Safeguarding Policy

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Policy Statement

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education (2026) as:

- '*Providing help and support to meet the needs of children as soon as problems emerge;*
- *Protecting children from maltreatment, whether that is within or outside the home, including online;*
- *Preventing the 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.*'

Hurstpierpoint College is committed to ensuring that the safeguarding of pupils and promotion of their welfare, as stated in Section 175 of the Education Act (2002), is one that is central to the College's ethos, policies, and the actions of all staff. All children are deserving of the highest levels of care and safeguarding, regardless of their individual characteristics or circumstances, and the College is committed to applying this policy to ensure effective levels of safeguarding and care are afforded to all pupils. It is essential that all actions are taken first and foremost in the best interest of pupils. This policy sets out guidance and procedures that Hurstpierpoint College will follow to ensure appropriate action is taken in a timely manner to safeguard and promote the welfare of pupils. The contents of this policy are intended to be in accordance with all relevant Government guidelines and legislation such as KCSIE 26 and Working Together to Safeguard Children, as well as the inter-agency procedures provided by local safeguarding partners. The College operates with a culture of "it could happen here" and recognises safeguarding as everyone's responsibility.

The intent of the policy is to promote a culture where:

- Children are listened to and taken seriously
- Children's views and experiences are considered and promoted as part of the College development plan and policy review
- Staff maintain professional curiosity and are reflective in their practice
- Concerns are reported and acted on promptly
- Concerns about staff conduct are noticed, reported, recorded and reviewed

The College is committed to an inclusive, anti-discriminatory safeguarding culture. Staff recognise that children may experience harm differently based on factors such as race, gender, disability, and social context.

Staff are expected to:
- identify and challenge discrimination, including racism;
- understand how bias and disproportionality may impact safeguarding decisions; and
- ensure that all children receive equitable protection and support.

Safeguarding practice at the College reflects an awareness that children may experience multiple and intersecting vulnerabilities. Staff, the safeguarding team and senior leaders take an approach of reflective practice, professional curiosity and learning from patterns.

This policy applies to Hurstpierpoint College which includes the EYFS setting with the reception class. This policy is reviewed and updated at least annually and is available on the College website.

This policy is designed to meet the College's obligations under the Education (Independent School Standards) Regulations 2014 ("ISSRs"), the National Minimum Standards for Boarding Schools 2022, and the 2025 Statutory Framework for the Early Years Foundation Stage. All of these require schools to have arrangements in place to safeguard and promote the welfare of children in the school.

Paragraphs 7 and 8 of the ISSRs state that arrangements to safeguard and promote the welfare of pupils at the school (including boarders where applicable) must have regard to any guidance issued by the Secretary of State. The Department for Education ("DfE") guidance to which schools must have regard to is:

- *Keeping Children Safe in Education* (September 2026) ("*KCSIE*")
    - *KCSIE incorporates the additional statutory guidance Disqualification under the Childcare Act 2006 (September 2018)*
    - *KCSIE also provides links to various toolkits and additional advice and support*
- Early years foundation stage statutory framework for group and school-based providers 2026
- *Working Together to Safeguard Children* (2026) ("*WT*")
- Information Sharing Duty Statutory guidance for safeguarding organisations and their practitioners 2026
- *Prevent Duty Guidance: for England and Wales* (2023) ("*Prevent*"). *Prevent* is supplemented by non-statutory advice and a briefing note:
    - The Prevent duty: an introduction for those with safeguarding responsibilities
    - *The use of social media for on-line radicalisation* (July 2015)
- *Relationships education, relationships, and sex education (RSE) and health education* (September 2025).
- The Charity Commission guidance *Safeguarding and protecting people for charities and trustees* (June 2022)
- *National Minimum Boarding Standards (Sept 2022)*
- *Working together to improve school attendance (2024)*
- *Restrictive interventions, including use of reasonable force, in schools (April 2026)*
- *Searching, Screening and Confiscation (2022)*
- *Duty on police forces in England and Wales to notify education establishments of domestic abuse incidents: Operation Encompass (2025)*
- *Sharing nudes and semi-nudes: how to respond to an incident (overview) (updated March 2024) - GOV.UK*

This policy also takes into account the procedures and practice of West Sussex County Council as part of the inter-agency safeguarding procedures set up by the West Sussex Safeguarding Children Partnership.)

This policy is to be read and understood in conjunction with the following policies (but not limited to):

- Attendance, Registration and Absence Policy (which includes procedures for Children who go missing from site and Children Missing in Education)
- Behaviour
- Anti-bullying
- Online Safety, IT and use of AI
- Whistleblowing
- Intimate care
- First aid
- Medical
- Staff Code of Conduct
- Safer Recruitment

- Lettings Procedures
- Mental Health
- PSHCE/RHSE

Copies of these policies are available on the College's website or as requested from the College reception.

Implementation

This policy applies to all adults at the College, including teaching and support staff employees, contractors, volunteers, including Governors, and visitors. It will be publicly available on the College's website and will be available in paper form upon request from the College Reception. The College will also make available and/or signpost all relevant legislation, statutory and non-statutory safeguarding and child protection guidance, and relevant College policies to staff, contractors and volunteers for their reference.

The implementation of this policy will be reviewed on a regular basis by the Senior Management Team and by Governors, led by the named Safeguarding Governor, to assess the effectiveness and impact of the College's processes and procedures in safeguarding pupils and promoting their welfare. Failure by any staff member or volunteer to implement this policy could be considered an act of misconduct and will be dealt with in line with relevant HR policies. Any concerns about compliance with this policy should be raised as a concern to the Head of Safeguarding in the first instance.

Role and Responsibilities

- **Pupils will:** adhere to College rules regarding conduct and safe behaviour; report anything that worries them to a trusted adult.
- **Parents/carers will:** work collaboratively with College staff to promote the safety of their children and of other pupils, including at home, in the community and online; support the College to teach pupils about keeping safe by reinforcing key safety messages; report any safeguarding concerns regarding their own children or another pupil to the College. Parents are encouraged to raise any concerns directly with the College, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. If it is felt necessary to raise concerns about safeguarding practice, this can be via the College's Parental Complaints Procedure. If a resolution is not found, parents may wish to contact the Independent Schools Inspectorate (contact details found in Annex A).
- **The College, SMT and Head of Safeguarding will:** ensure that practice is in line with statutory expectations and strive for best practice; ensure all pupils have a safe learning environment and are taught about how to keep safe; train and support all adults involved with the College to appropriately identify and respond to any pupil at risk of harm; work collaboratively with parents and professional agencies to safeguard pupils. The named member of senior leadership team responsible for filtering and monitoring is: Caty Jacques.
- **Governors will:** ensure this policy is applied robustly throughout the College; review it on an annual basis to ensure the effectiveness and rigour of safeguarding practice. Provide strategic safeguarding oversight through reviewing and analysing termly reports to the safeguarding committee. Review whether practice is effective through assessing audits and completing quality assurance checks on such as: check filtering and monitoring effectiveness, ensuring record keeping is well maintained, checking safer recruitment practices. The named governor responsible for filtering and monitoring is: Fran Hampton.
- **All staff will:** take responsibility for the safeguarding of pupils regardless of whether the concern about the child arises on site, at home, in the community or online and report concerns they

have in a timely manner. Details of how to report concerns about children or adults are found in Annex C of this policy.

- To keep themselves and children safe, staff will adhere to the Staff Code of Conduct, found in the Staff Handbook, the parameters in the Online Safety Policy and follow all other relevant policies as required by the College.
- Staff must remain alert to emerging safeguarding risks (including AI, deepfakes, misinformation and online harms) and take opportunities to educate children on these topics. Staff must proactively engage in the filtering and monitoring of online harms.
- Staff are trained to identify vulnerable pupils and pay particular attention to:
  - Children with a social worker
  - Currently or previously looked after children
  - Young Carers
  - SEND pupils
  - Persistently absent pupils
  - Children with medical conditions
  - Those whose behaviour causes concern
  - Children who are struggling with their mental health, specifically low mood, self-harm, suicidal ideation/attempt or disordered eating
  - Children who have a family member in prison
- Staff are expected to take responsibility for their own learning around safeguarding, including reading this policy, the other policies and procedures outlined in the above Policy Statement, KCSIE part 1 and Annex B, regular training and updates provided by the College safeguarding team.

Designated and Deputy Safeguarding Leads

The Designated Safeguarding Lead (DSL) has overall responsibility for Safeguarding throughout the College and works closely with the Head of Safeguarding. The Designated Safeguarding Lead will defer day to day responsibilities as appropriate to the Head of Safeguarding and the rest of the safeguarding team; who are Deputy Designated Safeguarding Leads (DDSL).

- The Designated Safeguarding Lead and Head of Safeguarding will coordinate all safeguarding and child protection procedures at the College, including those related to online safety, filtering, and monitoring, and will take lead responsibility for this area.
- The College has a number of DDSLs, who are trained to the same level as the DSL.
- During College hours, the DSL and DDSLs will be available to discuss any safeguarding concerns, either in person or via phone, e-mail and Teams, or other relevant modes of communication. The Designated Safeguarding Lead and Head of Safeguarding will make appropriate cover arrangements for any requirements or activities taking place out of College hours and during school holidays. In the event that the DSL is absent, the Head of College will arrange for suitable cover from the Deputy Designated Safeguarding Lead(s);
- The DSL and DDSLs undergo suitable training, including related to specific areas such as online safety and Prevent, to equip them with the skills and knowledge required to undertake their role, which will be updated at a minimum every two years; in addition, their skills and knowledge are refreshed at regular intervals, annually at a minimum. They will take responsibility for keeping up to date with latest statutory expectations and implementing them into practice.
- The DSL and DDSLs encourage amongst staff a culture of listening to children and taking into account their wishes and feelings to help protect them. This includes understanding that children may not recognise that they are being abused, neglected or exploited, or feel ready to share this,

and the importance of staff remaining professionally curious and seeking to build trusting relationships with children that facilitate communication. Pupil voice is valued, and the College will take every opportunity to hear from children, at an age-appropriate level, about their views and experiences, in order to inform practice and decision making.

