by gang activity
- Children affected by gender reassignment lesbian, gay, bisexual and transgender (LGBTQ+) abuse.
- Children from BAME communities.

14.3 We will recognise vulnerable students and support them through:

a) the curriculum to encourage self-esteem and self-motivation
b) the College ethos which promotes a positive, supportive and secure environment and which gives all students and adults a sense of being respected and valued
c) the implementation of the College's behaviour management policies
d) a consistent approach agreed by all staff which will endeavour to ensure the student knows that some behaviour is unacceptable but s/he is valued
e) regular liaison with other professionals and agencies that supports the students and their families
f) a commitment to develop productive, supportive relationships with parents, whenever it is in the child's best interest to do so
g) the development and support of a responsive and knowledgeable staff group, trained to respond appropriately in child protection situations
h) recognition that, statistically, children with behavioural difficulties and disabilities are most vulnerable to abuse, so staff who work with such children will need to be particularly sensitive to signs of abuse
i) recognition that in a home environment where there is domestic abuse, drug or alcohol abuse, children may also be vulnerable and in need of support and/or protection.

14.4 The College will support students from families at risk of domestic abuse by signing up to Operation Encompass with Wiltshire Police, to be informed of domestic incidents within the child's home.

14.5 The College recognises it may be the only stable, secure and predictable element in the lives of vulnerable children and that whilst at College their behaviour may still be challenging and defiant or they may be withdrawn.

14.6 Recognising the vulnerability of part time students, the College will inform the local authority if they put students on a part-time timetable including where they have agreed flexi schooling.

14.7 Child-on-child abuse.
The College recognises that children may abuse other children, even if there are no reports. All staff are clear on policy and procedure with regard to child-on-child abuse. This may include but would not be limited to:

- Bullying (including cyber bullying)
- Physical abuse such as hitting, shaking, kicking, biting, hair pulling, or otherwise causing physical harm.
- Sexual violence such as rape, assault by penetration, sexual assault.
- Sexual harassment such as sexual comments, remarks, jokes, online sexual harassment, which may be stand alone or part of a wider pattern of abuse. (Part Five of *Keeping Children Safe in Education* 2023)
- Consensual and non-consensual sharing of nudes and semi-nude images or videos.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or engage with sexual activity with a third party.
- Upskirting, which involves taking a picture under a person's clothes without their consent with the intention of viewing their genitals or buttocks to gain sexual gratification or to cause the victim humiliation, distress or alarm.
- Initiation or hazing type violence and rituals.

14.8 Serious Violence - all staff should be aware of indicators which may signal that children are at risk from, or are involved in serious crime and understand the measures in place to manage these. Additional information is available in Appendix 5.

14.9 This policy should be considered alongside other related policies in the College. These are the policy for PSHEE (Manual Section E.1 Curriculum Policy), the policy for the management of students' behaviour (Manual Section D.4 Behaviour Policy), including our policy on physical intervention (Manual Section D.7) and our policy on anti-bullying (Manual Section D.6) and our health and safety policy (Manual Section A.4).

14.10 The Department for Education (DfE) has announced a helpline to support potential victims of sexual harassment and abuse in education settings. The Dedicated NSPCC helpline number is 0800 136 663 The Helpline will also provide support to parents and professionals. Run by

the NSPCC, the helpline provides children and adults who are victims of sexual abuse in schools with support and advice including how to contact the police and report crimes.

15. Online Safety *(See Manual Section D.8 Online Safety Policy)*

15.1 The College believes that the use of information and communication technologies brings great benefits. We recognise that there are online safety issues that need to be planned for that will help to ensure appropriate, effective and safer use of electronic communications. All members of staff are trained in/receive regular updates in online safety and recognising and reporting concerns (including at induction).

15.2 Children and young people may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some young people may find themselves involved in activities which are inappropriate or possibly illegal. The College therefore recognises its responsibility to educate students, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies. The Bishopstrow College policy on unsupervised access to the internet and the use of mobile phones (3G, 4G, 5G) is much more restrictive than most schools and this provides a great measure of protection.

15.3 The College ensures that parents and carers are made aware of what their children are being asked to do online, including the sites that they will be asked to access and be clear who from the College (if anyone) their child is going to be interacting with online.

15.4 The College has a separate Online Safety Policy should be considered in line with this policy. The Proprietors ensure appropriate filters and appropriate monitoring systems are in place, but are careful that 'over blocking' does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding. (Additional information to support governing bodies and Proprietors is provided in Annex D, KCSIE, 2023).

15.5 Photographs, video and electronic images of students and staff are classed as personal data under the GDPR.

15.6 The College adheres to the DFE Filtering and Monitoring standards, and the Cyber Security Standards set out in KCSiE (2023). Our online safety mechanisms are reviewed annually.

16. Safer recruitment *(See Manual Section A.10 Safer Recruitment Policy)*

16.1 *Keeping Children Safe in Education* (2023) (Part three), sets out clear guidance which is adhered to. The safer recruitment policy contains detailed information about recruitment and selection procedures for staff and volunteers.

16.2 The recruitment process is robust in seeking to establish the commitment of candidates to support the College's measures to safeguard and promote the welfare of children and to identify, deter or reject people who might pose a risk of harm to children or are otherwise unsuited to work with them.

16.3 The level of DBS certificate required, and whether a prohibition check is required, will depend on the role and duties an applicant is employed/volunteers to do in a school or college.

