



Earlscliffe (Sussex Summer Schools Ltd)

SAFEGUARDING POLICY

This is a core Earlscliffe school policy that forms part of induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.

This policy will be reviewed at least annually, and / or following any updates to national and local guidance and procedures.

Key Contact Personnel in School

Designated Safeguarding Lead:	Holly Goodwin, Head of Pastoral Care & Boarding
Deputy Designated Safeguarding Leads:	Joss Williams, Head Teacher Sam Hastings, Teacher/Head of Year
Named Safeguarding Governor:	Tim Fish, Managing Director, Dukes Education
Regulatory & Compliance Director (Dukes Education):	Paul Ludlow

Date reviewed: 9th August 2021 (new KCSiE applies from September 2021)

Date of next review: January 2022

Contents

What to do if you have a welfare concern	4
1. Introduction and Ethos	5
2. Definition of Safeguarding	5
3. Context	5
4. Related Safeguarding Policies	6
5. Key Responsibilities	7
6. Recognition and Types of Abuse and Neglect	9
7. Safeguarding and Child Protection Procedures	9
8. Record Keeping	11
9. Multi-Agency Working	11
10. Confidentiality and Information Sharing	12
11. Complaints	12
12. Staff Induction, Awareness and Training	12
13. Safe Working Practice	13
14. Staff Supervision and Support	13
15. Safer Recruitment	13
16. Allegations Against Members of Staff and Volunteers	14
17. Peer on Peer Abuse	14
18. Safeguarding Children with Special Educational Needs and Disabilities	15
19. Online Safety	15
20. Child Criminal Exploitation (CCE)	16
21. Child Sexual Exploitation (CSE)	16
22. Female Genital Mutilation (FGM)	17
23. Radicalisation & the Prevent Duty	17
24. Honour Based Violence	17
25. Serious Violence	18
26. Mental Health	18
27. Early Help (KCSiE 2021)	18
28. Domestic Abuse	18
29. Child Missing from Education	18
30. Curriculum and Staying Safe	19
31. The use of School Premises by Other Organisations	19
32. Security	19
33. Monitoring and Review	19
34. Local Support	20

What to do if you have a welfare concern

Earlscliffe is a boarding school and therefore welfare concerns could occur 24 hours a day, 7 days a week. It is important the staff consider the nature of a boarding school - we are caring for students in place of parents or guardians during term time, and thus have an elevated level of responsibility.

Immediately record your concerns

- Follow the school's procedure – create a written document
 - Reassure the child
 - Clarify concerns if necessary (**T**ED: **T**ell, **E**xplain, **D**escribe)
 - Use child's own words
 - Sign and date your records

Inform the Designated Safeguarding Lead (**Holly Goodwin Ext 355/525 (mobile)**) or Deputy Designated Safeguarding Leads (**Joss Williams Ext 340/040**) Designated Safeguarding Lead

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home
- Access the KSCB Support Level Guidance document and procedures: www.kscb.org.uk
- Refer to other agencies as appropriate e.g. Internal or community services, LADO, Police or Request for Support
- If unsure then consult with Area Education Safeguarding Advisor (03000 415 648 / 07917 602 413 / 07966 322 751) or Local Authority Social Worker at Integrated Front Door 03000 411 111 / 03000 419 191

If you are unhappy with the response

Staff:

- Contact Safeguarding Governor
- Follow Whistleblowing procedures

Pupils and Parents:

- Follow school complaints procedures (www.earlscliffe.co.uk)

At all stages the child's circumstances will be kept under review

The DSL / staff will request further support if required to ensure the **child's safety** is **paramount**

Record decision making and action taken in the pupil's Child Protection / safeguarding file / CPOMS Monitor

Be clear about:

- What you are monitoring e.g. behaviour trends, appearance etc.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

Review and request further support (if necessary) Why are you concerned?

- For example
 - Allegation/ child shares a concern or worry
 - Indicators of abuse or neglect
 - Witnessed concerning behavior
 - Behaviour change

1. Introduction and Ethos

- Earlscliffe is a community and all those directly connected (staff, governors, guardians, parents, families and pupils) have an essential role to play in making it safe and secure. Earlscliffe recognises our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding and child protection is at the forefront and underpins all relevant aspects of process and policy development at Earlscliffe.
- Earlscliffe recognises the importance of providing an ethos and environment within school that will help children to be safe and feel safe. In our school children are respected and encouraged to talk openly. Where there is a safeguarding concern, children's wishes and feelings should be taken into account when determining what action to take and what services to provide. Children and young people should know that their concerns will be treated seriously and they can safely express their views.
- Staff should recognise that children and young people might not find it easy to talk about their abuse verbally. Staff should be aware of signs and behaviours that might indicate abuse. Staff might also overhear conversations that suggest a child has been harmed or might receive a report from a friend of the child.
- Our school core safeguarding principles are:
 - We are an important part of the wider safeguarding system for children.
 - It is our whole school responsibility to safeguard and promote the welfare of children.
 - All children (defined as those up to the age of 18) regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
 - All children have a right to be heard and to have their wishes and feelings taken into account.
 - All our staff understand safe professional practice and adhere to our safeguarding policies.

2. Definition of Safeguarding

- "Safeguarding is not just about protecting children, learners and vulnerable adults from deliberate harm, neglect and failure to act. It relates to broader aspects of care and education." (Inspecting safeguarding in early years, education and skills settings, Ofsted, September 2018).
- All safeguarding policies will be reviewed on an annual (minimum) basis by the Governing Body which has responsibility for oversight of school safeguarding and child protection systems. The Designated Safeguarding Lead / Head Teacher will ensure regular reporting on safeguarding activity and systems in school to the Governing Body. The Governing Body will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.
- There are four main elements to our child protection policy
 - **Prevention** (e.g. positive, supportive, safe school culture, curriculum and pastoral opportunities for children, safer recruitment procedures);
 - **Protection** (by following the agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to safeguarding concerns);
 - **Support** (for all pupils, parents and staff, and where appropriate specific intervention for those who may be at risk of harm);
 - **Working with parents and other agencies** (to ensure appropriate communications and actions are undertaken).
- The school recognizes the central importance of wellbeing and good mental health to its students, and will endeavour to give proactive support to any student experiencing mental health problems.