- The DSL and DDSLs receive, consider, review and react to a range of concerns made about pupils or safeguarding concerns on site, online, at home or in the community. This will be within the context of any history of concerns and other aspects of College life. Some of these concerns will be delegated for action to various other staff who may have a more relevant relationship to the pupil/their family. This includes, the House teams, medical staff, teachers, learning support, behaviour, and year group leads. These staff members are expected to quickly respond to the request and promptly write this up on CPOMS.
- The DSL and DDSL will maintain an up-to-date list of pupils of concern. This will consider vulnerable pupils and pay particular attention to:
    - Children with a social worker
    - Currently or previously looked after children
    - Young Carers
    - SEND pupils
    - Children with medical conditions
    - Persistently absent pupils
    - Those whose behaviour causes concern
    - Children who are struggling with their mental health, specifically low mood, self-harm, suicidal ideation/attempt or disordered eating
    - Children who have a family member in prison

  This list of children will be reviewed weekly by the safeguarding team to assess risk, review latest concerns, decide actions and review previous actions.
- The DSL and DDSLs will oversee that actions are added to concerns raised on CPOMS. This aims to evidence what has been done about the concern, explain the rationale for why and how the concern was followed up and how the concern was resolved.
- The DSL and DDSLs will ensure that all staff know and understand the safeguarding and child protection procedures, as well as knowing, and working effectively with, the local inter-agency procedures for assessment of Family Help and for referrals of suspected cases of abuse, neglect or exploitation.
- The DSL and DDSLs are expected to oversee and manage all referrals of suspected abuse, neglect or exploitation that are made to Social Care, Police, Channel, and other agencies, and will also support and liaise with any College staff who have either been involved in making such referrals or who have concerns about a pupil which may subsequently require a referral. All referrals will be followed up within one working day of them being submitted, if the College has not received feedback from the agency to whom the referral was made.
- The DSL and DDSLs routinely discuss and review concerns about children and families to provide peer case supervision.
- The DSL and DDSLs may act as an Appropriate Adult where required, in line with Police Code, or designate an appropriate staff member to do so, under their explicit guidance and oversight. Any searching, screening or confiscation will take place in line with updated DfE guidance (2022).
- The DSL and DDSLs maintain detailed and secure records on the College's electronic system of any concerns and referrals (CPOMS), and all subsequent follow up actions and communications. Records will be actioned and updated within one working day of the event taking place
- The DSL and DDSLs work closely with other agencies to safeguard children and share information, this could be through assessments and multi-agency plans, as outlined in Working Together to Safeguard Children.

Induction, training and updates

Induction and training are in line with advice from the three safeguarding partners.

Staff

Policy -

At the beginning of the academic year, staff are required to sign to confirm they have read, understood and will abide by relevant policies:

All staff who do not work directly with pupils:

- Child Protection and Safeguarding Policy
- Staff Code of Conduct,
- Whistleblowing Policy,
- Part One - Keeping Children Safe in Education (2026)

All staff who work directly with pupils will read the above policies and the following:

- Allergen Management,
- Anti-bullying Policy,
- Behaviour Policy,
- Attendance, Registration and Absence Policy (which includes procedures for Children who go missing from site and Children Missing in Education)
- Online Safety Policy,
- Social Media Policy,

Staff who work with EYFS, also read:

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

Volunteers, Contractors (who work with children) and Residents

- Child Protection and Safeguarding Policy
- Part One - Keeping Children Safe in Education (2026)

Contractors will be asked to read relevant policies depending on the type of work they are doing in the College.

Governors:

- Child Protection and Safeguarding Policy
- Part One and Part Two - Keeping Children Safe in Education (2026)

Any new staff, contractors and volunteers who join the College subsequently to the annual policy issue, will receive a specific safeguarding induction where the documentation listed in the previous paragraph, will be shared.

In addition, temporary and short-term visitors to the College will be made aware of the College's safeguarding procedures in line with the College's visitors procedure, found in the Reception Policy. They will also be given a copy of the Visitors Safeguarding Leaflet.

Training and updates:

Staff, Residents, Contractors and Volunteers

All ‘staff’ (including contractors and volunteers who are working with children directly) are expected to take responsibility to engage in training, updates to policy changes, Staff INSET and by e-mail with safeguarding bulletins.

Training and updates include:

- Receive training in safeguarding and child protection regularly, in line with advice from the local safeguarding partners. Training will include:
    - What safeguarding is and our responsibility (including role in attendance)
    - Legislation and Policy
    - How our values affect assessment of risk
    - Understanding key safeguarding risks
    - Spotting different types of harm/abuse
    - Responding to a disclosure
    - How to share concerns
    - Effective record keeping
    - Safe Culture
- Update training includes topics such as:
    - Online safety
    - Harmful sexual behaviours (including child on child sexual violence and harassment),
    - Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas;
    - How to refer children and young people for further help.
    - Update training starting from 2026 includes:
        - What is effective safeguarding
        - Our role in this
        - Contextual safeguarding risks
        - Low Level Concerns vs Allegations
        - Reporting concerns
        - Linking with external services
        - Understanding thresholds
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The College provides these via, for example, emails, e-bulletins, and staff meetings.
- Assessment is made about the role of the individual to determine the type, length and frequency of the training provided.
- Quizzes and surveys for staff help to determine knowledge areas and training needs.
- Mental Health First Aid training is offered for all staff to complete

EYFS staff have training compliant with Annex C of the Early years foundation stage statutory framework 2026.

Staff; residents; contractors; and volunteers, who are working unsupervised on site, but not directly with children also receive safeguarding training and updates. This provision is assessed as per the type of work they are completing.

Governors

All governors of Hurstpierpoint College will receive appropriate safeguarding and child protection (including online safety) training through the Hurst Safeguarding Training and, in addition, they

complete governor specific online safeguarding training. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the College are effective and support the delivery of a robust whole College approach to safeguarding. Their training should be regularly updated.

Governors of Hurstpierpoint College are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the College to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention.

DSL and Head of Safeguarding

The DSL and Head of Safeguarding receive updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the safeguarding partners' approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of *KCSIE.*

In addition to their formal training, the DSL and Head of Safeguarding's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. In particular, the College will support the DSL and Head of Safeguarding in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

The Deputy DSL (DDSL)s are trained to the same level as the DSL.

Specific Safeguarding Issues

- The College recognises that adults working at the College are in a unique position to recognise and respond to signs of abuse, neglect or exploitation, children who are vulnerable and that these can take place and manifest in a variety of ways, including abuse that takes place online, and abuse that takes place between children.
- Induction training, regular refresher sessions and ongoing updates will equip staff, contractors and volunteers to understand the different types of abuse, including specific safeguarding issues and support them to know how to respond to any concerns.
- Annex B to this document, gives more details about safeguarding risks whereas this section outlines prevalent risks for our community. Annex C outlines how staff share the concern.

Contextual Safeguarding

- Children are subject to possible risk at home, at school, in their local community and environment, and online, and the College recognises that, in order to effectively safeguard pupils and promote their welfare, there is a need to understand any specific issues arising in the local area that can affect the risk posed to them.
- The College will work with local partners, including Social Care and Police, to ensure that there is a continuing alertness to any emerging contextual risks, and to ensure that assessment of risk for any pupils includes appropriate reference to their local community and environment.

- The College regularly reflects on the needs of the College community, conduct pupil voice activities, and uses data to understand key trends and themes. This helps the College to educate staff, children, and parent/carers on key issues.

Online Safety

(Further information can be found in the Online Safety Policy)

The College has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the College's IT system, via a filtering system called Smoothwall.

The College ensures that filtering and monitoring systems are:

- effective in practice and regularly tested;
- understood by the DSL, safeguarding team, senior leaders and relevant staff; and
- subject to formal review at least annually
- pupils understand that the system is there to help keep them safe

The College will assess and mitigate emerging risks, including those associated with generative artificial intelligence (AI), to ensure systems remain effective.

This includes the use of College devices when they are not connected to the College's network. This aims to reduce the risk of children which is summarised by the 4 c's:

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,

contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,

conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams, including sextortion.

Daily checks are made during term time of any alerts on the Smoothwall system, indicating a concern about a website or web search. The safeguarding team reviews these concerns, assesses them, and decides if further action is needed (e.g. conversation with child, parents, investigation, review of internet safety filters).

The College recognises however that many children have unlimited and unrestricted access to the internet via their mobile phones, which means that children may consensually and/or non-consensually share indecent images (nudes and semi-nudes), be an instigator of, or victim of, deepfakes and AI manipulation, sexually harass their peers (and be sexually harassed) via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected.

We recognise pupils might have access to harmful online content on a device they have brought into the school, and harmful content that may already be downloaded on to them, and there is opportunity

to download harmful content via 3,4 and 5G that will bypass the school's filtering and monitoring systems. This is an ongoing challenge through the use of VPNs. The following is in place to reduce the risk of harm:

- VPNs are banned and pupils caught using one will receive a behaviour sanction
- PSHCE lessons explore the harm of showing peers extreme content online
- The 4g/5g network is weak in the local area
- Smoothwall will still pick up on sites accessed and investigations can still identify devices
- Pupils are informed about Smoothwall and why it protects them
- Pupils up until the Lower Sixth, do not have their personal phone on them during the school day.
- Boarders have access to their phones for limited time slots in the evenings

The Big 12 covers this:
6. Any form of sexual activity between pupils of any age. Possession, or sharing, of pornographic material including in electronic form on mobile device, iPad etc. Generating, sending, wilfully possessing, requesting or sharing any nude or semi-nude images.
10. Offensive, threatening or sexually inappropriate behaviour towards others, whether staff or pupils, by physical, verbal, written or electronic means.
12. Bringing the College, its staff or pupils into disrepute or danger through poor behaviour at any time or via any media including the internet, or by breaking the appropriate use of the School Network Policy.

Online Safety Policy and Education

Online safety (including when children are online at home) is included in the College's ICT curriculum, PSHCE curriculum, assemblies, and ad hoc focus sessions.

The College will liaise with parents to reinforce the importance of children being safe online and the systems the College uses to filter and monitor online use.

Further detail of the College's policy and procedures in relation to online safety can be found in the College's Online Safety Policy and IT Policy, and these also includes detail on the use of mobile and smart technology the College, including the College's management of the associated risks, and the IT arrangements in place at the College to ensure strong cyber security, that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the College systems. The PSHCE Policy also outlines the education children receive about Online Safety and risks of AI. This behaviour can be harmful regardless of whether it is perceived as consensual and must be treated seriously by staff. The Big 12, Behaviour Policy, includes:

6. Any form of sexual activity between pupils of any age. Possession, or sharing of, pornographic material including in electronic form on a mobile device, iPad etc. Generating, sending, wilfully possessing, requesting or sharing any nude or semi-nude images, including those generated by AI
7. Any form of bullying (including race, religious, disability, sexuality, learning differences or gender offences) by any means, including cyber bullying (internet, mobile phones etc)
10. Offensive, threatening or sexually inappropriate behaviour towards others, whether staff or pupils, by physical, verbal, written or electronic means
12. Bringing the College, its staff or pupils into disrepute or danger through poor behaviour at any time or via any media including the internet, or by breaking the appropriate use of the School Network Policy

Mental Health

The College recognises that mental health problems can be an indicator of a safeguarding concern and staff need to apply professional curiosity to consider whether a child has suffered or is at risk of suffering abuse, neglect or exploitation and, equally, that having experienced abuse or neglect can significantly impact on a child's mental health. College staff, through their regular day to day contact with pupils, are well placed to observe their behaviours and to identify any concerns relating to a pupil's mental health. Where a staff member has a concern about the mental health of a pupil that also reflects a safeguarding concern, this will be reported and responded to.