16.4 For most, an enhanced DBS certificate, which includes barred list information, will be required as the majority of staff will be engaging in regulated activity. Please refer to Part three, *Keeping Children Safe in Education* (2023) or further details relating to regulated activity.

16.5 Assurances are sought for contractors who are required on site, including identification checks on arrival. Appropriate vetting checks are carried out by the school for self-employed individuals.

Further detail is provided in the College Safer Recruitment Policy.

17. Professional boundaries for staff and code of conduct *(See Manual Section A.5 Staff Code of Conduct)*

17.1 All staff must behave responsibly and professionally in all dealings with children, including online, and specifically with students for whom they have a duty of care. All staff must follow the procedures set out in the Staff Code of Conduct. Staff should always avoid behaviour which might be misunderstood or misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children are in positions of trust in relation to the children in their care. A relationship between a member of staff and a student cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable children and young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

17.2 Each new member of staff and volunteer will be provided with a full Safeguarding induction, in addition to the training requirements set out in section 10. A copy of '*Guidance for Safer Working Practice for Adults who work with Children and Young People*' (2022) will be available for all staff and volunteers to read. All staff are required to read Part One of *Keeping Children Safe in Education*, Sept 2023, if working directly with children, or Appendix A if assessed as appropriate.

17.3 Use of social networking sites by staff is considered in the Staff Code of Conduct. The general principle is that college staff are in a position of trust, and there are expectations that they will act in a professional manner at all times.

17.4 The use of all electronic provisions, including online storage, set up by the college are monitored. All access rights are terminated upon the cessation of relevant employment contract.

18. Whistleblowing *(See Manual Section A.3 Whistleblowing Policy)*

18.1 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

18.2 Systems are in place and well promoted so that children can confidently report concerns or abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

18.3 All staff are aware of their duty to raise concerns about the attitude or actions of colleagues, and are regularly reminded of this. Staff are aware how to raise concerns and who to share these with. This is detailed in our Whistle Blowing Policy which should be viewed alongside this policy.

18.4 Whistleblowing concerns about the Principal should be raised with the Proprietors.

18.5 Where a staff member feels unable to raise an issue with their employer or feel their genuine concerns are not being addressed, other whistleblowing channels may be open to them. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally.

Staff can call: 0800 028 0285 from 8:00 AM to 8:00 PM, Monday to Friday

Email: help@nspcc.org.uk.

19. Radicalisation and Extremism

19.1 The College values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Students and teachers have the right to speak freely and voice their opinions. However, free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

19.2 The College seeks to protect children and young people against the messages of all violent extremism and is expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.

19.3 Staff will be made aware at safeguarding training of the characteristics within children and families that may indicate radicalisation or warning indicators of those who may be vulnerable to radicalisation.

19.4 Staff will treat any radicalisation/extremism concerns in the same manner as safeguarding concerns and will follow the College's safeguarding and child protection procedures as outlined in 7.2. (Further information on the 'Prevent Duty' and schools' responsibilities, including the Referral Pathway can be found in Appendix 5).

20. Allegations

20.1 It is essential that the high standards of concern and professional responsibility adopted with regard to alleged child abuse by parents are similarly displayed when members of staff are accused of abuse.

20.2 The Proprietors ensure there are procedures in place to handle allegations against teachers, the Principal, volunteers and other staff.

20.3 The procedure to be followed in the event of an allegation being made against a member of staff is to follow guidance in Part Four of KCSIE, September 2023. Concerns should be addressed to the Principal, unless they are about the Principal, in which case concerns are addressed to the Nominated Proprietor.

20.4 The Principal, Designated Safeguarding Lead or another Senior Manager should, in the first instance, contact MASH in order to liaise with the Local Authority Designated Officer (DOFA). Through discussion and consultation, a decision will be made whether to hold an Allegation against Staff/Volunteer Meeting (ASV). Where the allegation is against the Principal, the Nominated Proprietor will take this action.

20.5 If, for any reason, it is decided that an Allegations against Staff/Volunteer Meeting is not appropriate, it may be necessary to address matters in accordance with the College's disciplinary procedures in liaison with the IFE HR Coordinator.

20.6 Staff and volunteers, as part of their induction, are provided with a guide for staff faced with an allegation of abuse.

20.7 The Proprietors ensure that there are procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in a regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. **This is a legal duty and failure to refer when the criteria are met is a criminal offence.**

20.8 The Proprietors ensure that there are procedures in place to handle allegations against other children.

21. Low Level Concern Policy

21.1 Introduction

The safety and wellbeing of students in the College is dependent on the vigilance of all our staff and their prompt communication to the Principal of any concerns, no matter how small, about any conduct by an adult which causes doubt about that adult's suitability to work with or have access to children (including online). All references in this section to "adult" should be interpreted as meaning any adult working in the College who provides education for children under 18 years, including supply teachers, volunteers and contractors.

The notification and prompt and appropriate handling of all concerns about adults is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

This policy, if correctly implemented, should encourage an open and transparent culture; enable the College to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the College are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of our college.