- The procedures contained in this policy apply to all staff (including temporary staff and volunteers) and governors and are consistent with those of Kent Safeguarding Children Board (KSCB).

3. Context

- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:
 - DfE guidance Keeping Children Safe in Education, September 2021 (KCSiE)
 - Working Together to Safeguard Children 2018 (WTSC)
 - Ofsted guidance 'Inspecting safeguarding in early years, education and skills settings' (2018)
 - Framework for the Assessment of Children in Need and their Families (2000)
 - Kent and Medway Safeguarding Children Procedures (online)
 - Early Years and Foundation Stage Framework 2017 (EYFS)
 - Prevent Duty Guidance (2015; updated 2019)
 - Teaching Online Safety in Schools (2019)
- Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
- The school acknowledges that this policy recognises a range of specific safeguarding issues including (but not limited to):
 - Bullying (including cyberbullying)
 - Children and the court system
 - Children Missing Education (CME)
 - Children with family members in prison
 - Child missing from home or care
 - Child Sexual Exploitation (CSE)
 - Child criminal exploitation (including County Lines)
 - Domestic Abuse
 - Homelessness
 - Drugs and alcohol misuse
 - Fabricated or induced illness
 - Faith abuse
 - Female Genital Mutilation (FGM)
 - Forced marriage
 - Gangs and youth violence
 - Gender based abuse and violence against women and girls
 - Hate
 - Honour based abuse
 - Mental health
 - Missing children and adults
 - Online safety
 - Peer on Peer Abuse
 - Prevent duty (radicalisation and extremism)
 - Private fostering
 - Relationship abuse
 - Sexual violence and sexual harassment between children
 - Human trafficking and modern slavery

- o Youth produced sexual imagery or “Sexting”

(Also see Annex A within ‘Keeping children safe in education’ 2021)

4. Related Safeguarding Policies

This policy is one of a series in the school’s integrated safeguarding portfolio and should be read in conjunction with the policies as listed below:

- o Homesickness
- o Intimate care
- o Confidentiality
- o Anti-Bullying
- o Cyber-Safety
- o Anti Cyber Bullying
- o Guidance on interaction with pupils
- o DBS
- o Adults staying with resident staff
- o Photography
- o Missing pupils
- o External helplines and counselling
- o Pupil supervision
- o Safeguarding external contractors
- o Safeguarding drivers and escorts
- o Health and safety
- o Accident reporting
- o Trips and visits
- o Risk assessment, including specific measures during Covid-19 pandemic
- o Safety in boarding houses
- o Fire Safety
- o Complaints
- o ICT
- o Data protection
- o Security
- o Whistle blowing
- o Anti-bullying guidance for staff
- o Safer recruitment
- o Absences
- o Behaviour
- o Borders and crisis management
- o PSHE
- o SMSC
- o Statement of policy on use of restraint
- o Preventing extremism and radicalisation
- o Low level concerns

5. Key Responsibilities

- The governing body, Head Teacher and Senior Leadership Team (SLT) have read and will follow KCSIE 2021.

- The school has a nominated governor for safeguarding. The nominated governor will take the lead role in ensuring that the school has an effective policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required.
- The Governing Body and Senior Leadership Team will ensure that the DSL is properly supported in their role.

5.1 Designated Safeguarding Lead (DSL)

- The school has appointed a senior member of staff (Holly Goodwin, Head of Pastoral & Boarding) as the Designated Safeguarding Lead (DSL). The DSL has the overall responsibility for the day to day oversight of safeguarding and child protection systems in school.
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The DSL and deputy DSL's training will be updated formally every two years but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.
- Deputy DSLs are trained to the same standard as the DSL. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- **It is the role of the DSL to:**
 - Act as the central contact point for all staff to discuss any safeguarding concerns
 - Maintain a confidential recording system for safeguarding and child protection concerns
 - Coordinate safeguarding action for individual children
 - In the case of Children Looked After the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child (with the DSL liaising closely with the designated teacher)
 - Liaise with other agencies and professionals in line with WTSC 2018
 - Ensure that locally established referral procedures are followed as necessary
 - Represent, or ensure the school is appropriately represented at multi-agency safeguarding meetings (including Child Protection conferences)
 - Manage and monitor the school's role in any multi-agency plan for a child.
 - Be available during term time (during school hours) for staff in the school to discuss any safeguarding concerns
 - Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSi E (2021)
 - Regularly review actions to look for patterns of concerning behaviour
 - In responding to allegations which are found to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child or person who has made the allegation is in need of support or may have been abused by someone else

5.2 Members of Staff

- **All members of staff have a responsibility to:**
- To provide a safe environment in which children can learn.
- Be prepared to identify children who may benefit from early help.
- Consider wider environmental factors in a child's life that may be a threat to their safety and/or welfare.
- To understand the early help process and their role in it.
- To understand Earlscliffe's safeguarding policies and systems.

- To undertake regular and appropriate training which is regularly updated.
- Be aware of the process of making referrals to children's social care and statutory assessment under the Children Act 1989.
- Know what to do if a child tells them that he or she is being abused or neglected.
- Know how to maintain an appropriate level of confidentiality.
- Be aware of the indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.
- Know that any member of staff can make a referral. This does not require parental consent for referrals to statutory agencies.
- Reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- be aware of the possible health needs that might arise following sexual assault, such as physical, mental and sexual health problems.

5.3 Children and Young People

- **Children and young people (pupils) have a right to:**
 - Contribute to the development of school safeguarding policies
 - Receive help from a trusted adult.
 - Learn how to keep themselves safe by recognising when they are themselves at risk and how to get help when they need it, including online.

5.4 Parents and Carers

- **Parents / carers have a responsibility to:**
 - Understand and adhere the relevant school policies and procedures.
 - Talk to their children about safeguarding issues and support the school in their safeguarding approaches.
 - Identify behaviours which could indicate that their child is at risk of harm including online and seek help and support from the school, or other agencies.