A child may present in a way that indicates they are at immediate risk of harm due to their mental health; this will be considered as a safeguarding concern which requires immediate action and longer-term support. Examples include:

- Self-harm
- Suicidal ideation
- Suicide attempt
- Significant disordered eating
- Psychosis
- A child going missing under distress

If the above concerns are presented, Staff must respond proportionately and without delay. If a child is believed to be at immediate risk of harm, staff must take urgent action, including:

- contacting emergency services (999),
- seeking immediate medical attention (e.g. A&E),
- inform parents of the child
- informing the DSL or DDSL as soon as possible.

The safeguarding team will treat these incidents as any other safeguarding concern through responding, recording and reviewing the incident and further support.

Staff are aware to report lower-level concerns when a child is struggling so proactive early intervention and referrals to support services via the GP, CAMHS or Family Help are considered. The Head of Mental Health, Head of Safeguarding, Designated Safeguarding Lead or their Deputy will work collaboratively with all relevant staff, i.e. the College's SENDCO, to contribute to any assessment of a pupil's mental health, and will work in collaboration with other agencies, as required, to best meet the pupil's needs and ensure their safety is considered as a primary focus. A risk assessment may be implemented at the discretion of the College to cover risk of harm to the child, to other children and the wider community. It may be that measures include a reduced timetable, medical suspension of some aspects of College life e.g. boarding or sport, regular bag searches and support available for the child.

For further information, see the College's Mental Health Policy.

The College contracts a school counselling service called Place2Be. A child can be referred to for short term intervention or a child can attend the drop in lunchtime service (unless a child has been withdrawn from this option). The safeguarding team will assess the competency of children being able to make their own decisions about provision for their mental health care. See Place2be policy for further details: Safeguarding policy | Place2Be

Child on Child Abuse

Child on child abuse is abuse by one or more children against another child. It can be standalone, or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways, most likely to include but not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying),
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice based incidents, abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse'),
- 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),
- serious physical assault and harm, or the threat of harm with a weapon,
- sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence),
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse, • causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,
- consensual and non-consensual making or sharing of nudes and semi nudes,
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

These arrangements apply to all reports and concerns of child-on-child abuse, whether they have happened in the College or outside of it, and/or online. Abuse that occurs online or outside of the College should not be downplayed and should be treated equally seriously.

- Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future.
- The College takes a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys". Staff will also challenge, through the behaviour policy, physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Staff are not to dismiss or tolerating such behaviours as this risks normalising them.
- The College recognises that misogyny, misandry and harmful gender-based attitudes can underpin harmful sexual behaviour, sexual harassment and abuse. These behaviours may be influenced by online content and peer group dynamics.
- Staff will actively challenge gender based prejudice, violence against women and girls, sexist attitudes and behaviour. The College takes a strong approach to counter their normalisation. Addressing these behaviours is a key part of safeguarding and promoting a safe culture.
- All staff recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination.
- Staff recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety.

- Staff are alert to the signs and impact of prejudice based harm and will report indicators of harm to the safeguarding and/or behaviour teams.
- PSHCE lessons educate pupils on topics such as healthy relationships, sexual assault, consent, anti-bullying and gendered violence.
- The College acknowledges that even if there have been no reported cases of child on child abuse in relation to pupils within the College, such abuse may still be taking place and is simply not being reported. The College will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the College will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.
- The College recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The College also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the College's policy and procedures with regards to child on child abuse, and can recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports.
- The College recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.
- The College recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. The College will consider extra pastoral support for those children through the SEND Coordinator / SENCO.
- The College also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.
- The College recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse. The College will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding at all times.
- The College also recognises that cases are often not clear cut as ‘victim’ and ‘perpetrator’, this incident might indicate that all those involved are, in some ways, victims as the behaviour displayed could be as a result of other abuse. Duty of care for welfare will be given to all parties involved while still properly investigating and managing the risk of the incident.

The College takes the following steps to minimise the risk of child on child abuse.

- Where an issue of pupil behaviour or bullying gives ‘reasonable cause to suspect that a child is suffering, or is likely to suffer, harm’, staff should follow the procedures below rather than the College’s Anti-Bullying and Behaviour policies:
- A pupil against whom an allegation of abuse has been made may be suspended from the College during the investigation. The College will take advice from the relevant safeguarding partners on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s). If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the College will ensure that, subject to the advice of the relevant safeguarding partner, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the

College and advice will be sought as necessary from the relevant local authority and/ or the police as appropriate. The College will have regard to the procedures set out in part 5 of *KCSIE* .

- The victim may ask the College not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL or DDSL who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principal that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL or DDSL will balance the victim's wishes against their duty to protect the victim and other children.
- Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the College will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL/DDSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL/DDSL may also decide that the children involved may benefit from early/family help, and may make the necessary referral in accordance with the Sussex Child protection and Safeguarding partnership's referral process.
- The College's approach to sharing nudes and semi-nudes is clear, that it is not allowed, covered by the behaviour policy and the online safety policy.
- The College will follow the Government "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (March 2024) when responding to an allegation that nudes and/or semi-nudes have been shared.
- In the event of disclosures about child on child abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by a designated and trained member of staff and support from external agencies will be sought, as appropriate.
- When there has been a report of sexual violence, the DSL/Head of Safeguarding will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:
    - the victim;
    - whether there may have been other victims;
    - the alleged perpetrator(s); and
    - all the other children (and, if appropriate, staff) at the College especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

- Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The College will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them.
- The College will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The College acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL/DDSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure

their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing College premises (including during any before or after school-based activities), and transport. The College will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

- The College will consider intra familial harms and whether any support for siblings is necessary following an incident.
- The College will keep a written record of all concerns, discussions and decisions made.
- The College will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the College's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the College will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head of College will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the College's behaviour policy.

Boarding Provision and Risk for Child on Child Abuse

The College recognises that the unique nature of boarding accommodation poses risk associated with children sharing overnight accommodation. Some pupils may begin to form intimate relationships during their time at school. However, safeguarding remains paramount, particularly within a boarding environment where pupils have increased independence and access to one another outside of the school day.

The College does not permit sexual activity between pupils on site. This is stipulated in the Big 12.

All pupils, including boarders, are explicitly taught:
- the College's expectations regarding appropriate relationships;
- the law relating to consent, including that a child under 13 cannot consent;
- the risks associated with sexual activity, assault, coercion, exploitation and harm; and
- how to seek support and report concerns.

Boarders are regularly reminded of these expectations through induction, house meetings and PSHCE education. Staff maintain appropriate supervision and professional curiosity, particularly during evenings, overnight periods and unstructured time.

Risk reduction of harm:

- Boarding houses are gendered and cannot be accessed by the opposite sex (note – this obviously does not deter same sex relationships)
- St Johns for Upper Sixth has gendered boarding areas and bathrooms
- Staff duty rota patrols external area in the evening
- Extensive CCTV in the corridors and outside space
- 24/7 security on site
- Evening staff stay until after lights out
- Whisper system for anonymous reporting

- Attendance procedures account for missing pupils

Any concerns regarding sexual activity between pupils will be assessed by the DSL, taking a safeguarding-led approach which considers:
- the age and developmental stage of those involved;
- issues of consent, coercion or power imbalance;
- whether behaviour constitutes harmful sexual behaviour; and
- whether the behaviour is considered child on child abuse
- the need for a risk assessment
- the need for external agency involvement.

The safety, wellbeing and dignity of all pupils will be prioritised at all times.

The Big 12 covers this aspect of behaviour management.

Serious Violence

Children can be violent to others through domestic abuse, sexual offences, violence against property and threats of violence. A child engaging in violence may be a victim themselves of exploitation (criminal or sexual), witnessing or experiencing abuse, threats, bullying, indoctrination or be struggling with their mental health. These children need early identification, intervention and support however the risk of harm they pose to others needs to be taken seriously.

All staff must report immediately to the safeguarding team if they have concerns that a child:
- is carrying a weapon,
- has used a weapon, or
- is expressing an intention to use a weapon
- is talking about performing acts of violence to others

The safeguarding team will assess risk, consider the wider context, and take appropriate action, which may include:
- referral to children's social care or the police,
- implementing risk management strategies
- assess sanctions as per the Behaviour Policy
- enacting the right to perform a search to locate objects intended to cause harm
- taking steps to de-escalate peer conflict.

Staff use of reasonable force would be considered in management of active serious violence. For further information, see section in this policy.

The Big 12, Behaviour Policy, includes:
1. possessing, purchasing, using or supplying illegal drugs
2. Possessing, purchasing, using or supplying any sort of offensive weapon, or using any object in threatening or dangerous way, including Lasers.
4. Possessing, purchasing, using or supplying any sort of legalised recreational drug including tobacco, e-cigarettes, vapes, nicotine products, poppers, and "legal highs". Abusing or misusing any legal substance (solvents, glue, etc) to achieve a "drug like" state

7. Any form of bullying (including race, religious, disability, sexuality, learning differences or gender offences) by any means, including cyber bullying (internet, mobile phones etc)

10. Offensive, threatening or sexually inappropriate behaviour towards others, whether staff or pupils, by physical, verbal, written or electronic means

11. Theft, intentional damage, or unauthorised use of (or access to) or taking without permission, property belonging to another person or to the College, including plagiarism or academic dishonesty.
12. Bringing the College, its staff or pupils into disrepute or danger through poor behaviour at any time or via any media including the internet, or by breaking the appropriate use of the School Network Policy

Gender Questioning Children
Please refer to the Transgender, Gender Questioning and Intersex Policy for more information.

The College recognises that some children and young people may question their gender identity. In such cases, the College will adopt a very careful, safeguarding-led approach. Decisions will be made in the best interests of the child, and in consultation with parents, following appropriate risk assessment and consideration of their wellbeing. KCSIE 2026 will be followed with regard to maintaining single sex spaces based on biological sex.