21.2 Our Low-Level Concern Policy

The overarching aim of the College's Low-Level Concern Policy is to facilitate a culture in which the values and expected behaviours which are set out in the staff Code of Conduct are lived, constantly monitored, and reinforced by all staff. In particular, the intention of this policy is to:

- maintain a culture of openness, trust and transparency in which staff are confident and clear about behaviours expected of them and their colleagues, the delineation of boundaries and reporting lines;

- ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Staff Code of Conduct; and Safeguarding and Child Protection Policy; and

- provide for responsive, sensitive and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

21.3 What is a Low-Level Concern?

A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that an adult may have acted in a manner inconsistent with the college's Code of Conduct or simply – even if not linked to a particular act or omission – a

sense of unease as to the adult's behaviour particularly towards or around children. Low-level concerns include where an adult may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the DOFA (see section 21)

21.4 *Low-Level Concerns about self (self-reporting)*

From time to time an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection s/he considers falls below the standard set out in the Staff Code of Conduct.

Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the College sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

21.5 *Low-Level Concerns about another adult*

From time to time an individual may notice behaviour or actions in other adults which leave them concerned. These are behaviour or actions which fall short of a formal allegation of abuse. These tend to be behaviours which indicate that our Staff Code of Conduct has not been met. Any such concerns can be dealt with as a low-level concern.

21.6 <u>What should I do if I have a low-level concern?</u>

Where a low-level concern exists it should be reported to the Principal as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident). This should be reported on the low-level concerns form (Appendix 10).

21.7 <u>How will my low-level concern be handled?</u>

The Principal will, in the first instance, satisfy him/herself that it is a low-level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure (see section 20). The circumstances in which a low-level concern might be reclassified as an allegation are where:

a) the threshold is met for an allegation;

b) there is a pattern of low-level concerns which collectively amount to an allegation; or

c) there is other information which when taken into account leads to an allegation

Where the Principal is in any doubt whatsoever, advice will be sought from the DOFA.

Having established that the concern is low-level, the DSL or Principal as appropriate will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc.

21.8 What records will be kept?

Where a low-level concern has been communicated, a confidential record will be kept in a central record which logs all low-level concerns (see Appendix 10).

This is necessary to enable any patterns of concerning behaviour to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

a) the concern (or group of concerns) has been reclassified as an allegation as above; or

b) the concern (or group of concerns) is sufficiently serious to result in formal action under the College's grievance, capability or disciplinary procedure.

With any low level concern the College will review whether polices need to be revised or whether additional training is required to minimise risk of recurrence of the issue of concern.

22. The College as a Boarding school

22.1 Boarding schools have additional factors to consider with regards to safeguarding. For example, we are particularly alert to inappropriate student relationships and the potential for child-on-child abuse, especially in terms where there is a significant gender imbalance in a section of the College. Further details can be found at section five of KCSIE 2023.

23. Designated Teacher for children who are looked after

When we have such children, the Proprietors will appoint a designated teacher to promote the educational achievement of children who are looked after and ensure that this person has appropriate training specific to the role.

24. Children who are looked after by the Local Authority

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

24.2 In particular, they ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the

carer by the authority looking after him/her. The Designated Safeguarding Lead should have details of the child's social worker and the name of the Virtual School Head in the authority that looks after the child.

25. Children with special education needs and disabilities

Children with Special Educational Needs and Disabilities (SEND) can face additional safeguarding challenges. The Proprietors ensure that safeguarding induction identifies the fact that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with special educational needs and disabilities can be disproportionally impacted by things like bullying without outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers.

26. Children missing education

26.1 Staff report immediately to the D/DSL, if they know of any child who may be "Missing Education" – that is:

- Absent from education persistently, or for prolonged periods and/or on repeat occasions
- Missing – whereabouts unknown or
- of compulsory school age (5-16) with no school place and not electively home educated

26.2 The designated teacher for LAC and care leavers discusses any unauthorised/unexplained absence of Looked After Children with Virtual School when required.

26.3 The DSL shares any unauthorised/unexplained absence of children who have an allocated social worker within 24 hours.

26.4 Children who do not attend school regularly can be at increased risk of abuse and neglect. Where there is unauthorised/unexplained absence, and after reasonable attempts have been made to contact the family without success, the DSL follows the SVPP procedure and consults/refers to the MASH team as appropriate. Where there are no known welfare concerns about a student, the college follows procedures for unauthorised absence and where appropriate, reports concerns to the Education Welfare Service.

27. Inspections

27.1 Bishopstrow College is inspected by the Independent Schools Inspectorate (ISI).

27.2 Inspectors will be looking for evidence of a culture of safeguarding that supports effective arrangements to identify learners who may be at risk; which responds in a timely way; and that staff recruitment is managed and any allegations are dealt with appropriately.

27.3 The Principal will respond in a timely way to investigations by the Local Authority following a Safeguarding referral to Ofsted/ISI.

28. Site Safety

28.1 Risk Assessments are undertaken and maintained in accordance with the College's health and safety policy.

Appendix 1

What to do if you are worried a child is being abused or neglected

for staff, volunteers and visitors in all agencies and settings

Be alert to signs of abuse and question unusual behaviour

If you have concerns about a child's welfare…

Where a child also discloses abuse or neglect:

- Listen; take their allegation seriously; reassure that you will take action to keep them safe
- Inform them what you are going to do next
- Do not promise confidentiality
- Do not question further or approach/inform the alleged abuser

Report concerns to the Designated/Named Safeguarding Lead or their deputy:

NAME……

The Designated/Named Safeguarding Lead will:

- **consider further actions required, including consultation with MASH (number below)**
- **record in writing the discussions, decisions and reasons for decisions.**

In exceptional circumstances or in the absence of a Safeguarding Lead you may contact MASH directly.

If a referral is not required: The Designated Safeguarding Lead will oversee relevant action, eg pastoral support, and/or early help assessment and monitor locally.