Parents can obtain a copy of the school Child Protection Policy and other related policies on request and can view them via the school website

(<https://sixthform.earlscliffe.co.uk/page/safeguarding-policies-and-guidelines/>).

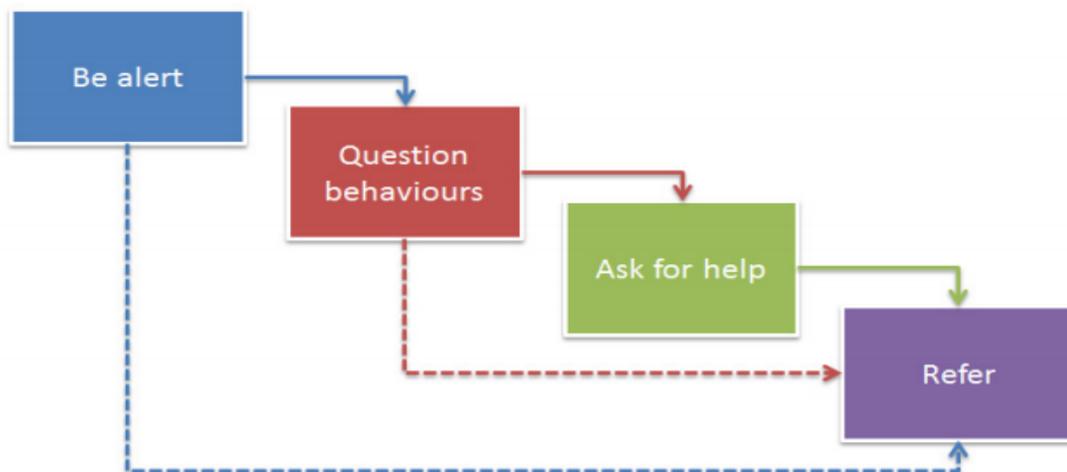
6. Recognition and Types of Abuse and Neglect

- All staff in school should be aware of the definitions and indicators of abuse and neglect. There are four categories of abuse:
 - Physical abuse
 - Sexual abuse
 - Emotional abuse
 - Neglect
- Members of staff are aware that child welfare concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness.

- The warning signs and symptoms of child abuse and neglect can vary from child to child. Children also develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child.
- Parental behaviours may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions or concerning parental behaviours (including the possibility that the child may have witnessed domestic abuse at some point); this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Abuse may take place between children or students themselves, so staff should be aware of the possibility of peer-on-peer abuse.
- By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

7. Safeguarding and Child Protection Procedures

- Earlscliffe adheres to the KSCB Safeguarding Children Procedures. The full KSCB procedures and additional guidance relating to specific safeguarding issues can be found on the KSCB website www.kscb.org.uk
- All members of staff are expected to be aware of and follow this approach:



- It may not always be appropriate to go through all four stages sequentially and if a child is in immediate danger or is at risk of harm, a request for support should be made immediately to Children's Social Work Services and/or the police.
- **The role of the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer.**
- The DSL may seek advice or guidance from an Area Education Safeguarding Advisor from the Education Safeguarding Service before making a decision regarding next steps. They may also seek advice or guidance from a social worker at the Front Door service.
- All members of staff are made aware of the internal and local early help support services. Where a child is being offered or receiving early help and support, staff will be supported to understand their role in any

early help assessment or intervention. This includes identifying emerging problems, liaising with other professionals, and in some cases acting as the lead practitioner.

- The DSL will keep all early help cases under constant review and consideration will be given to a request for support to the Front Door if the situation does not appear to be improving or is getting worse.
- All staff are aware of the process for making request for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.
- **In all but the most exceptional circumstances, parents /carers will be made aware of the concerns for their child at the earliest possible stage.** In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought in line with guidance provided by KSCB, unless there is a valid reason not to do so, for example if to do so would put a child at risk of harm or would undermine a criminal investigation.
- In the absence of the availability of the DSL to discuss an immediate and urgent concern, staff can seek advice from a Deputy DSL. They may also seek advice from the Education Safeguarding Service or via consultation from a Local Authority social worker at the Front Door. If anyone other than the DSL makes a referral to external services, then they will inform the DSL as soon as possible.
- On occasion, staff may pass information about a child to the DSL but remain anxious about action subsequently taken. Staff should feel able to check the progress of a case with the DSL so that they can reassure themselves the child is safe and their welfare is being considered. If following this process, the staff member remains concerned it is the responsibility of that staff member to follow the school's escalation process.
- If a child's situation does not appear to be improving, then the DSL (or the person that made the request for support) will consider re-referral. Professional disagreements (escalation) will be responded to in line with the KSCB procedures and DSLs may request support via the Education Safeguarding Service.

8. Record Keeping

- If a member of staff has a safeguarding concern, they will make written notes and speak immediately to the DSL or DDSL. The DSL or DDSL will then record the action on CPOMS using the statutory guidance detailed below. Records must be completed as soon as possible after the incident / event, using the child's words.
- All safeguarding concerns, discussions and decisions (and justifications for those decisions) will be recorded in writing. If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL.
- Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school on the CPOMS safeguarding portal. Hard-copy safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are shared with staff on a 'need to know' basis only.
- All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school / setting, under confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained.
- 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, the justification for those decisions, and the outcome.
- The SLT and Governors will be kept informed of any significant issues by the DSL in weekly meetings and reports.

9. Multi-Agency Working

- Earlscliffe recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance (WTSC 2018 – available on the Shared Drive under Policies and Safeguarding)
- Schools are not the investigating agency when there are child protection concerns. We will however contribute to the investigation and assessment processes as required. Earlscliffe recognises the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.
- The Senior Leadership Team and DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.