The College will:

- involve parents or carers in the vast majority of cases, unless doing so would place the child at risk of harm;
- avoid making decisions in isolation, ensuring oversight by the DSL and senior leaders;
- consider each case individually, recognising the complexity and sensitivity of such situations; and
- ensure that appropriate support is in place for the child

Safeguarding considerations will always be prioritised when responding to children who are questioning their gender. Support for their wellbeing, mental health and peer dynamics will be considered and implemented along with the views and wishes of the child and family. The College abides by the Equality Act in the Protected Characteristics and educates pupils on playing an active role of the school community values through respect and care for others' lived experiences.

Pupil Voice

All pupils at the College, regardless of their age, have an enormous support network around them. They have a significant number of people to whom they can turn at any time. These include the Chaplain, Teaching staff, Tutors, Coaches, Prefects, Wellbeing Champions, Housemasters and Housemistresses, School Counsellors, Medical centre staff and the DSLs. The pupils also have access to an Independent Listener.

All Pupils have access to share concerns via a secure, anonymous platform called WHISPER. These reports go to the safeguarding team for review and response. A direct link to WHISPER and Childline are on each pupil's Windows Surface.

Near the beginning of each academic year, all pupils are asked to nominate their two 'Go2' members of staff that they would feel comfortable talking to. Pupils are reminded at regular intervals about the support that is available to them. All pupils complete an annual survey which includes questions on their feeling of safety, bullying, abuse and whether they have adults they feel able to talk to within the College environment.

All staff are committed to giving the children the time and space that they need and understand that non-judgemental listening is an important skill to master when working with children. Knowing what to say and when, can make all the difference in the world to a child who is struggling to open up. The College will routinely check in with pupils verbally or may complete an activity with a pupil to help

them open up about their lived experience. This may be a proactive measure or reactive, following a concern raised. Staff have received training in how to ask open questions and not use leading questions. Any concerns raised through pupil voice will be shared with the safeguarding team for review and response. The College will routinely survey to assess their views around safety and wellbeing.

Teaching pupils about safeguarding topics

Please see the PSHCE and RSE Policy for more information

- The College recognises the importance of teaching pupils how to stay safe, and that opportunities to do so form an integral part of a broad and balanced curriculum. Learning opportunities will take the form of: PSHCE lessons (in line with statutory requirements for the Relationships and Heath curriculum and accompanying DfE-recommended resources), Computing lessons, assemblies, circle time, class/form time, and visiting speakers, as well as smaller group and focussed intervention for pupils identified as particularly vulnerable, as needed. The ethos of the College and its curriculum will support the promotion of British Values, which is designed to build resilience to exploitation and radicalisation. The College will model and teach safe behaviour and appropriate language (including how to stay safe online, risks of AI and the College's use of filtering and monitoring) and will promote a culture of safety within the College where everyone's opinion is valued, and everyone has someone safe to whom they can turn. Pupils are taught about healthy relationships including positive online communication, consent, sexual violence and harassment, gender-based prejudice and violence, and how to seek support.
- Pupils are also taught about bullying and prejudice, including racism, faith-based prejudice, and other forms of discrimination. They are taught about the Equality Act and the protected characteristics so as to not be a bystander and report any issues or concerns they have. This will be dealt with through the behaviour policy. It is important that pupils feel that the College takes seriously any concerns that they have. The College will actively collect feedback from pupils and will regularly engage with Pupil Voice to seek the views of pupils on their experiences of feeling safe.
- The College understands that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic, and sexual violence/harassment. The College will have regard to the DfE's statutory guidance Relationships Education, Relationships and Sex Education (RSE) and Health Education when making arrangements for and teaching Relationships Education AND/OR RSE. Relationships Education AND/OR RSE will form part of the College's PSHCE programme including topics of consent. See RSE policy for further information.
- The PSHCE curriculum is created to fulfil statutory expectations, meet the needs of the community through understanding the contextual safeguarding risks and based on pupil/parent voice on their priorities.

Process, Procedures, and inter-agency Liaison.

- Any concern about a child, including possible signs of abuse, neglect or exploitation, is recorded using a standardised safeguarding concerns form on CPOMS (see Annex C). This is explained to all staff and volunteers at induction and refresher training. A paper copy of the College's concern form is also available in the event of being unable to access the online system (see Annex C). These are copied and added to CPOMS. Sometimes e-mail communication is used to share concerns, this is also copied and added to the pupil's CPOMS record. Training and refresher sessions reinforce effective techniques for recording concerns and will highlight the importance of accurate written records.

- All new safeguarding concerns records, and any other documentation of a safeguarding nature, are held in CPOMS, separately from any other pupil information, and are stored securely with access limited to those on a 'need to know' basis. Confidential and sensitive information is logged via certain categories where only members of the safeguarding team have access to. Historic files, and those received from previous settings, may still exist in paper form.
- Pupil safeguarding files on the College's CPOMS system will contain any relevant information and documentation related to the pupil's safety and welfare. The contents will be logically organised and will allow for easy access to key events and information regarding the pupil. Should the pupil leave the College, a copy of their safeguarding file will be transferred to the new school within five working days of the College receiving explicit confirmation of the pupil having started at the new school. Confirmation of receipt of the file will be requested.
- Upon receiving a concern which indicates a suspicion of abuse, neglect or exploitation, the Designated Safeguarding Lead or their Deputy will follow local inter-agency procedures, review local threshold guidance, local information sharing protocols and statutory/legal expectations in deciding if a referral to an external agency is warranted.

Follow the review of the thresholds the next steps could be:

  - managing any support for the child internally via the school or college's own pastoral support processes, including considering where doing so does not place the child at additional risk, whether the designated safeguarding lead (or a deputy) should inform parents or carers to further support the child's wellbeing,
  - undertaking a family help assessment
  - making a referral to statutory services, for example as the child could be in need, is in need or is suffering, or likely to suffer harm.

- It is important to note that whilst a referral would typically be made by the Designated Safeguarding Lead or their Deputy, any member of staff can make a referral, and appropriate information will be signposted to all staff to support them to do so. A telephone consultation or referral for advice, might be made to the relevant Local Authority to discuss the concern and decide the best course of action. It is the duty of the College and is at the College's discretion to share information with relevant external safeguarding partners for the safety and well-being of the child.
- In the case of a referral being made due to risk of significant harm, the referrer will make a detailed written record of their actions, including dates and times of any conversations; the name and role of any professionals that were spoken to; the outcome of the referral; any actions that the referrer and the agency receiving the referral have agreed to.
- Any disagreements between the referrer and a professional or agency will be appropriately voiced and discussed, with the referrer following appropriate escalation procedures if they remain dissatisfied and if the circumstances warrant, in line with the Local Authority escalation procedures. Any disagreements or escalation will be recorded in writing by the referrer.
- The Designated Safeguarding Lead or their Deputy will be a proactive contributor to any strategy meeting, Child Protection conference/review, and core group, and will attend professionals' meetings where requested, providing appropriate written and/or verbal education and welfare reports related to the pupil and their family as requested by agencies and in line with statutory information sharing guidance.
- Records of all safeguarding work will be made on the pupil's safeguarding record. Any actions arising from a concern will be followed up and documented, and records of any communication with staff, external agencies and parents related to safeguarding will be documented on the pupil's record within 24 hours.
- Minutes and action plans of meetings will be retained on a pupil's safeguarding record, with relevant actions being fed back to the appropriate members of the team, and any progress towards meeting required actions and outcomes also recorded.

Family Help

Note – At the time of policy review, West Sussex Council have not updated their thresholds and provision to change from Early Help and Section 17 CIN, to Family Help (as per WTTSC26). The College receives a number of pupils from a wide range of local authorities who each have their own procedures and thresholds. The safeguarding team will consider these when supporting a family.

Staff are aware of children who may need early intervention, such as a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
- is a privately fostered child.

- The College recognises the importance of working in partnership with local authority "Family Help" arrangements, which brings together early help and statutory services via Section 17 (CIN) to provide coordinated intervention for children and families.
- The College recognises that early intervention when a child or family is starting to show signs of concern can be critical to ensure that the right help and support is sourced, preventing any further escalation of issues or a decline in the child's safety and wellbeing.
- The College recognises that partnerships with parents and carers are crucial in identifying the need for early intervention and for effective collaboration to improve the life chances for pupils. The College works proactively with parents and carers to develop effective relationships between home and The College, and to promote the benefits of early help and intervention to support their child, be that internally provided by the College or externally provided by the Local Authority Early/Family Help offer.
- Any child can benefit from early intervention, although the College is particularly alert to the needs of SEND pupils, including those with physical and/or mental health needs; young carers; pupils vulnerable to antisocial behaviour, gangs, abuse, exploitation and radicalisation; pupils currently in or recently returned from care or those being privately fostered; pupils misusing drugs or alcohol or living in households where drugs or alcohol are being misused; pupils who struggle with their mental health; pupils living in households with domestic violence or parental mental health

concerns; pupils who are persistently absent, run away or go missing; parents in the criminal justice system.

- In a case where a concern about a pupil does not suggest a risk of significant harm but they remain in need of additional support, the Designated Safeguarding Lead or their Deputies will liaise with parents and, with their permission, follow local Early/Family Help Assessment guidelines in order to source the most appropriate support. This may include referring the child or family to specific support services with the family's consent. The Designated Safeguarding Lead or their Deputies may seek advice about available support locally for a child/family with the Early Help Link worker.
- The Designated Safeguarding Lead or their Deputies will be a proactive instigator and/or contributor to any Early/Family Help Assessment and subsequent Team Around the Family meeting and, as above, will lead or attend professionals' meetings where requested, providing appropriate written and/or verbal education and welfare reports related to the pupil and their family as requested by agencies.

The College provides internal Early/Family Help support through the Head of Mental Health, the Pastoral Intervention Practitioner, regular communication and supportive meetings with children and parents, Learning Support intervention, Coaching, Mindfulness, peer support groups, peer interventions and the offer from Place2be.