If concerns continue

The Designated/Named Safeguarding Lead (or staff) will contact MASH to make a referral

Additional/unmet needs – the Designated Safeguarding Lead will consult with relevant agencies and undertake an Early Help CAF and Team around the Child meetings.

- **Multi-Agency Safeguarding Hub (MASH):** 0300 456 0108
- **Out of Hours Emergency Duty Service:** 0300 456 0100 (5.00pm to 9.00am weekdays, 4:00pm Friday to 9:00am Monday)
- If the child is in **immediate risk**, dial 999 and ask for police assistance

MASH will:

1. Acknowledge receipt of referral
2. Decide on next course of action (within 1 working day)
3. Provide feedback decision to referrer (e.g. further assessment including: strategy discussion/child protection enquiries; no further action required for children's social care and early help assessment/CAF recommended; referral to other agency for service provision).

This flowchart is intended for use as a brief guide. Refer to the DfE Guidance What to do if you are worried a child is being abused for more information, definitions and possible indicators of abuse (including child sexual exploitation).

SVPP website: www.wiltshirescb.org.uk Reviewed: September 2020

Appendix 2

BISHOPSTROW COLLEGE

Concern Form Part A

- **Part A** is to be completed by the adult who first has a concern and reported to the Designated Safeguarding Lead (DSL) without delay.
  Separate concern forms should be completed for both alleged instigator(s) and victim(s) of incidents.
- **Part B** is to be completed by the DSL

Child's name			
Date of birth This may be added by the DSL having ensured there is no risk of confusion if children have similar names			
Name of member of staff/person reporting the concern	**PLEASE PRINT**		
	Signature		
Role			
Date DD/MM/YYYY		**Time**	

Concern(s) - Use the body- map below to show any marks or injuries.		
Additional form used?	**Yes / No**	**Page of**

Children must not be undressed or photographs taken of any marks or injuries

Safeguarding concern record – schools - 2021

Concern Form Part B

To be completed by the Designated Safeguarding Lead (D/DSL)

Name of D/DSL reviewing the concern					
Safeguarding support already in place Tick and add name where known at time of report					
None	**ESA or Support Assessment**	**Child in Need**	**Child Protection Plan**	**Looked After**	**Previous social care involvement**
Name and role of allocated worker					
Data analysis: if the concern relates to peer on peer abuse, state which:	*This includes any reports and concerns, including those outside the school and online:* o bullying (including cyberbullying, prejudice-based and discriminatory bullying) o abuse in intimate personal relationships between peers o physical abuse o sexual violence		o sexual harassment o causing someone to engage in sexual activity without consent o consensual and non-consensual sharing of nudes and semi nudes images and or videos o upskirting o initiation/hazing type violence and rituals		

Name of person taking actions	Actions – include whether concerns were shared with parents/carers, MASH and if not outline reasons why	Date of action

A summary of actions must be shared with the person who raised the concern			
Summary shared by		**Date**	
Case discussion to reflect any 'gut-feeling' elements from the person reporting the concern as well as what the impact on the child		**Yes / No**	
If actions agreed **Signature of person (overleaf) who raised the concern**			
If actions *not* agreed **A file note added to the child's file with a summary of discussion and the outcome/s.** **Signature of person who raised the concern overleaf**	**File note document number**		

Safeguarding concern record – schools - 2021

Appendix 3 Types of abuse and neglect

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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 from 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 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.
- non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

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

The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers);
- or ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Specific safeguarding issues from Annex B of KCSIE (2023)

Each year, as part of the annual review of this document, the specific level of concern of each of these relevant to Bishopstrow College will be reconsidered. This risk assessment informs our training approach for the coming year. Although many of these issues are taught and discussed as a routine part of PSHEE, we will amend the normal provision if this risk assessment indicates particular need.

Issue	**Risk level**
Child abduction and community safety incidents	Low – no students known to be affected & no known local risk
Children and the court system	Low – no students known to be affected
Children missing education (CME)	Low – no known risk
Children with family members in prison	Low – no students affected
Child criminal exploitation (CCE) and child sexual exploitation (CSE)	Low – extremely difficult for this type of contact to be made with Bishopstrow students
County lines and/or gangs	Low – extremely difficult for this type of contact to be made with Bishopstrow students
Modern slavery	Low – Bishopstrow fees and structures virtually rule this out
Cybercrime	Low to Moderate – we have high ability students & their online activity in their mother tongue might be difficult for us to monitor fully
Domestic abuse (DA)	Low – no students known to be affected and fully boarding setting will be protective
Homelessness	Low – no students known to be affected
So-called 'honour-based' abuse, including female genital mutilation (FGM) and forced marriage. FGM and forced marriage, other than 'honour-based'.	Low – no Bishopstrow students are currently from a background where this is perceived to be a risk

Preventing radicalisation	Low to Moderate – any student could potentially be at risk of some type of radicalisation, perhaps especially as they are away from home.
The Prevent duty, Channel, and Additional support	Low – usual care taken in curriculum PSHEE, wider life of College
Child-on-child / child-on-child abuse	Moderate – any student could potentially be at risk, perhaps especially as they are away from home.
Sexual violence and sexual harassment between children in schools and colleges	Moderate – any student could potentially be at risk, perhaps especially as they are from different cultures, we have a wide age range and they often have low level of common language.
Upskirting	Moderate – as above.
The response to a report of sexual violence and sexual harassment between children in schools and colleges	Currently reviewing our training in this area and updating staff with courses and discussions.
Mental Health	Low to Moderate – any student could potentially be affected depending on circumstance. We are currently reviewing our training in this area.
Serious Violence	Low – effective behaviour policy in force; mutual respect via 'Five virtues' fostered. No evidence of serios violence ever being an issue.