10. Confidentiality and Information Sharing

- Earlscliffe recognises that all matters relating to child protection are confidential. The SLT or DSL will only disclose information about a pupil to other members of staff on a ‘need to know’ basis.
- All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children.
- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child’s safety or wellbeing.
- DfE Guidance on Information Sharing (July 2018) provides further detail. **A copy is available on the Shared Drive under Policies and Safeguarding**

11. Complaints

- The school has a **Complaints Procedure** available to parents, pupils and members of staff and visitors who wish to report concerns. This can be found **in the Shared Drive under Policies or on the school website**
- All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific **Procedures for Managing Allegations against Staff policy**. This can be found **in the Shared Drive under Policies and Safeguarding**

12. Staff Induction, Awareness and Training

- All members of staff have been provided with a copy of Part One of “*Keeping Children Safe in Education*” (2021) which covers Safeguarding information for all staff. School leaders will read the entire document.

School leaders and all members of staff who work directly with children will access Annex A within Keeping Children Safe in Education 2021. Members of staff have signed to confirm that they have read and understood Part One and Annex A (evidenced in the Single Centre Register).

- The DSL will ensure that all new staff and volunteers (including temporary staff) are aware of the school's internal safeguarding processes.
- All staff members (including temporary staff) will receive training to ensure they are aware of a range of safeguarding issues. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.
- All staff members (including temporary staff) will receive regular safeguarding and child protection updates, at least annually.
- All staff members (including temporary staff) will be made aware of the school's expectations regarding safe and professional practice via the staff behaviour policy and Acceptable Use Policy (available on the Shared Drive under Policies).
- The DSL will provide an annual report to the Governing Body detailing safeguarding training undertaken by all staff and will maintain up to date register of who has been trained.
- Although the school has a nominated lead for the governing body (Tim Fish), all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

13. Safe Working Practice

- All members of staff are required to work within clear guidelines on Safe Working Practice - [Guidance for safer working practice for those working with children and young people in education settings May 2019](#) And the addendum <https://www.saferrecruitmentconsortium.org/GSWP%20COVID%20addendum%20April%202020%20final-2.pdf>
- Staff should be aware of the school's Behaviour Policy, and any physical interventions must be in line with agreed policy and procedures, examples of which are provided therein.
- Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.) and should adhere to the school's Online Safety and Acceptable Use policies.

14. Staff Supervision and Support

- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.
- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.

- The school will provide appropriate supervision and support for all members of staff to ensure that:
 - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
 - All staff will be supported by the DSL in their safeguarding role.
 - All members of staff have regular reviews of their own practice to ensure they improve over time.

The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

15. Safer Recruitment

- Earlscliffe is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff.
- The Governing Body and Senior Leadership Team are responsible for ensuring that the school follows safe recruitment processes outlined within guidance.
- Earlscliffe is responsible for ensuring that the school maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- The Governing Body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.
- We are also committed to supporting the statutory guidance from the Department for Education under the Childcare Act 2006 in schools.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.
- A candidate's identity must be verified using their birth certificate.
- Separate barred list checks should be carried out
 - for newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced certificate with barred list information from the Disclosure and Barring Service (DBS)
 - where a person has worked in a school or college in a role that brought them into regular contact with children and young people, and this role ended not more than three months prior to their new appointment.

A section 128 direction will be disclosed when an enhanced DBS check with children's barred list information is requested, provided that 'child workforce independent schools' is specified on the application form as the position applied for. Where a person is not eligible for a children's barred list check but will be working in a management position in an independent school, a section 128 check should be carried out using the TRA's Employer Access service.

16. Allegations Against Members of Staff and Volunteers

- Earlscliffe recognises that it is possible for staff and volunteers to behave in a way that might cause harm to children and takes any allegation received seriously. KCSIÉ 2021 makes a distinction between high and low

level concerns. All allegations should be referred immediately to the Head Teacher, who, in conjunction with the DSL, will decide if the allegation is low or high level (whether or not it meets the threshold for harm). If high level, the DSL will contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the Head Teacher then staff are advised that allegations should be reported to the Chair of Governors who will contact the LADO in the first instance.

- If low-level, the low-level concerns policy will be followed, as detailed below.

Earlscliffe

Low level concerns Policy

The safety and wellbeing of students at Earlscliffe is dependent on the vigilance of all our staff. This includes prompt communication to the DSL or DDSL regarding any concerns, no matter how small, about any conduct by an adult (over 18) which causes you to doubt that adult's suitability to work with or have access to children.

All references in this policy to "adult" should be interpreted as meaning any adult (defined above) and any visitor, unless otherwise stated.

The college is conscious of its duty of care to students and will always act, including if alerted to the possibility of abuse arising from situations or persons outside the college setting.

The notification and prompt 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.

Code of Conduct

All staff must behave responsibly and professionally in all dealings with children and specifically with students for whom they have a duty of care. All staff must follow the procedures set out in our 'Staff Code of Conduct including Acceptable Use Policy'. Staff should always avoid behaviour which might be misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people 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 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. Staff should note that it is an offence for a person aged 18 or over and in a position of trust to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. A position of trust could arise even if the member of staff does not teach the child.

The college does not permit the use of personal mobile phones to take photographs by staff where children are present.

Our low-level concern policy

The overarching aim of the college's Low-Level Concern Policy is to facilitate a culture in which the clear values and expected behaviours which are set out in our 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 expected behaviours of themselves 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 Code of Conduct; 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.

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 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 he/she considers falls below the standard set out in the 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.

Low-Level Concerns about an adult

From time to time an individual may notice behaviour or actions in others 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 Code of Conduct has not been met.

Any such concerns can be dealt with as a Low-Level Concern.

What should I do if I have one?

Where a low-level concern exists, it should be reported to the DSL or DDSL as soon as reasonably possible and, in any event, within 12 hours of becoming aware of it (Where the concern relates to a particular incident).

How will my low-level concern be handled?

The DSL will discuss all low-level concerns s/he receives with the Head/Principal as soon as possible and in any event within 24 hours of becoming aware of it. The Head/Principal will, in the first instance, satisfy themselves that it is a low-level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure outlined in the safeguarding policy.

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 Head/Principal is in any doubt whatsoever, advice will be sought from the Designated Officer (LADO), if necessary, on a no-names basis.

Having established that the concern is low-level, the DSL or Head/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.

What records will be kept?

Where a low-level concern has been communicated, a confidential record will be kept in a central file which logs all low-level concerns. This is necessary to enable any patterns 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 school's grievance, capability, or disciplinary procedure.

- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the senior leadership team.
- All members of staff are made aware of the school's Whistleblowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email: help@nspcc.org.uk
- Earlscliffe has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or Schools Personnel Service.

When in doubt – consult

17. Peer on Peer Abuse

Earlscliffe has a zero-tolerance approach to peer on peer abuse.

Context

Earlscliffe recognises that sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is important that school staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Staff should understand that even if there are no reports of peer-on-peer abuse at Earlscliffe, this doesn’t mean it is not happening. If staff have any concerns about peer-on-peer abuse, they should speak to the designated safeguarding lead (DSL) or a deputy.

Our peer on peer action plan is detailed below:

Earlscliffe Sixth Form College

Peer on Peer Action Plan

The need for a plan - introduction

We now know that in education generally, some young people have felt that they have not had a voice to raise concerns and even when some did, they felt they were not listened to. Earlscliffe recognises that we must start from the position that harmful behaviours are taking place and affecting our students' lives both in college and outside. In conjunction with our Board of Governors, we have drawn up this action plan to ensure we have put procedures and policies in place for all our students to feel they can raise issues and we will hear and act.

	Aim	Actions need to complete aim	Lead on Action	Deadline for actions to be in place	Signed off as complete by Head/ Principal
1.	Records maintained to demonstrate issue and actions taken	Creation of peer-on-peer harmful behaviours marker on CPOMS	HG	Complete	
		Peer-on-peer behaviours reported to Governors on termly report	HG	Next report	
2.	We need to ensure we are listening for,	Write a policy to ensure we are listening and acting on low level concerns and how these feeds into	HG	Complete	

	recording, and acting on low level concerns.	safeguarding if concerns are of a higher level.			
		Training and support for staff to identify and report low level concerns	HG	Jan 2022 - whole staff safeguarding training	
3.	Students to have a voice to raise issues	Annual student survey to include questions around harmful peer-on-peer behaviours	HG	October 2021	
		Engaging with student voice to identify areas of concern and to identify areas of peer support	HG	Meeting with student council September 2021	
		Create an Anonymous reporting system for students.	HG/ LT	Email address to be set up at start of term and publicised to students	
4.	Training to support staff and governors in managing and identifying issues	Organise annual training on handling peer on peer abuse claims, handling of low-level concerns including misogynistic language	HG	January 2022 training to include all staff and governors.	
5.	To have a RSE & PHSE curriculum that us reviewed annually and to included topics such as pornography, cyber-bullying, healthy relationships, sexting and youth producing sexual imagery.	Review and update annually the RSE & PSHE policies	HG	Complete	
		Training for staff delivering PSE & PSHE curriculum.	HG	Ongoing	

Sexual Violence

Sexual violence includes sexual offences under the Sexual Offences Act 2003 which include:

RAPE: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis. B does not consent to penetration and A does not reasonably believe that B consents.

ASSAULT BY PENETRATION: a person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of his/her body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

SEXUAL ASSAULT: A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Consent

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

A child under the age of 13 can never consent to sexual activity (the age of consent is 16), sexual intercourse without consent is rape, creating or sharing sexual images or vides of under 18s is illegal, including children making or sharing these themselves.

Sexual Harassment

Sexual harassment is “unwanted conduct of a sexual nature” that can occur online and offline. Sexual harassment is likely to violate a child’s dignity and/or make the feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualized environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting; physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media; and
 - sexual exploitation; coercion and threats

Prevention

As a school we will minimise the risk of harm to and allegations against our students by:-

- Providing a developmentally appropriate RSE curriculum through the PSHE syllabus which develops students’ understanding of acceptable behaviour and keeping themselves safe. This includes information on how to keep themselves safe online.
- Having systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued
- Developing robust risk assessments & providing targeted work for students identified as being a potential risk to other students.

18. Safeguarding Children with Special Educational Needs and Disabilities

- Earlscliffe acknowledges that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse.
- Earlscliffe will ensure that children with SEN and disabilities, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.
- Members of staff are encouraged to be aware that children with SEN and disabilities can be disproportionately impacted by safeguarding concerns such as bullying. All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse.

19. Online Safety

- It is recognised by Earlscliffe that the use of technology presents challenges and risks to children and adults both inside and outside of school.
- Earlscliffe recognises that abuse can take place wholly online or technology may be used to facilitate offline abuse.
- The DSL has overall responsibility for online safeguarding within the school.
- Earlscliffe identifies that the issues can be broadly categorised into three areas of risk:
 - **content:** being exposed to illegal, inappropriate or harmful material
 - **contact:** being subjected to harmful online interaction with other users
 - **conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
- The DSL and leadership team have read annex D regarding Online Safety within 'Keeping Children Safe in Education' 2021.
- The DSL and leadership team have read 'Teaching online safety in school' (2019) government guidance and this forms part of the September inset for all staff and has been incorporated into the schools PSHE programme.
- Earlscliffe recognises the specific risks that can be posed by smartphones and cameras and in accordance with KCSIE 2021 has appropriate policies in place that are shared and understood by all members of the school community. Further information regarding the specific approaches relating to this can be found in the school's **Online Safety Policy**, **Acceptable Use Policy** and **Image Use Policy** which can be found in the Shared Drive under Policies.
- Earlscliffe will ensure that appropriate filtering and monitoring systems are in place when pupils and staff access school systems and internet provision.
- Earlscliffe acknowledges that whilst filtering and monitoring is an important part of the school's online safety responsibilities, it is only one part of our approach to online safety. Pupils and adults may have access to systems external to the school control such as mobile phones (3G/4G/5G) and other internet enabled devices and technology and where concerns are identified appropriate action will be taken.

- Earlscliffe will ensure a comprehensive whole school curriculum response is in place to enable all pupils to learn about and manage online risks effectively and will support parents and the wider school community (including all members of staff) to become aware and alert to the need to keep children safe online.