Annex A- Key External Contact Details

Local Authority Designated Officer	Miriam Williams, Donna Tomlinson and Victoria Williams TEL: 03302 223339 EMAIL: LADO@westsussex.gov.uk Referral portal: LADO Referral
Local Authority Children's Social Services	TEL: 01403 229900 EMAIL: WSChildrenservices@westsussex.gov.uk OUT OF HOURS EMERGENCY DUTY TEAM TEL: 033 022 26664 Integrated Front Door referral portal: Request for Support
Early Help	Early Help services - West Sussex County Council EMAIL: WSChildrenServices@westsussex.gov.uk TEL: 01403 229900
Multi-Agency Safeguarding Hub	TEL: 01403 229900 EMAIL: WSChildrenservices@westsussex.gov.uk
Support and Advice about Extremism	**Police** TEL: 101 Ext. 531355 EMERGENCY: 999 NON-EMERGENCY NUMBER: 101 EMAIL: prevent@sussex.pnn.police.uk **Local Authority West Sussex Channel Panel Chair, Beverly Knight, Community Safety and Wellbeing, WSCC**

	TEL: 0330 222 4223 EMAIL: beverly.knight@westsussex.gov.uk PREVENT LEAD: Beverly Knight **Department for Education** NON-EMERGENCY NUMBER: 020 7340 7264 EMAIL: counter.extremism@education.gov.uk
NSPCC Whistleblowing Advice Line	ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: help@nspcc.org.uk
NSPCC Report Abuse in Education Advice Line	TEL: 0800 136 663 EMAIL: help@nspcc.org.uk
Disclosure and Barring Service	ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@dbs.gov.uk
Teaching Regulation Agency	ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 5pm) EMAIL: CIE@ofsted.gov.uk
Independent Schools Inspectorate	TEL: 0207 6000 100 EMAIL: concerns@isi.net

Annex B - Types of Abuse

All College staff should be aware that abuse, neglect or exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another therefore staff should always be vigilant and always raise any concerns with the DSL (or DDSL).

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSL, should consider whether children are at risk of abuse, neglect or

exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSL (or DDSL).

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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, including where they see, hear or experience its effects. 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. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child (including through corporal punishment). 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 verbal abuse, such as persistent criticism, belittling, or name-calling, as well as 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, causing or inciting a child 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, such as acts of penetration, whether that is with part of a person's body or an object (e.g. rape or assault by penetration), and non-penetrative acts such as masturbation, kissing, rubbing, and touching over clothing. Sexual abuse may also include non contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online as well as offline, 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. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. 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. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Child-on-child sexual violence and/or harassment: Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Further information can be found in the *SVSH* advice.

Harmful sexual behaviour: problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Sexual harassment: Sexual harassment refers to 'unwanted conduct of a sexual nature' which can occur both online and offline and inside and outside of school or college. In this context it specifically relates to child-on-child sexual harassment. Such behaviour can:

- violate a child's dignity,
- make them feel intimidated, degraded or humiliated, and
- create a hostile, offensive or sexualised environment.

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

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothing or appearance and using sexualised names,
- sexual "jokes" or taunting,
- physical behaviour, such as deliberately brushing against someone, or interfering with someone's clothes. Schools and colleges should assess when such behaviour crosses into sexual violence – it is important to talk to and consider the experience of the victim,

- displaying pictures, photos or drawings of a sexual nature,
- upskirting (this is a criminal offence),
- online sexual harassment, which may occur independently, or as a broader pattern of sexual harassment and/or sexual violence. This may include:
    - consensual and non-consensual making or sharing of nudes or semi-nudes.
    - sharing of unwanted explicit content,
    - sexualised online bullying,
    - unwanted sexual comments and messages, including, on social media,
    - sexual exploitation; coercion and threats, and
    - coercing others into sharing images of themselves or performing acts they're not comfortable with online.

It is important that schools and colleges consider sexual harassment in broad terms. If left unchallenged, it can foster a culture that normalises inappropriate behaviour and increases the risk of leading to sexual violence.

Sexual violence: Schools and colleges should be aware that child-on-child sexual violence can and does occur, both inside and outside of school/college.

In this guidance, sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 as described below:

- *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 the 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 her/his 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. (NOTE - Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault).
- *Causing someone to engage in sexual activity without consent:* A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).
- *What consent is:* 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, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. 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 any sexual activity,
    - the age of consent is 16
    - sexual intercourse without consent is rape

Extra Familial Harms: take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

Consensual and non-consensual sharing of sexual imagery: the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or involve sharing between devices using offline services. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Any incident of adults sharing nudes or semi-nudes of under 18-year olds is a form of child sexual abuse and must be referred to the police as a matter of urgency. The motivations for taking and sharing nude and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame
- The use of AI may be used to generate content about a child

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" sets out the classification of incidents, and how each should be handled.

If an incident occurs:

- Report it to the Designated Safeguarding Lead (DSL) or equivalent immediately.
- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal
- Note: In exceptional circumstances, it may be necessary for the DSL (or equivalent) only to view the image to safeguard the child or young person. That decision should be based on the professional judgement of the DSL (or equivalent). A second adult should be with them while this happens
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.

- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

Upskirting: is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

Serious violence: indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

Child sexual exploitation (CSE): CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The below CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled "*Child sexual exploitation: guide for practitioners*".

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Child criminal exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for

something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country or online (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

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

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help maintain them in education.

County lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of “deal line”.

This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county

lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- that have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Modern Slavery: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (May 2026)*".

Cybercrime: is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does <u>not</u>

currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.gov.uk.

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

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

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL or DDSL.

The DfE has published advice and guidance on *Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools*. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance *Promoting Children and Young People's Emotional Health and Wellbeing*. Its resources include social media, forming positive relationships, smoking and alcohol.

So called 'honour based' abuse: 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.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL or DDSL) who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care.

There is a statutory duty on teachers to personally 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. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (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 it involves a pupil over 18, teachers should follow the School's local safeguarding procedures.

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.

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.[234] 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. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the *Multi-agency guidelines: Handling cases of forced marriage*. Further information on forced marriage is available in guidance published by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fco.gov.uk.

Preventing Radicalisation: Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

> *Extremism* is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
>
> *Radicalisation* is the process of a person legitimising support for, or use of, terrorist violence.
>
> *Terrorism* is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern.

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn into terrorism. 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 the designated safeguarding lead (or a deputy) Making a Prevent referral.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in education settings should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 141-210, which are specifically concerned with education (and also covers childcare). The guidance is set out in terms of three general themes: leadership and partnership, capabilities and reducing permissive environments.

The school or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are first assessed by police and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. Whilst the referral is being assessed, should any further or new information come to light, this should also be passed to police. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

The designated safeguarding lead (or a deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse, incidents that may indicate concerns about serious violence or harmful behaviours and/or details of those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

Special educational needs and/or disabilities (SEND), or pupils with certain health conditions: Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain health conditions being disproportionally impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;

- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Children who are lesbian, gay or bisexual
A child or young person being lesbian, gay, or bisexual is not in itself a risk factor for harm; however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are. Hurst College is robust in educating young people about prejudice and will manage any incidents through educating the young people involved and/or use of the behaviour policy.

(See above section for Gender Questioning Children)

Domestic abuse: The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a 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.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

Hurst College is signed up to the Operation Encompass which is an information-sharing scheme between the police and relevant educational settings. The scheme enables territorial police forces in

England and Wales to notify educational settings and, where relevant, local authorities about domestic abuse incidents they attend, including those attended via Rapid Video Response. Incidents are subject to an Operation Encompass notification where a child under 18 is a victim of domestic abuse. This includes children who are physically present at the incident, children who are not physically present during the incident, and situations where the child might reside in another household temporarily or permanently. The aim is to support educational settings to provide timely, informed support to children affected by domestic abuse in the environment where they spend most of their time, in line with their existing duties and responsibilities as set out in existing statutory guidance.

The DSL and members of the safeguarding team are responsible for leading on all safeguarding and child protection matters within an educational setting. They are the Key Adult for Operation Encompass notifications and are responsible for making safeguarding referrals to appropriate agencies, maintaining up-to-date safeguarding policies and training, overseeing record-keeping, and liaising with families where appropriate.

College staff can contact Operation Encompass on 0204 513 9990 for advice in respect of children who have experienced domestic abuse.

Private Fostering
Occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.
Such arrangements may come to the attention of school and college staff through the normal course of their interaction, and promotion of learning activities, with children. Where the arrangements come to the attention of the school or college (and the school or college is not involved in the arrangements), they should then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child.

Schools and colleges who are involved (whether or not directly) in arranging for a child to be fostered privately must notify local authorities of the arrangement as soon as possible after the arrangement has been made.

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

College Attendance
Please see Attendance, Registration and Absence Policy for more detail

Low attendance and absent children –

The College recognises that regular school attendance is a key component of safeguarding and promoting the welfare of children. Absence from education, including persistent absence, may be an indicator of safeguarding concerns, including abuse, neglect, exploitation or mental health difficulties.

The College adopts a proactive, whole-school approach to attendance in line with statutory guidance, recognising that improving attendance is everyone's responsibility

All staff should be aware that:
- poor attendance or irregular attendance may be a sign of wider safeguarding issues;
- patterns of absence, including repeated short absences, lateness or absence on particular days, may indicate risk;
- children who are absent from education, as well as those missing education, are potentially at risk of harm.

Staff must remain professionally curious and report concerns about a pupil's attendance in accordance with safeguarding procedures. Where there is any concern that absence may be linked to safeguarding, this must be referred to the Designated Safeguarding Lead (DSL) without delay.
Any concerns about a child's attendance must be reported in line with safeguarding procedures and referred to the safeguarding team where appropriate.

Responsibilities

The College will:
- monitor attendance data closely to identify patterns, trends and individual concerns at an early stage;
- ensure that attendance concerns are considered alongside other safeguarding information to build a full picture of the child;
- respond promptly to unexplained absence and follow up with parents/carers;
- work collaboratively with families to identify and address barriers to attendance;
- ensure that appropriate support is implemented where attendance concerns are identified.
- request medical evidence if a child is off school for an extended period of time due to a stated medical reason
- Routinely check in directly with a child who is off school to ensure their welfare

The Designated Safeguarding Lead (DSL) and their deputies will:
- be informed of attendance concerns where there may be a safeguarding element;
- contribute to multi-agency working where a child's attendance forms part of wider safeguarding concerns e.g. fulfil West Sussex Local Authority mandate to report low attendance to them
- ensure that attendance data is used proactively to inform safeguarding decisions.
- closely monitor vulnerable pupils' attendance
- respond swiftly if a child's absence or poor attendance indicates potential risk of harm

Early/Family Help and Multi-Agency Working

The College recognises that improving attendance may require early/family help and coordinated support. Where attendance issues persist, the College will:
- consider whether an Early/Family Help referral is appropriate;
- work in partnership with local authority services and other agencies;
- contribute to multi-agency plans to support the child and family.

Where there is a risk of significant harm, a referral to children's social care will be made as per *Information Sharing Duty Statutory guidance for safeguarding organisations and their practitioners 2026*

Children who go missing from school: A child going missing from school is a potential indicator of a range of safeguarding issues including abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff must follow the College's procedures for dealing with children who go missing, particularly persistently. The College's procedure for dealing with children who go missing can be found in the Attendance, Registration and Absence Policy (which includes procedures for Children who go missing from site and Children Missing in Education). All unexplained absences will be followed up in accordance with these policies.

The College shall inform the local authority of any pupil who is going to be added to or deleted from the College's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

a) fulfil its duty to identify children of compulsory school age who are missing from education; and
b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, or radicalisation.