Appendix 4 Recognising abuse & neglect

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- must be regarded as indicators of possible significant harm
- justify the need for careful assessment and discussion with designated/named/lead person, manager, (or in the absence of all those individuals, an experienced colleague)
- may indicate a requirement for consultation with and/or referral to Children's Social Care/ MASH.

Generally, in an abusive relationship the child may:

- appear frightened of the parent/s or other household members e.g. siblings or others outside of the home
- act in a way that is inappropriate to her/his age and development (although full account needs to be taken of different patterns of development and different ethnic groups).

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into or have contact with the household.

Indicators of Physical Abuse

This section provides information about the sites and characteristics of physical injuries which may be observed in abused children. It is intended primarily to assist non-medical staff in the recognition of bruises, burns and bites which should be referred to MASH and / or require medical assessment.

Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained injuries including bruises, burns, particularly if they are recurrent
- Improbable excuses given to explain injuries
- Unexplained delay in seeking treatment
- Parents/carers are uninterested or undisturbed by an accident or injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries which may represent a 'cry for help' and if ignored could lead to a more serious injury or may represent fabricated or induced illness
- Repeated use of different doctors, A&E departments and other forms of direct health provision
- Reluctance to give information or mention previous injuries
- Refusal to discuss injuries
- Untreated injuries
- Admission of punishment which seems excessive
- Bald patches

- Bruising, biting, burns, scalds, scars
- Withdrawal from physical contact
- Self-harming
- Arms and legs covered, even in hot weather
- Fear of returning home
- Fear of medical help
- Self-destructive tendencies
- Aggression towards others
- Running away.

Indicators of Emotional Abuse

- Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. Manifestations of emotional abuse may also indicate the presence of other kinds of abuse.
- The indicators of emotional abuse are often also associated with other forms of abuse. Recognition of emotional abuse is usually based on observations over time and the following offers some associated indicators.

Parent / carer & child relationship factors

- Abnormal attachment between a child and parent/carer e.g. anxious, insecure or avoidant, indiscriminate or no attachment
- Indiscriminate attachment or failure to attach
- Conveying to children they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person e.g. persistent negative comments about the child or 'scape-goating' within the family
- Developmentally inappropriate or inconsistent expectations of the child which are outside what is considered reasonable and acceptable cultural/legal norms e.g. over-protection, limited exploration and learning, interactions beyond the child's developmental capability, prevention of normal social interaction
- Causing children to feel frightened or in danger e.g. witnessing domestic violence, seeing or hearing the ill treatment of another.

Child presentation concerns

- Behavioural problems e.g. aggression, attention seeking, hyperactivity, poor attention
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem, lack of confidence, fearful, distressed, anxious
- Poor peer relationships including withdrawn or isolated behaviour.

Parent/carer related issues

- Dysfunctional family relationships including domestic violence
- Parental problems that may lead to lack of awareness of child's needs e.g. mental illness, substance misuse, learning difficulties
- Parent or carer emotionally or psychologically distant from child.

Indicators of Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently too scared to say anything due to guilt and/or fear. The child may fear s/he will not be believed and/or fear repercussions due to possible threats that may have been made

This form of abuse is particularly difficult for a child to talk about and full account should be taken of cultural sensitivities of individual child / family

Recognition of sexual abuse can be difficult, unless the child tells others of the abuse, their account is believed and the suspected abuse referred to Children's Social Care and/or the police. There may be no physical signs and indications of sexual abuse are most likely to be emotional/behavioural.

Behavioural indicators

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes for sports events (but this may be related to cultural norms or physical difficulties)
- Running away.

Physical indicators

- Sexually transmitted diseases
- Vaginal soreness or bleeding
- Pregnancy.

Indicators of Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting e.g. neglect of the child's physical needs possibly causing non-organic failure to thrive; neglect of the child's developmental emotional needs which may contribute to cognitive delay; neglect of the child's emotional needs resulting in behavioural markers.

Child related indicators

- Non–organic failure to thrive/faltering growth
- Delay in achieving developmental, cognitive and /or other educational milestones
- A child who is unkempt or inadequately clothed or dirty or smells
- A child who is perceived to be frequently hungry, scavenging
- Behavioural signs may include a child seen to be listless, apathetic and unresponsive with no apparent medical cause, anxious attachment, aggression, indiscriminate friendliness
- Failure of child to grow or develop within normal expected pattern, with accompanying weight loss or speech language delay
- Recurrent /untreated infections or skin conditions e.g. severe nappy rash, eczema or persistent head lice/scabies
- Unmanaged /untreated health/medical conditions including poor dental health

- Frequent accidents or injuries
- Child frequently absent from or late to school
- Sudden changes in behaviour or in school performance
- Poor self-esteem
- Child thrives away from home environment.

Indicators in the care provided

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene
- Failure by parents or carers to meet the child's health and medical needs e.g. poor dental health; failure to attend or keep appointments with health visitor, GP or hospital; lack of GP registration; failure to seek or comply with appropriate medical treatment; failure to address parental substance misuse during pregnancy
- A dangerous or hazardous home environment including failure to use home safety equipment; risk from animals
- Poor state of home environment e.g. unhygienic facilities, lack of appropriate sleeping arrangements, inadequate ventilation (including passive smoking) and lack of adequate heating
- Lack of opportunities for child to play and learn
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods.