20. Child Criminal Exploitation (CCE)

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

- Earlscliffe recognises the impact of gangs, county lines, violent crime, and exploitation. It is understood that the initial response to child victims is crucial, and that staff will take any allegation seriously and work in ways that support children and keep them safe. All staff have been trained, and recognise the need to be vigilant for the signs of Child Criminal Exploitation that may include, but are not limited to:

Unexplained gifts / new possessions – these can indicate children have been approached by / involved with individuals associated with criminal networks / gangs.

Increased absence from school.

Change in friendships / relationships with others / groups.

Significant decline in performance.

Signs of self-harm / significant change in wellbeing.

Signs of assault / unexplained injuries.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

21. Child Sexual Exploitation (CSE)

- Child Sexual Exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity
 - (a) in exchange for something the victim needs or wants, and / or
 - (b) for the financial advantage or increased status of the perpetrator or facilitator.
- The victim may have been sexually exploited even if the sexual activity appears consensual.
- Child Sexual Exploitation does not always involve physical contact: it can also occur using technology. (Statutory Definition - DfE February 2017).

22. Female Genital Mutilation (FGM)

- Female Genital Mutilation is when female genitals are altered or removed for non-medical reasons. The practice is dangerous and is a criminal offence in the UK.
- FGM is used to control female sexuality and can cause long-lasting damage to physical and emotional health.
- FGM can happen at different times in a girl or woman's life.
- Earlscliffe staff have all been trained to recognise signs that there is a possibility that FGM is about to happen and signs that it may have already taken place.

23. Radicalisation & the Prevent Duty

- The Government's Prevent Duty guidance defines Radicalisation as the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Earlscliffe is committed to providing a safe place in which children and staff understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.
- Government's definition of Extremism - the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty, and respect and tolerance for different faiths and beliefs. The Government also regards calls for the death of members of UK armed forces as extremist.
- Children at risk of radicalisation may display different signs, for example, isolating themselves from family and friends, talking as if from scripted speech, unwillingness, or inability to discuss their views, a sudden disrespectful attitude towards others and increased levels of anger. Peer pressure, influence from other people or via online activity, bullying, race / hate crimes can all be indicators of radicalization.
- Earlscliffe staff will need to exercise their professional discretion to decide if student is at risk and make a referral to the Channel programme.

24. Honour Based Violence

- The Crown Prosecution Service (CPS) has described Honour Based Violence as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and / or honour.
- Such violence can occur when perpetrators perceive that a relative has shamed the family and / or community by breaking their honour code.
- It is a violation of human rights and may be a form of domestic and or sexual violence.

25. Serious Violence

- In Keeping Children Safe in Education (KCSiE), 2021, Serious Violence is now recognized as a specific safeguarding issue. New guidance states that all staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Serious Violence and the issues that can arise from involvement in this is taught as a discrete subject in PSHE.

26. Mental Health

- All Earlscliffe staff should be aware that in some cases mental health problems can be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect, or exploitation.
- Only appropriately trained professionals should attempt to make a diagnosis of mental health problems.
- Staff are well placed to monitor and report concerns to the DSL, who will make necessary referrals to the appropriate professionals.
- Public Health England has produced a range of resources to support secondary schools to promote positive health, wellbeing and resilience among children including its guidance Promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. See Rise Above for links to all materials and lesson plans. The Department has also published 'Every interaction matters', a pre-recorded webinar which provides staff with a simple framework for promoting wellbeing, resilience, and mental health. This sits alongside their Wellbeing for education recovery program content, which covers issues such as bereavement, loss, anxiety, stress and trauma.
- Earlscliffe takes mental health very seriously: the school has a visiting counsellor and an external counsellor and also we support students through encouraging and facilitating discussion on mental health issues.

27. Early Help

- Any child may benefit from Early Help, but Earlscliffe staff should be alert to the potential need for early help for a child who:
 - is disabled and has specific needs;
 - has special educational needs;
 - has a mental health need;
 - is a young carer.

- Staff should be vigilant to students that may benefit from early help and make the necessary referral to the DSL, who will seek advice from external agencies.

28. Domestic Abuse

- The cross-government definition of domestic violence and abuse encompasses any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality.
- The abuse can encompass, but is not limited to, psychological, physical, sexual, financial, and emotional abuse.
- All children can witness and be adversely affected by domestic abuse in the context of their home life where abuse occurs between family members. Exposure to domestic abuse can have serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

29. Child Missing from Education

- All Earlscliffe staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding concerns, including abuse, neglect, child criminal exploitation and child sexual exploitation. It may also indicate mental health problems, substance misuse and possible risk of female genital Mutilation.
- Early intervention is needed to understand the risks involved and to safeguard students. Earlscliffe staff should be aware of the processes to follow should a student go missing. These are detailed in Earlscliffe's [Missing Pupil Policy](#).

30. Curriculum and Staying Safe

- We recognise that schools play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.
- Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that students have a range of contacts and strategies to ensure their own protection and that of others. Online safety is integrated into the curriculum.
- Our school systems support children to talk to a range of staff. Children will be listened to and heard and their concerns will be taken seriously and acted upon as appropriate.

31. The use of School Premises by Other Organisations

- Where services or activities are provided separately by another body using the school premises, the Head Teacher and Governing Body will seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers.

- If this assurance is not achieved then an application to use premises will be refused.

32. Security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within guidance. Visitors will be expected to sign in and out via the reception visitors log and to display a visitors badge whilst on school site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.
- The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

33. Monitoring and Review

- All school staff (including temporary staff and volunteers) will have access to a copy of this policy. The policy will also be available to Parents and Guardians through the school website.
- The policy forms part of our school development plan and will be reviewed annually.