Attendance registers are carefully monitored to identify any trends. The College will inform the local authority where the child is normally resident for any pupil who fails to attend school regularly, or has been absent without the College's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the College and the local authority.

Action should be taken in accordance with this policy if any absence of a pupil from the College gives rise to a concern about their welfare. The College's policy supports identification of abuse and provides preventative measures against the risk of the child going missing in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

Child abduction and community safety incidents: Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers. The PSHCE curriculum educates children about how to be safe in public and around strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system: Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The College may refer some parents and carers to this service where appropriate. The college will share information requested by social workers, police, CAFCASS or with solicitors as approved by the family court. This provides a third party and more neutral management of information about the child and family.

Children with family members in prison: Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Annex C- Reporting and Recording Concerns

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

The guidance, as per *Information Sharing Duty Statutory guidance for safeguarding organisations and their practitioners 2026* supports staff who have to make decisions about sharing information. Governors of Hurstpierpoint College Ltd recognise the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the College and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under the Data Protection Act 2018 and the UK GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL").

Governors of Hurstpierpoint College Ltd will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child at risk
- not providing pupils' personal data where the serious harm test is met.

If a child makes a disclosure or raises a safeguarding concern, all staff should:

- listen carefully

- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Staff should exercise professional curiosity and speak to the DSL if they have concerns to determine how best to build trusted relationships with children and young people which facilitate communication

All concerns, discussions, and decisions (together with reasons) made under these procedures should be recorded in writing. This will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of *KCSIE*.

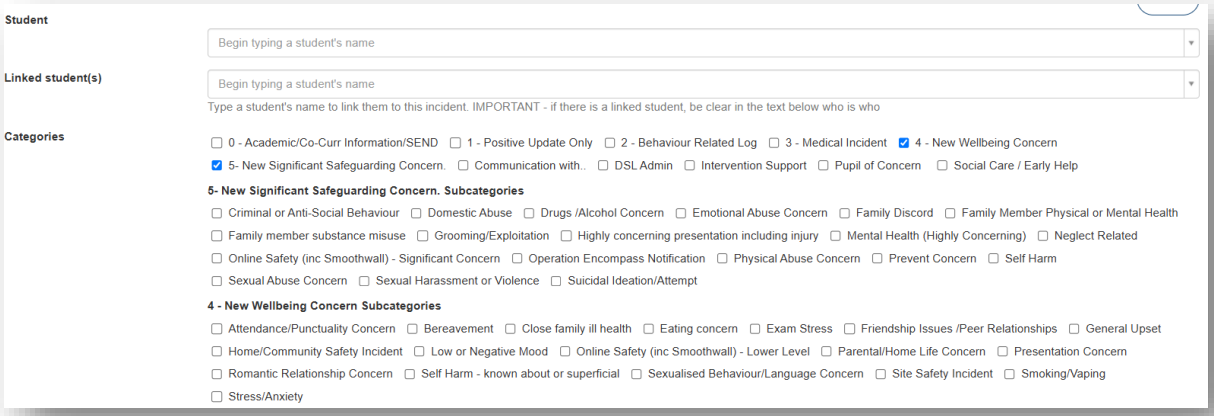
Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy).

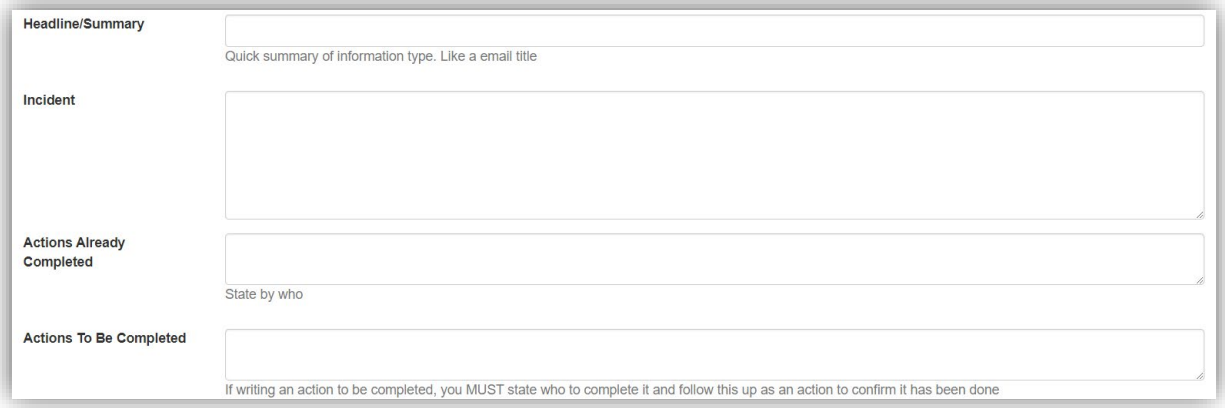
Where there is a safeguarding concern, the College will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The College manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, neglect or exploitation, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. The College operates its processes with the best interests of the pupil/s at their heart.

The review, reaction and response to the below concerns is the responsibility of the DSLs who will triage the information, assess the risk and implement actions, this will be recorded in writing. More information about this is found in the Roles and Responsibilities section and Processes, procedures, and inter-agency liaison section.

What staff should do if they have concerns about a child

Some staff, who work directly with children and have regular access to a computer have access to CPOMS where they are to fill out and submit the following:





Screenshot of CPOMS

Some staff, volunteers and visitors that do not have access to CPOMS but need to raise a concern, can come to speak to, e-mail safeguarding@hppc.co.uk, call or may send a Teams message to the Safeguarding Team (whose details in Annex A and at the front of the Policy) or fill out the concern form which is located at both the Prep and Senior School receptions and in the College work rooms. Safeguarding visitors' procedures are found in the visitors leaflet, all staff have a contact card attached to their lanyards and there are posters around the College to show the contact details for the safeguarding team.
If staff have a concern which indicates that a child has been harmed/abused or could be at risk of harm/abuse they must report it to the safeguarding team as soon as possible. If the concern indicates a safeguarding risk, the safeguarding team will lead on the next steps, actions and record keeping. Staff are required to also come and find or contact a member of safeguarding team if a child is at urgent risk of harm, they must not rely on just emailing or adding to CPOMS.

If the concern indicates a wellbeing concern, someone who has a strong relationship with the child/family may lead on the response to this e.g class teacher, house mistress/master. The safeguarding team will oversee the response and record keeping.

What staff should do if a child is in danger or at risk of harm

- If staff (including governors, supply staff, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the police. Anyone can make a referral. Any such referral must be made

immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

- Staff may need to check on ISAMS for the Local Authority of the pupil at their home address.
- Around the College, posters indicate the West Sussex contact line and more information can be found in Annex A.

What staff should do if a child is seen as at risk of radicalisation/Prevent Procedures

- Staff should follow the College's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or submit a referral form to MASH/IFD or call them directly. Advice and support can also be sought from children's social care.
- The College, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, works with other local partners, such as the police to manage risk.
- The Head of College, DSL/DDSLs and governors responsible for safeguarding will ensure the College's safeguarding and online safety arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism.

What staff should do if they discover an act of Female Genital Mutilation ("FGM")

Staff must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. Staff are referred to Annex 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

What staff should do if they have concerns that children are at risk from or involved with serious violent crime

All staff should be aware of indicators which may signal that children are at risk from or are involved with serious violent crime. These may include increased absence from College, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the College's DSL to agree a course of action, although staff can make a direct referral to children's social care.

How should staff respond to an incident of nudes and semi-nudes being shared by pupils

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The

sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.
The DSL will follow the Gov.uk "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (March 2024) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process
- If not, the incident can be handled in school in accordance with the "sharing nudes" guidance and the School's Child Protection and Behaviour policies.
- If it is determined that there is a risk of harm, the DSL must make a referral to children's social care and/or the police immediately.

All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. Schools must record the reason for not reporting incidents externally and ensure it is signed off by the Head. Records will be kept in line with statutory requirements set out in *KCSIE* and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

What staff should do if a child goes missing from education

- Children who go missing from education, particularly persistently, can be a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is therefore important that the College's response to such absence supports identifying such abuse and helps prevent the risk of them going missing in the future. The Colleges' procedures for unauthorised absence and for dealing with children who go missing from education are contained in the schools Attendance, Registration and Absence Policy (which includes procedures for Children who go missing from site and Children Missing in Education)
- Where reasonably possible, the College will hold more than one emergency contact number for each pupil to provide the College with additional options to make contact with a responsible adult particularly when a child missing from education is also identified as a

welfare and/or safeguarding concern. For EYFS children, more than two emergency contacts will be recorded.

- The College will report to the relevant Local Authority a pupil who fails to attend school regularly or has been absent from school without the College permission for a continuous period of 10 school days or more.

What staff should do if a child requires mental health support

- The College has an important role to play in supporting the mental health and wellbeing of its pupils. 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. The College aims to prevent health problems by promoting resilience as part of a whole College approach to social and emotional wellbeing of pupils.
- Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE *Mental Health and Behaviour in Schools* guidance. Public Health England has produced a range of resources to support teachers to promote positive health, wellbeing, and resilience among young people.
- If a child presenting in a way that indicates they are at risk of harm to themselves or others due to their mental health, the College will seek medical attention for them e.g taking them to A&E, calling an ambulance, contacting parents to collect for them to seek medical intervention.

What staff should do it they have concerns about safeguarding practices in the College

- The College aims to ensure there is a culture of safety and raising concerns and an attitude of **'it could happen here'.**
- Where staff have concerns about poor or unsafe practices and potential failures in the College's safeguarding systems, these should be raised in accordance with the College's whistleblowing procedures which can be found in the College's Whistleblowing Policy. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the College or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

What should staff do if they need to use 'Restrictive Interventions:
Guidance to be followed: Use of reasonable force and other restrictive interventions guidance. Further information can be found in the behaviour policy and in the Search Procedure Policy.