Appendix 5 Further Information on Specific Safeguarding Topics

Children Missing from Education

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

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

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

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

All schools must inform their local authority of any student who is going to be removed from the admission register where the student:

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

The local authority must be notified when a school is to remove a student from its register for any of the six grounds above. This should be done as soon as these grounds for removal from the register are met, and in any event no later than removing the student's name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty to identify

children of compulsory school age who are missing education and follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

***All schools must inform the local authority of any student who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority*.**

Colleges
Where a college is providing education for a child of compulsory school age, the college shall work collaboratively with the appropriate local authority in order to share information about the attendance and/or absences of that child as the local authority deems necessary, as set out in departmental advice- Enrolment of 14 to 16 year olds in full time further education. The college should also inform the relevant local authority immediately if that child is removed from roll so that the local authority can as part of their duty identify children of compulsory school age who are missing education.

Child Sexual Exploitation
Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

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

Child Criminal exploitation, Serious violence; and gang related activity
Children who are at risk of criminal exploitation or serious violence may display the following indicators:

- they have increased absence from school;
- they go missing;
- they have a change in friendships;
- they have friendships with older individuals or groups;
- they have unexplained gifts or money
- they display a significant decline in performance;
- their wellbeing declines

Advice for school staff is available in the Home Office *Guidance Preventing Youth Violence and Gang Involvement* and *Criminal exploitation of children and vulnerable adults: county lines guidance*.

So-called 'Honour-Based' Violence

So-called 'Honour-Based' Violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the Designated Safeguarding Lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Indicators

There are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 41-42 of the *Multi Agency Statutory Guidance on Female Genital Mutilation* (FGM). *Multi Agency Statutory Guidance on FGM* (pages 60-62 focus on the role of schools and colleges) and pages 13-14 of the *Multi agency guidelines: Handling cases of forced marriage*.

Actions

If staff have a concern regarding a child that might be at risk of HBV they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers** that requires a different approach (see following section).

Female Genital Mutilation (FGM) mandatory reporting duty

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

Section 5B of the *Female Genital Mutilation Act* 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at *Mandatory reporting of female genital mutilation procedural information*.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college's designated safeguarding lead and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet. Further details can be found in Annex A, KCSIE, Sept 2019.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: **fmu@fco.gov.uk.**

Preventing Radicalisation

Protecting children from the risk of radicalisation should be seen as part of schools' and colleges' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

Prevent

From 1 July 2015 all schools and all colleges are subject to a duty under section 26 of the *Counter-Terrorism and Security Act* 2015 ("the CTSA 2015"), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". For full details please refer to the *Prevent duty*.

Revised Prevent duty guidance: for England and Wales is specifically concerned with schools (but also cover childcare). There is separate guidance: *Prevent duty guidance: for further education institutions in England and Wales* that applies to colleges. These place a duty to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015. Paragraphs 57-76 of *The Statutory*

Revised Prevent duty guidance: for England and Wales are specifically concerned with schools (but also cover childcare). Please refer to this document for further guidance on the following four general themes:

- Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. Schools should have clear procedures in place for protecting children at risk of radicalisation. It is not necessary for schools to have distinct policies on implementing the Prevent duty.

- The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of the Local SVPP. Schools should also discuss any concerns in relation to possible radicalisation with a child's parents in line with the individual school's safeguarding policies and procedures unless they have specific reason to believe that to do so would put the child at risk.

- The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to students at the school of being drawn into terrorism.

- Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools.

There is additional guidance: *Prevent duty guidance: for further education institutions in England and Wales* that applies to colleges.

Channel
School and college staff should understand when it is appropriate to make a referral to the Channel programme. Channel guidance is available at Channel guidance and an e-learning channel awareness programme for staff is available at: Channel General Awareness.

Wiltshire Prevent processes

There are several ways you can seek advice:

- Visit Action Counters Terrorism: ACT Early
- Call the National Prevent Advice Line on 0800 011 3764 for friends, families and community members
- Speak to your designated safeguarding lead (if applicable)
- Call the local Prevent team on 01278 647466
- Call 101 and state you would like some advice regarding a Prevent concern
- If you see or hear something that could be terrorist related call the anti-terrorist hotline on 0800 789 321
- If you require urgent police assistance dial 999

To make a referral, email: PreventReferrals@wiltshire.police.uk

It is crucial to note that Prevent is a supportive space and does not get people in trouble or criminalise them. It is about safeguarding them from the potential impact of extremism and radicalisation.