34. Local Support

- All members of staff in Earlscliffe are made aware of local support available
 - **Contact details for Area Safeguarding Advisor (Education Safeguarding Service)**
 - 03000 415 648
 - **Contact details for Online Safety in the Education Safeguarding Service**
 - Rebecca Avery, Education Safeguarding Advisor (Online Protection):
 - Ashley Assiter, Online Safety Development Officer
 - 03000 415797
 - esafetyofficer@kent.gov.uk (non-urgent issues only)
 - **Contact details for the LADO**
 - Telephone: 03000 410888
 - Email: kentchildrenslado@kent.gov.uk
 - **Childrens Social Work Services**
 - Integrated Front Door: 03000 411111
 - Out of Hours Number: 03000 419191
 - **Kent Police**
 - 101 (or 999 if there is an immediate risk of harm)
 - **Kent Safeguarding Children Board (KSCB)**
 - kscb@kent.gov.uk

35. National Support

Support for staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Pupils

- NSPCC: www.nspcc.org.uk
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk

Support for adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- Kidscape: www.kidscape.org.uk
- The Samaritans: www.samaritans.org
- Mind: www.mind.org.uk
- NAPAC (National Association for People Abused in Childhood): napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk

Domestic Abuse

- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadvice.org.uk
- Mankind: www.mankindcounselling.org.uk

Honour based Violence

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>

Sexual Abuse and CSE

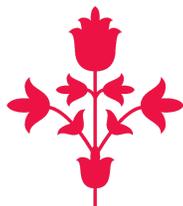
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- CEOP: www.ceop.police.uk
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk

Online Safety

- Childnet International: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Parents Info: www.parentinfo.org
- Internet Matters: www.internetmatters.org
- Net Aware: www.net-aware.org.uk
- ParentPort: www.parentport.org.uk
- Get safe Online: www.getsafeonline.org

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk



Earlscliffe

**COVID-19 school closure arrangements
for Safeguarding and Child Protection
at Earlscliffe**

Date: 31st March 2020 / 16th April 2020 / 26th August 2020 / 14th September 2020 / 24th September 2020

Date shared with staff: 20th April 2020; August 2020; September 2020

Key contacts at Earlscliffe –

Role Name	Contact Number	Email
Designated Safeguarding Lead – Holly Goodwin	01303 253951 ext 355/525 (mobile)	hollygoodwin@earlscliffe.co.uk
Deputy Designated Safeguarding Leads – Joss Williams	01303 253951 ext 340/040	josswilliams@earlscliffe.co.uk
Head Teacher – Joss Williams	01303 253951 ext 340/040	josswilliams@earlscliffe.co.uk
Dukes Education Compliance – Paul Ludlow	07584 012130	paul.ludlow@dukeseducation.com
Chair of Governors – Aatif Hassan	07956 665988	aatif.hassan@dukeseducation.com
Safeguarding Governor – Tim Fish	07803 935385	tim.fish@dukeseducation.com

1. Context

From 20th March 2020 parents were asked to keep their children at home, wherever possible, and for colleges to remain open only for those children of workers critical to the COVID-19 response - who absolutely need to attend. Colleges and all childcare providers were asked to provide care for a limited number of children - children who are vulnerable, and children whose parents are critical to the COVID-19 response and cannot be safely cared for at home.

At Earlscliffe, care is provided for those vulnerable children and young people who are boarders and unable to return home immediately to their home countries.

This addendum of the Earlscliffe Safeguarding and Child Protection policy contains details of our individual safeguarding arrangements in the following areas:

Vulnerable children

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with education, health and care (EHC) plans. Those who have a social worker include children who have a Child Protection Plan and those who are looked after by the Local Authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

Those with an EHC plan will be risk-assessed in consultation with the Local Authority and parents, to decide whether they need to continue to be offered a college or college place in order to meet their needs, or whether they can safely have their needs met at home. This could include, if necessary, carers, therapists or clinicians visiting the home to provide any essential services. Many children and young people with EHC plans can safely remain at home.

Senior leaders, especially the Designated Safeguarding Lead (and deputy) know who our most vulnerable children are. They have the flexibility to offer a place to those on the edge of receiving children's social care support.

Earlscliffe will continue to work with and support children's social workers to help protect vulnerable children. This includes working with and supporting children's social workers and the local authority virtual college head (VSH) for looked-after and previously looked-after children. The lead person for this will be the DSL.

There is an expectation that vulnerable children who have a social worker will attend an education setting, so long as they do not have underlying health conditions that put them at risk. In circumstances where a parent does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and Earlscliffe will explore the reasons for this directly with the parent.

Where parents are concerned about the risk of the child contracting COVID19, Earlscliffe or the social worker will talk through these anxieties with the parent / carer following the advice set out by Public Health England.

Earlscliffe will encourage vulnerable children and young people to attend a college, including remotely if needed.

Attendance monitoring

Local authorities and education settings do not need to complete their usual day-to-day attendance processes to follow up on non-attendance.

Earlscliffe and social workers will agree with parents / carers whether children in need should be attending college – college name will then follow up on any pupil that they were expecting to attend, who does not. Earlscliffe will also follow up with any parent or carer who has arranged care for their child(ren) and the child(ren) subsequently do not attend.

To support the above, Earlscliffe will, when communicating with parents/carers and carers, confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available.

In all circumstances where a vulnerable child does not take up their place at college, or discontinues, Earlscliffe will notify their social worker.

Designated Safeguarding Lead

Earlscliffe has a Designated Safeguarding Lead (DSL) and Deputy DSLs.

The Designated Safeguarding Lead is Holly Goodwin, Head of Pastoral Care & Boarding.

The Deputy Designated Safeguarding Lead is Joss Williams, Head Teacher

The optimal scenario is to have a trained DSL (or deputy) available on site. Where this is not the case a trained DSL (or deputy) will be available to be contacted via phone or online video - for example when working from home.

Where a trained DSL (or deputy) is not on site, in addition to the above, a senior leader will assume responsibility for coordinating safeguarding on site.

This might include updating and managing access to child protection online management system, CPOMS and liaising with the offsite DSL (or deputy) and as required liaising with children's social workers where they require access to children in need and / or to carry out statutory assessments at the college.

It is important that all Earlscliffe staff and volunteers have access to a trained DSL (or deputy). On each day staff on site will be made aware of that person is and how to speak to them.

The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely.

Reporting a concern

Where staff have a concern about a child, they should continue to follow the process outlined in the college Safeguarding Policy: this includes making a report via CPOMS, which can be done remotely.

In the unlikely event that a member of staff cannot access their CPOMS from home, they should email the Designated Safeguarding Lead, Head Teacher and the Chair of Governors. This will ensure that the concern is received.