Terminology:

***"Reasonable force:** a term used in legislation which includes physical restrictive interventions. All members of school staff have the legal power to use reasonable force in limited circumstances. Reasonable means using no more force than is necessary for the least amount of time, the application of which will depend on the circumstances.*

***Seclusion:** a non-disciplinary intervention involving keeping a pupil confined to a place away from others, and preventing them from leaving either by physical obstruction, blocking, or making them believe they will be punished if they try to leave.*

Restraint: *a term used in legislation referring to a non-disciplinary intervention which immobilises a pupil or limits their movement. This may or may not include direct physical contact. For example, holding a pupil's arms to their sides or removing a pupil's crutches would both be considered forms of restraint."*

Staff are able to provide some reasonable physical touch to pupils, depending on circumstance. Examples of this include:

- *" to give first aid*
- *to guide or escort pupils, such as holding the hand of a pupil at the front/back of the line when going to assembly, when walking together around the school or on a school trip, or when helping a pupil to a space they have chosen to access to self regulate*
- *to comfort a distressed pupil*
- *to congratulate or praise a pupil, for example a pat on the back or a handshake*
- *to demonstrate how to use a musical instrument*
- *to demonstrate exercises or techniques during PE lessons or sports coaching"*

During safeguarding training, staff are asked to consider their use of physical touch to consider:

- Is it needed/necessary
- Who is it benefiting
- Who is instigating the physical contact
- Asking consent
- How can risk be reduced, e.g side on hug, open area with others present, the age of the child

These help staff to risk manage aspects of physicality with children.

Reasonable Force

"All members of school staff have a legal power to use restrictive intervention in certain circumstances. To prevent or stop a pupil from:

- *causing injury to themselves or others*
- *committing a criminal offence*
- *damaging property*
- *causing disorder among pupils at the school, whether during a teaching session or otherwise"*

Power to Search

Staff have *"a statutory power to search a pupil or their possessions where they have reasonable grounds to suspect that the pupil may have a prohibited item." Further information can be found here: Searching, Screening and Confiscation and in the behaviour policy and the Search Procedure Policy.*

Seclusion

Seclusion is able to be used as – *"a non-disciplinary intervention involving keeping a pupil confined to a place away from others and prevented from leaving - should only be used as a safety measure to protect others from harm when a pupil is experiencing high levels of emotional or behavioural dysregulation. In such circumstances, the pupil is not acting with intent. Seclusion should not be implemented by staff through threat of punishment."*

Restraint

"Pupils should not be restrained in a way that affects their airway, breathing or circulation, for example, by covering the mouth and/or nose, or applying pressure to the neck region or abdomen. The use of force can be dangerous, particularly where it occurs on the ground. If a pupil is unintentionally held on the ground, staff should release their holds or re-position into a safer alternative or standing position as quickly as possible. Where appropriate, the pupil should receive a medical assessment and treatment for any injuries as soon as possible. For any form of restraint, including seated and standing, there is a risk of physical and psychological harm, and it should be avoided where possible."

Managing an incident

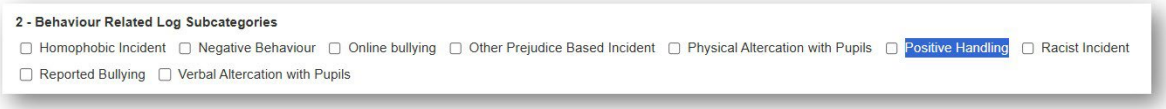
When considering using these interventions, staff need to consider:

- *Is it necessary*
- *Is it proportionate*
- *Have you considered the pupils welfare*
- *Has a child's SEND or disability been considered*

The primary focus in any risk situation needs to be about de-escalation and reduction of harm. If providing reasonable force is required to manage the situation, staff are entitled to take appropriate action.

Staff have a duty to report any incidents of this nature. Members of the safeguarding and behaviour team will then investigate.

Recording via CPOMS:



Details should include:

- *names of pupil and staff directly involved*
- *any relevant needs or circumstances of the pupil, including whether the pupil involved has an identified special educational need or disability and their SEN status code*
- *time, date, location and approximate duration of the intervention*
- *brief account of the incident, including what led up to the incident, identified or potential triggers if known, any preventative or de-escalation strategies used, and (where relevant) what type of reasonable force was applied, the degree of force, and details of any physical injuries sustained*
- *brief account of why the use of force was assessed as necessary in that instance*
- *any post-incident support, such as details of any medical treatment for injuries or other adverse impacts*

Parents will be informed of 'significant use of force', use of restraint or seclusion (unless there is a safeguarding reason not to share). College leaders and parents will then consider:

- "any behavioural triggers or warning signs of an impending incident
- whether any agreed behaviour support plans were followed
- what de-escalation strategies were used and how effective they were
- what might be done differently in the future

Annex D – Low Level Concerns and Allegations

The College follows Part 4 of Keeping Children Safe in Education to manage and follow up on concerns raised about adults working with children. This includes supply staff, trainee teachers, volunteers, and contractors and the below information is relevant to all these groups.

KCSIE differentiates two levels of concerns and allegations:

1. Concerns / allegations that may meet the harm threshold.
2. Concerns / allegations that do not meet the harm threshold – referred to for the purposes of this guidance as 'low-level concerns'

Prevention

All staff have received safeguarding training in which concerns about adults is covered. This includes, the law about sexual offences against children, what would indicate a concern about adults conduct, signs and indicators of grooming, how to instil boundaries with children and how to report concerns. The Staff Code of Conduct is signed by all staff which outlines expectations around standards and behaviour. Staff are requested to do the following to reduce risk of grooming and sexual abuse of children:

- Don't share your phone number with children or have social media contact with them
- Keep communication professional and do not overly share personal details
- Maintain clear adult/child boundaries (you are not their friend)
- Be careful around physical touch – is it needed/necessary
- Do not meet up with children outside of school
- Keep personal social media private and report if children are trying to make contact
- Do not give lifts to children (unless authorised to do so)
- Try not to be alone with children e.g in their bedrooms
- Report if a child is being over-familiar with you
- Not to have contact with a child who attended Hurst College, until 2 years after they leave, including when they turn 18

Staff are asked to be proactive and declare incidents of concern, about themselves or others, to the safeguarding team so we can work together on the management of this.

Reporting and Recording

Any concern about an adult working with children needs to be reported to key members of the safeguarding team. They will then assess the risk to consider whether it would be considered a 'Low-Level Concern' or 'Allegation'. If there is a question about whether the harms threshold has been met, and time allows for it based on risk, a meeting will be held with the DSL (Caty Jacques), Head of Safeguarding (Siobhan McCurdy) or Head of College (Dominic Mott) and Sue Atkinson (Director of HR) to discuss the case and consider next steps.

Concerns about adults need to be reported emailing staffconcerns@hppc.co.uk and coming to speak with one of the following: DSL (Caty Jacques), Head of Safeguarding (Siobhan McCurdy) or Head of College (Dominic Mott). Where a concern is raised about the Head of College, it should be referred to the Chair of Governors (Karen Mack) – contact details listed above.

The recording of Low Level Concerns and Allegations, as well as the follow up investigations and outcomes will be recorded on CPOMS StaffSafe – this is a secure system which only DSL (Caty Jacques), Head of Safeguarding (Siobhan McCurdy), Head of College (Dominic Mott) and Director of HR (Sue Atkinson), have access to. This system allows for a chronology to be created to then spot any patterns.

Concerns and allegations about adults:

The College's procedures for managing allegations against staff (including supply staff, volunteers and contractors) who are currently working in the College whether in a paid or unpaid capacity follows DfE statutory guidance and Local Child Safeguarding Executive three safeguarding partners arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a child, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

Allegations that do not meet the above harm test should be dealt with using the College's procedure for handling low level concerns set out below or may be followed up through the disciplinary policy

Staff must share concerns about adults by emailing staffconcerns@hppc.co.uk and by coming to speak with one of the following: DSL (Caty Jacques), Head of Safeguarding (Siobhan McCurdy) or Head of College (Dominic Mott). Where a concern is raised about the Head of College, it should be referred to the Chair of Governors (Karen Mack) – contact details listed above. It will be assessed as to whether it has met the harms threshold and is therefore treated as an allegation or as a low level concern or a conduct concern (in which case this will be passed to HR to predominantly case manage). Concerns can be shared verbally but these must be followed up in writing. Staff are also encouraged to self-report any incident with a pupil which may give rise to concern, the safeguarding team will review, recommend actions and log this information.

Allegations against a staff member who is no longer working at The College, should be referred to the LADO and possibly the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police. See Responding to Disclosure of Non-recent Child Abuse Policy for more information.

If an allegation is made against anyone working with children in the College, before contacting the LADO, the College will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The College should not undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, the College may discuss informally with the LADO on a no-names basis.

When dealing an allegation about a staff member the College will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

1. Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the Head of College, DSL or Head of Safeguarding who will identify an appropriate case manager. Where the Head OR DSL is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. The subject of the allegation must not be informed of the allegation prior to contact with the Chair of Governors and LADO.

2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and as appropriate the police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the College's attention and appear to meet the harms threshold or that are made directly to the police and/or children's social care. The DSL and Head of Safeguarding are responsible for ensuring the child is not at risk.

3. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.

4. When to inform the individual who is the subject of the allegation will be considered on a case by case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the College or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:

    - redeployment within the College so that the individual does not have direct contact with the child or children concerned;
    - providing an assistant to be present when the individual has contact with children;
    - redeploying to alternative work in the College so the individual does not have unsupervised access to children;
    - moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
    - temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

    These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the College is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, *Working Together to Safeguarding Children* and *KCSIE* when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the College and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

6. Where a member of boarding staff is suspended pending an investigation, the case manager will consider whether arrangements for alternative accommodation away from children should be made and liaise with the Deputy Head Pastoral.

7. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the College to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the College. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.

8. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the staff member subject to the allegation.

9. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

10. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.

11. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the College ceases to use their services, or the person resigns or otherwise ceases to provide their services. The College has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a pupil) 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. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the

College must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

12. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the College's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the College will make a referral to the DBS.

The College has a duty of care to its staff, and whilst the welfare of a child is paramount, the College must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The College will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA")). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the College's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the College will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

Dealing with concerns and allegations about contractors or supply staff:

The College's procedures for managing allegations against staff above also apply to staff not directly employed by the College, for example, supply teachers provided by an employment agency or business ('the agency'). The College will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the College decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The College will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the College, whilst they carry out their investigation.

The College will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the College during the investigation.

When using an agency, the College should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

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

Low level concerns:

A low-level concern is any concern that an adult working, volunteering or contracted on behalf of the College may have acted in a way that.

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- A referral or consultation has occurred with the LADO who confirms that it can be investigated internally as a low-level concern.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The College takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the College's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff. The Head of College is the ultimate decision-maker in respect of all low-level concerns.

The aim of the Staff code of conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this code of conduct at all times.

Staff must share all concerns with the DSL/Head of Safeguarding/Head of College without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Staff can raise a low-level concern by emailing staffconcerns@hppc.co.uk and coming to speak to the DSL (Caty Jacques), Head of Safeguarding (Siobhan McCurdy) or Head of College (Dominic Mott). Where a low-level concern is raised about the Head of College, it should be referred to the Chair of Governors (Karen Mack) – contact details found above.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.
If a concern is raised by a third party, the Head of College/DSL/Head of Safeguarding will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be logged via the 'Staff Concerns' email account.