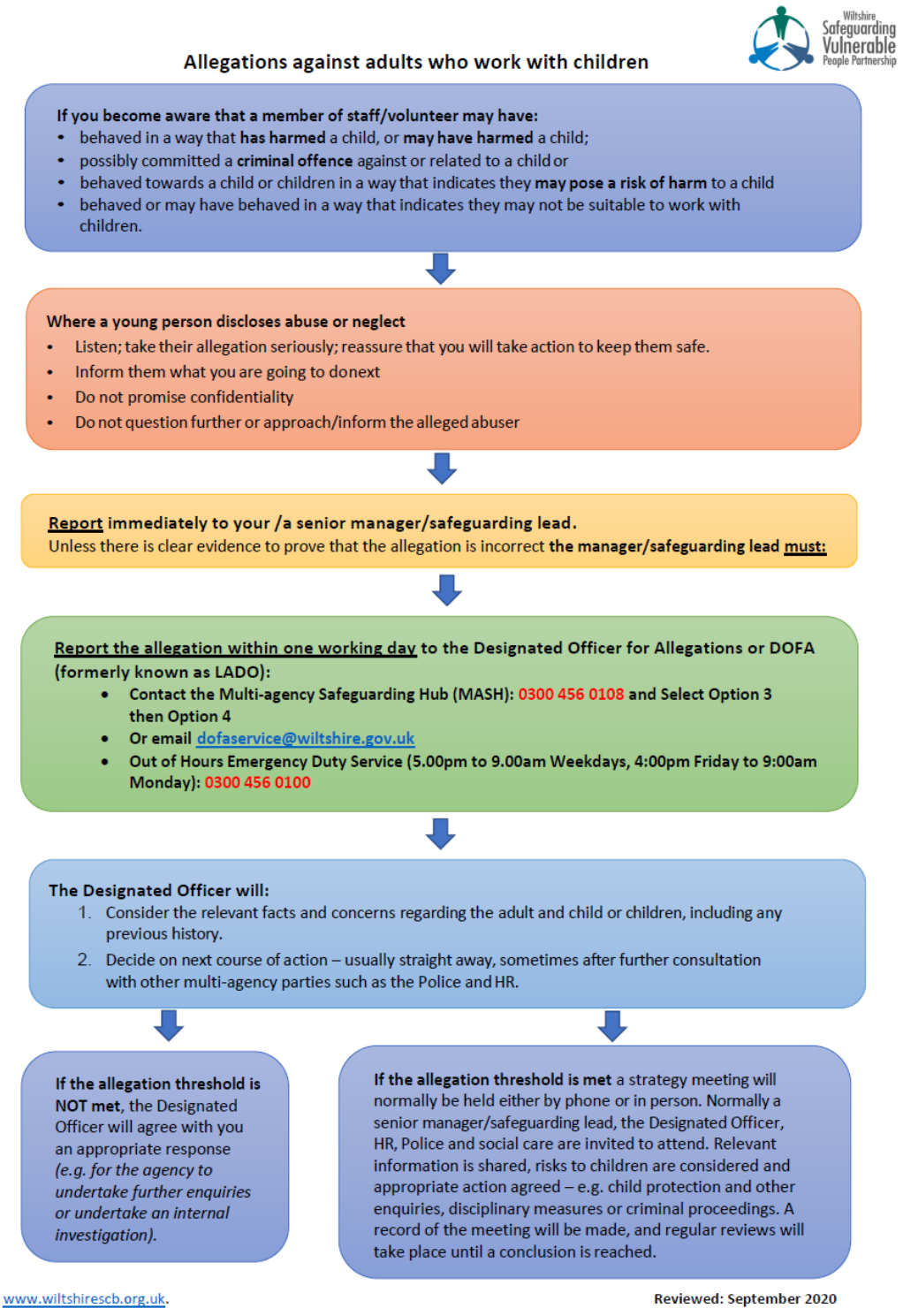
British values

All maintained schools must meet the requirements set out in section 78 of the Education Act 2002 and promote the spiritual, moral, social and cultural (SMSC) development of their students. Through ensuring students' SMSC development, schools can also demonstrate they are actively promoting fundamental British values.

Actively promoting the values means challenging opinions or behaviours in school that are contrary to fundamental British values. Attempts to promote systems that undermine fundamental British values would be completely at odds with schools' duty to provide SMSC. The Teachers' Standards expect teachers to uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside school. This includes not undermining fundamental British values.

To find guidance on British values within schools visit:
https://www.gov.uk/government/publications/promoting-fundamental-british-values-through-smsc

Appendix 6 DOFA referral Process



Appendix 7 - Role of the Designated Safeguarding Lead, (Keeping Children Safe in Education, 2023)

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description.

The designated safeguarding lead should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.

Deputy designated safeguarding leads

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

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Manage referrals

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and

- where a crime may have been committed to the Police as required. NPCC – When to call the police should help understand when to consider calling the police and what to expect when working with the police.

Working with others

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- as required, liaise with the "case manager" and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs co- ordinators (SENCO's), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes:
    - ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
    - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

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

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of this guidance.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCO's) or the named person with oversight for SEND in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising Awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

Training, knowledge and skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead (and any deputies) should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend any relevant or refresher training courses, and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them, and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