Staff are reminded of the need to report any concern immediately and without delay.

Where staff are concerned about an adult working with children in the college, they should report the concern to the Head Teacher. If there is a requirement to make a notification to the Head Teacher whilst away from college, this should be done verbally and followed up with an email to the Head Teacher.

Concerns about the Head Teacher should be directed to the Chair of Governors, Aatif Hassan, or the Safeguarding Governor, Tim Fish.

Safeguarding Training and induction

DSL training is very unlikely to take place whilst there remains a threat of the COVID 19 virus.

For the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training. An Educare module can be completed as interim training [DSLs should contact Lisa Maynard at Dukes Education for this to be added to individual staff member accounts. lisa.maynard@dukeseducation.com].

All existing college staff have had safeguarding training and have read part 1 of Keeping Children Safe in Education (2019). The DSL should communicate with staff any new local arrangements, so they know what to do if they are worried about a child.

Where new staff are recruited, or new volunteers to Earlscliffe, they will continue to be provided with a safeguarding induction and should complete the Educare online safeguarding module relevant to the setting.

For movement within the Dukes Education group, colleges should seek assurance from the college that the member of staff has received appropriate safeguarding training.

Upon arrival, they will be given a copy of the receiving setting's child protection policy, confirmation of local processes and confirmation of DSL arrangements.

Safer recruitment / volunteers and movement of staff

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, Earlscliffe will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of [Keeping Children Safe in Education \(2021\)](#) (KCSIE).

In response to COVID-19, the [Disclosure and Barring Service \(DBS\)](#) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

Where Earlscliffe are utilising volunteers, we will continue to follow the checking and risk assessment process as set out in paragraphs 167 to 172 of KCSIE. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

Earlscliffe will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found at paragraph 163 of KCSIE.

Earlscliffe will continue to consider and make referrals to the [Teaching Regulation Agency](#) (TRA) as per paragraph 166 of KCSIE and the TRA's '[Teacher misconduct advice for making a referral](#)'.

During the COVID-19 period all referrals should be made by emailing Misconduct.Teacher@education.gov.uk

Whilst acknowledging the challenge of the current national emergency, it is essential from a safeguarding perspective that any college is aware, on any given day, which staff / volunteers will be in the college, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, Earlscliffe will continue to keep the single central record (SCR) up to date as outlined in paragraphs 148 to 156 in KCSIE.

Online safety in colleges

Earlscliffe will continue to provide a safe environment, including online. This includes the use of an online filtering system.

Where students are using computers in college, appropriate supervision will be in place.

Children and online safety away from college

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Child Protection Policy and where appropriate referrals should still be made to children's social care and as required, the police.

Online teaching should follow the same principles as set out in the College's [code of conduct](#).

Earlscliffe will ensure any use of online learning tools and systems is in line with privacy and data protection / GDPR requirements.

Earlscliffe staff and students have been issued with specific guidelines concerning online and virtual contact during the period of school closure when 'Earlscliffe Online' lessons are delivered virtually.

Below are some things to consider when delivering online lessons, especially where webcams are involved:

- No one-on-ones; groups only.
- Staff and students must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be blurred where possible.
- The live class should be recorded so that if any issues were to arise, the video can be reviewed.

- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day.
- Language must be professional and appropriate, including any family members in the background.
- Staff must only use Skype, Google Classroom, Zoom or Microsoft Teams to communicate live with students.
- Staff should record, the length, time, date and attendance of any sessions held.

Supporting children not in college

Earlscliffe is committed to ensuring the safety and wellbeing of all its Children and Young people.

Where the DSL has identified a child to be on the edge of social care support, or who would normally receive pastoral-type support in college, they should ensure that a robust communication plan is in place for that child or young person. Details of this plan must be recorded on CPOMS, as should a record of contact have made.

The communication plans can include; remote contact, phone contact, door-step visits. Other individualised contact methods should be considered and recorded.

Earlscliffe and its DSL will work closely with all stakeholders to maximise the effectiveness of any communication plan.

This plan must be reviewed regularly (at least once a fortnight) and where concerns arise, the DSL will consider any referrals as appropriate.

The college will share safeguarding messages on its website and social media pages.

Earlscliffe recognises that college is a protective factor for children and young people, and the current circumstances, can affect the mental health of pupils and their parents/carers. Teachers at Earlscliffe need to be aware of this in setting expectations of pupils' work where they are at home.

Earlscliffe will ensure that if the school cares for children of critical workers and vulnerable children on site, we ensure appropriate support is in place for them. This will be bespoke to each child and recorded on CPOMS.

Supporting children in college

Earlscliffe is committed to ensuring the safety and wellbeing of all its students.

Earlscliffe will continue to be a safe space for all children to attend and flourish.

The Head Teacher will ensure that appropriate staff are on site and staff to pupil ratio numbers are appropriate, to maximise safety.

Earlscliffe will refer to the Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID19.

Earlscliffe will ensure that where we care for children of critical workers and vulnerable children on site, we ensure appropriate support is in place for them. This will be bespoke to each child and will be recorded on CPOMS.

Where Earlscliffe has concerns about the impact of staff absence – such as our Designated Safeguarding Lead or first aiders – will discuss them immediately with the chairman.

Peer on Peer Abuse

Earlscliffe recognises that during the closure a revised process may be required for managing any report of such abuse and supporting victims.

Where a college receives a report of peer on peer abuse, they will follow the principles as set out in part 5 of KCSIE and of those outlined within of the Child Protection Policy.

The college will listen and work with the young person, parents/carers and any multi agency partner required to ensure the safety and security of that young person.

Concerns and actions must be recorded on CPOMS and appropriate referrals made.

Support from Dukes Education

Dukes Education Compliance Director and Chair will provide support and guidance as appropriate to enable the DSL to carry out their role effectively.

This includes remotely accessing Child Protection files for the purpose of quality assurance, support, guidance and direction.

Dukes Education will also provide regular group and individual supervision sessions. This may take the form of an online meeting.

Reviewed & edited 16th April 2020, 26th August 2020, 14th September 2020, 24th September, JCH, August 2021 HG