The College will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. Low Level Concerns will be recorded on CPOMS StaffSafe, the records will be kept confidential and will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. The information will be retained for six years or until the individual has left employment, whichever is longer.

Once a Low Level Concern has been raised it will be assessed to consider if the harms threshold has not been met. The concern will be investigated and evidence sought to understand more about what happened. This may include checking CCTV, speaking to witnesses and speaking to the individual about the concern.

If the Low-Level Concern is breaching the staff code of conduct, the Disciplinary Policy will be followed through investigation and outcome.

If the concern does not breach the staff code of conduct or is not significant enough for the Disciplinary Policy to be followed, the concern will still be investigated. The member of staff will be invited to share their perspective of the concern as part of the investigation and will be informed that the concern will be logged as a low level concern. They will receive a summary of the concern and outcome in writing.

There may be some occasions where an individual is not told about this formally as the safeguarding team will be monitoring to see if there is a pattern of behaviour forming.

Typically, parents will be informed about what has happened if their child has been directly involved in a low level concern about a member of staff however this will be at the judgement of the safeguarding team and based on presenting risk.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

The College will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the College's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the College will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will the follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the College is in any doubt as to whether a low-level concern in fact meets the harm threshold, particularly if more information comes to light through investigation, the case lead will consult with the LADO and take a more collaborate decision-making approach.

Annex E – Additional Provisions

Lettings

- The College routinely hires out facilities to individuals and companies. Strict safeguarding measures are implemented to ensure that the hirer has correct safeguarding procedures in place. An assessment of the hire is completed as to whether the hire involves children from The College, not from The College or if there are children on site at the time of the hire.
- The College facilities are mapped out to segregate those hiring particular areas of the site and indicate where they can and cannot go. This limits the contact between the hire and children on site.
- All hirers receive information about safeguarding at Hurstpierpoint College and how to raise concerns about children and adults
- Safer recruitment checks are completed on the hire if they involve children from Hurstpierpoint College or there will be contact with children at the college and if the hire is in regulated activity with children, evidence is requested of the checks they have completed on their staff. The checks include, at minimum, Enhanced DBS and barred list checks, overseas police checks, completion of safeguarding training and who the safeguarding lead is. The College will assess the type of work with children and consider greater safer recruitment checks.

Safer Recruitment

The College is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the College whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the College.

Members of the teaching and non-teaching staff at the College including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment but before contact with children. Alternatively, if the applicant has subscribed to it and gives permission, the College may undertake an online update check through the DBS Update Service.

Residents (aged 16+ who are not on school roll) who live onsite but are not employed as staff have: Enhanced DBS and Barred List Check, safeguarding training induction, lanyard for identification, written agreement outlining the terms of their accommodation, guidance, and expectations on contact with pupils, their responsibilities to supervise their visitors, and notice that accommodation may cease to be provided if there is evidence that they are unsuitable to have regular contact with children. They must be required to notify an unrelated designated senior member of staff if they are charged with, or convicted of, any offence.

Full details of the College's safer recruitment procedures for checking the suitability of staff, contractors and volunteers to work with children and young people is set out in the College's Recruitment, Selection and disclosures Policy.

In line with KCSIE 2026 and changes to the definition of regulated activity, volunteers undertaking regulated activity will be subject to an enhanced DBS check including children's barred list information irrespective of supervision arrangements

The College's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is laid out in the College's visitors procedure, found in the Reception Policy.

The College's procedures for managing contractors attending the College site can be found in the College's visitors procedure, found in the Reception Policy and in the Safer Recruitment Policy.

Looked after children

The Governors of Hurstpierpoint College Ltd ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

Head of Learning Support (Jill Silvey) is the designated member of staff who has responsibility for their welfare and progress. The College ensures that the designated member of staff receives appropriate training in order to carry out their role. Siobhan McCurdy (Head of Safeguarding) has also completed the designated teacher training and will support with liaising with social care.

Alternative Provision

If the College places a pupil with an alternative provision provider or authorises a child to attend an organisation instead of regularly attending school, the safeguarding team will complete due diligence safeguarding checks on their practice such as management of safeguarding concerns, attendance procedures and safer recruitment practice. The safeguarding team may also visit the provider to ensure the practice is effective.

DfE guidance will be followed: • Alternative Provision DFE statutory guidance and • Education for children with health needs who cannot attend school - GOV.UK (www.gov.uk) – DFE statutory guidance

Visitors to College who engage with pupil groups

Staff have been informed annually that in advance of any visit, staff need to get authorisation from the Head of Pastoral. They will log the date, name of visitor and reason for visit for anyone who will be addressing the pupil body. Staff are reminded that they must check in advance; that they are fully aware of and happy with the content of the talk of any visiting speakers or those working with groups of pupils.

All visitors are expected to sign in at reception and remain fully supervised throughout their visit. Further information can also be found in the PSHCE Policy.

EYFS Safeguarding Procedures

General principles:

Lucianne Pearson is the EYFS lead who is responsible for implementation of the EYFS Statutory Framework including supervision of EYFS staff to ensure effective practice. Amy Clarke, the Head of the JPS, will oversee this practice and is the safeguarding lead for responsibility of EYFS.

- The EYFS team works in adherence to the expectations in latest Early years foundation stage statutory framework
- Annex C of this document outlines procedures for how staff can share safeguarding concerns about pupils
- Annex D of this document outlines procedures for how staff can share low level concerns and allegations about adults
- The section on Roles and Responsibilities of the DSL outlines procedures for actions being taken about concerns raised
- Further details about safer recruitment checks made on all college staff are found in the Safer Recruitment policy
- The above section titled Induction and Training outlines the safeguarding training which all EYFS staff will be receiving. Regular visits from the Head of Safeguarding to the EYFS area give the opportunity for staff to connect with the safeguarding team and can be supported to put training into practice. EYFS staff and the DSL (and DDSLs) receive training to be complaint to "Annex C: Criteria for effective safeguarding training" in the Early Years Foundation Stage statutory framework.
- EYFS staff have all confirmed they have read 'What to do if you're worried a child is being abused: Advice for practitioners'.
- Attendance procedures for EYFS mirror the whole College practice. Further information is found in the Attendance, Registration and Absence Policy (which includes procedures for Children who go missing from site and Children Missing in Education)
- The safeguarding team meet weekly and discuss cases of low attendance and actions for the whole College.
- Each child in the EYFS will have two emergency contacts. If a child is not present at school and parents are not contactable, the emergency contacts will be contacted to follow up on lack of attendance.

- EYFS staff are not to be under the influence of any drugs, medication or alcohol which would affect their ability to care for children
- Hurst is a no smoking or vaping campus
- Measures are in place to ensure adherence to staff:child ratios, including staff qualifications
- Measures are in place to ensure there is at least one person with paediatric first aid training and available when children are on site, for outings and when the children are eating.
- Details for management of medications is found in the First Aid policy
- Details for procedures of intimate care are found in the intimate care policy. EYFS staff have been trained on the procedures for intimate care.
- Details of management of allergies and intolerances is found in the Allergen Management Policy and the First Aid Policy. EYFS staff have been trained in checking for allergens and how to reduce the risk of choking in children.
- When children are eating, measures have been put in place to ensure there is at least one adult in sight and earshot
- Measures are in place to ensure physical site safety including daily environment checks

Disqualification from working in childcare

Where staff work in, or are involved in the management of, the College's early years or provision of care of pupils under the age of eight, the College will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the College's safer recruitment practices, further details of which can be found in the College's Recruitment and Selection Policy.

The College records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the College will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the College will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

Use of mobile phones, cameras and other electronic devices with imaging and sharing capabilities

The College's policy on the use of mobile phones and cameras in the setting can be found in the College's Acceptable Use Policy and the Pupil use of Mobile phones policy. For example, Staff who wish to use take photographs or video of pupils on a College device must first speak with the DSL for EYFS to obtain their approval before taking any image of a pupil.

- Mobile phones are locked away during working hours
- Smartwatches and fitness trackers are either turned off or on do not disturb and not accessed during working hours
- Mobile phones, smartwatches and fitness trackers can only be used at a designated break time and this must be away from the children
- Parents and visitors are alerted to the fact that the EYFS is a smartphone-free zone through clear signage to this effect. Visitors using a smartphone will not be allowed access to the premises until it is switched off and stored away securely;
- Mobile phones may be required around children during excursions and trips. These will remain out of sight of children.
- No phones, devices or cameras *with imaging and sharing capabilities* are permitted around children when they are visiting the toilet or receiving intimate care.

Whistleblowing, Allegations and Low-Level concerns
Whistleblowing procedures can be found in the College Whistleblowing Policy. This is also covered during safeguarding training. Allegations and low-level concerns are stated above in this policy.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other channels are open to them:

- NSPCC whistleblowing advice line is available. Staff can call 0800 0280285 – 08:00 to 20:00, Monday to Friday and 09:00 to 18:00 at weekends. The email address is: help@nspcc.org.uk. Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.
- Ofsted provides guidance on how to make complaints about a childcare provider: Complaints procedure - Ofsted - GOV.UK (www.gov.uk).
- General guidance on whistleblowing can be found via: Whistleblowing for employees.

DSL for the EYFS
The practitioner designated to take lead responsibility for safeguarding children in the early years settings is the Head of JPS supported by the Head of Safeguarding and DSL team.

Oversight and Review

The Nominated Safeguarding Governor (Philippa Hoyle) is the senior board-level lead designated by the Governing Body to take leadership responsibility for the College's safeguarding arrangements. The Designated Safeguarding Lead (Caty Jacques) takes lead responsibility for safeguarding and child protection across the College. The Head of College (Dominic Mott) ensures this policy is implemented and that the DSL team has the time, resources and support to carry out its role.

The College considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the College's child protection procedures takes place at least annually, including an update and review of the effectiveness of procedures and their implementation, including lessons learnt. The College's DSL team undertake a review of the Safeguarding policy at the end of each academic year to be reviewed and agreed by the SMT in line with KCSIE updates. The College draws on the expertise of staff, including the DSL(s), in shaping the College's safeguarding arrangements and policies.

The College's safeguarding policies and procedures should be transparent, clear, and easy to understand for staff, pupils, parents, and carers. Staff are regularly encouraged to ask any questions about what is acceptable practice and give suggestions on how safeguarding can be improved.

The safeguarding team will work together to continually reflect on best practice, review, amend and adapt accordingly. If after any specific or significant incident; there are any improvements to be made to the College's practice or to help prevent similar events in the future; the College will endeavour to implement for the ultimate benefit of keeping children safe.