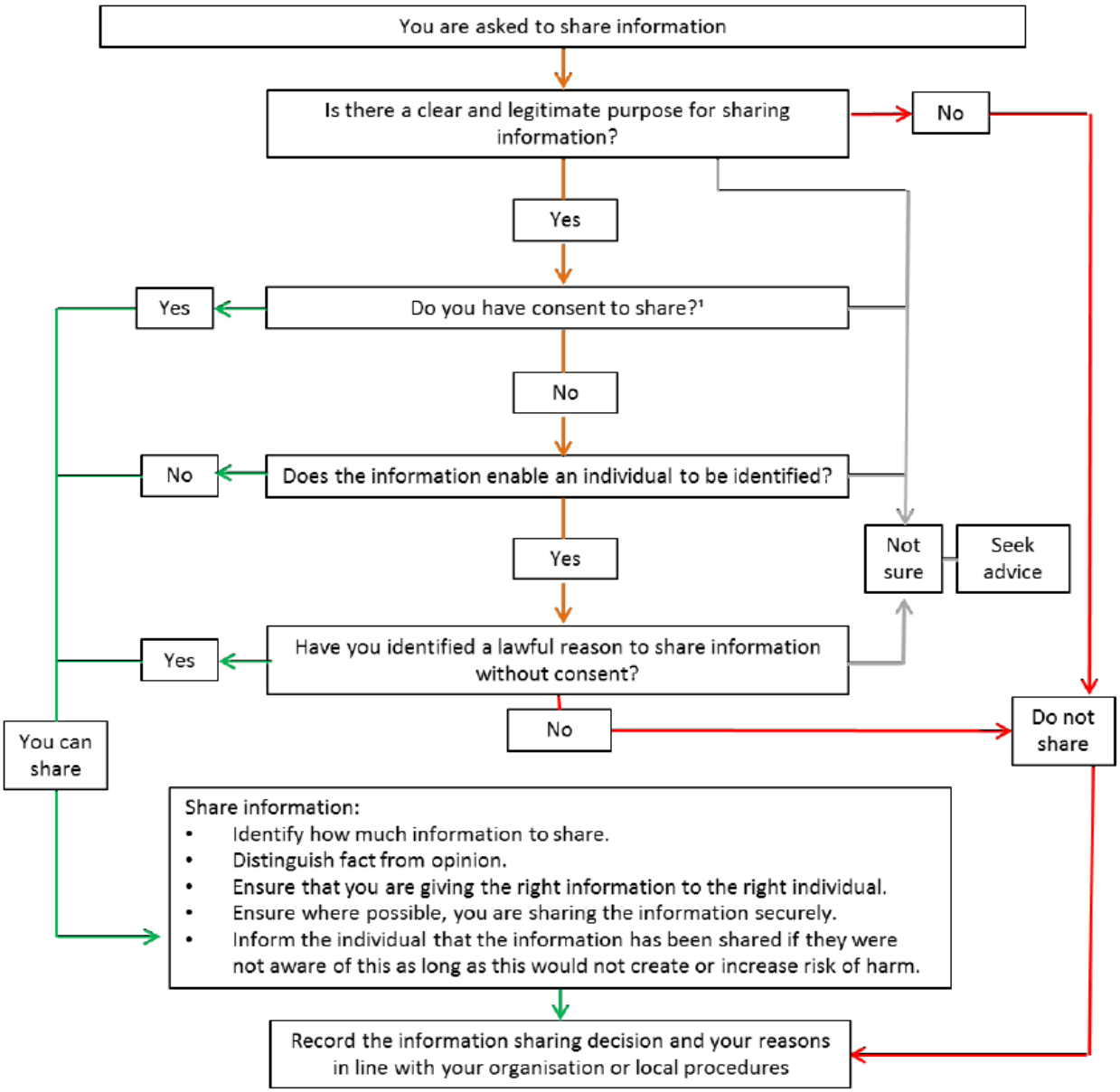
Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of this document, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

Appendix 8 – Information Sharing advice for practitioners

Flowchart of when and how to share information



If there are concerns that a child is in need, suffering or likely to suffer harm, then follow the relevant procedures without delay. Seek advice if unsure what to do at any stage and ensure that the outcome of the discussion is recorded.

1. Consent must be unambiguous, freely given and may be withdrawn at any time

Appendix 9 Links to Government Guidance Documents

National and Local Government Guidance can be found by entering the headings below into your usual search engine.

The Government Website www.gov.uk provides a wide range of guidance which is easily accessed from the search box.

The following are particularly useful for schools:

- **Keeping Children Safe in Education – Sept 2023**: **Keeping Children Safe in Education (2023)**
- **Working Together to Safeguard Children - July 2018: Working together to safeguard children**
- **What to do if you're worried a child is being abused: What to do if you're worried a child is being abused**
- **The Education Inspection Framework: The Education Inspection The Education Inspection framework**
- **Safeguarding children and young people and young vulnerable adults: Ofsted safeguarding policy**
- **Section 11 of the Children Act 2004: The Children Act 2004**
- **Section 175 of The Education Act 2011: The Education Act 2011**
- **Education and Training (Welfare of Children) Act 2021: Education and Training (Welfare of Children) Act 2021**
- **Criminal Exploitation: Criminal Exploitation of Children and Vulnerable Adults**
- **Serious Violence: Preventing youth violence and gang involvement**
- **Schools transgender guidance: https://www.wiltshirehealthyschools.org/news/items/new_guidance_on_supporting_transgender_pupils_in_schools-2021-08-12**
- **GDPR: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/711097/guide-to-the-general-data-protection-regulation-gdpr-1-0.pdf**
- **NSPCC helpline to support victims of sexual harassment and abuse in education settings 0800 136 663**

Appendix 10 Low Level Concern Form

BISHOPSTROW COLLEGE

Low Level Concern Form

Please use this form to share any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with Bishopstrow College's Staff Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary). The record should be signed, timed and dated.

Details of concern

Name of reporting staff member:		**Description of Role:**	
Name of adult of concern:		**Description of Role:**	
Detail:			
Signed:		**Time and Date:**	
Received by:		**At (time):**	
		On (date):	
Action taken: (Specify):			
Signed:		**Time and Date:**	

This record will be held securely in accordance with Bishopstrow College's low-level concerns policy. Please note that low-level concerns will be treated in confidence as far as possible, but the College may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.