MARLBOROUGH COLLEGE

Safeguarding and Child Protection Policy and Procedures

Michaelmas 2023

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Contents

Marlborough College is committed to safeguarding and promoting the welfare of pupils and expects all staff, volunteers and visitors to share in this commitment. We actively listen to all pupils and always take seriously what they tell us. Our aim is for all pupils to enjoy their time at the College and feel safe and secure.

Mrs L Moelwyn-Hughes
The Master

1   Purpose and Aims

1.1   The purpose of this policy is to ensure every child who is a pupil at the College is safe and protected from harm. This means we will always work to:

    1.1.1   protect children and young people from maltreatment;

    1.1.2   prevent impairment of our children's and young people's mental and physical health or development;

    1.1.3   ensure that children and young people grow up in circumstances consistent with the provision of safe and effective care;

    1.1.4   undertake that role so as to enable children and young people to have the best outcomes;

    1.1.5   seek to provide a child-centric approach to safeguarding, which listens to children's concerns, allows children to be confident in their reporting of abuse and know that they will be treated seriously and safely.

1.2   This policy will give clear direction to all staff including volunteers, visitors and parents about expected behaviour and our legal responsibility to safeguard and promote the welfare of all pupils.

    1.2.1   The College fully recognises the contribution it can make to protect children from harm and to support and promote the welfare of all children who are pupils. The elements of our policy are prevention, protection and support.

    1.2.2   The College recognises that our safeguarding responsibilities are clearly linked to our responsibilities for ensuring that appropriate safeguarding responses are in place for children who are absent from the College or who go missing from education.

    1.2.3   This policy applies to all pupils, staff, parents, Council members, volunteers and visitors.

    1.2.4   This policy applies at all times including where pupils or staff are away from the College, whether they are on College-arranged activities or otherwise, and whether or not the College is open. It will therefore apply out of College hours and in the holidays.

    1.2.5   A pupil friendly version of this policy is available in Appendix 2.

2   Introduction

2.1   The pupil's welfare is of paramount importance. The College will establish and maintain an ethos where pupils feel secure, are encouraged to talk, are listened to and are safe. Pupils will be able to talk freely to any member of staff if they are worried or concerned about something. All staff will reassure pupils that they are being taken seriously and that they will be supported and kept safe.

Pupils will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment.

2.1.1 **_Safeguarding is everybody's responsibility._** The College recognises that staff at the College play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. All staff are advised to maintain an attitude of **'_it could happen here_'** where safeguarding is concerned. When concerned about the welfare of a pupil, staff members must always act in the best interests of the pupil.

2.1.2 The College ensures that safeguarding and child protection are at the forefront of and underpins all relevant aspects of process, policy development and College life.

2.1.3 Where there is a safeguarding concern, the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. The systems the College has in place are well promoted, easily understood and easily accessible for pupils to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

2.1.4 All staff will, through policy, training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a pupil and how to record and report this information. The College will not make promises to any pupil and the College will not keep secrets. Every pupil will know what the adult will have to do with any information they have chosen to disclose. All staff will be trained to recognise that pupils may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

2.1.5 Throughout our broad and balanced curriculum, the College will provide activities and opportunities for children to develop the knowledge, values and skills they need to identify risks, including knowing when and how to ask for help for themselves and others to stay safe (this includes online).

2.1.6 At all times the College will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (2018) and the Wiltshire Safeguarding Vulnerable People Partnership (SVPP).

2.1.7 As part of our responsibilities for safeguarding and promoting the welfare of pupils, the College will provide a co-ordinated offer of early help when additional needs of children are identified. These may include if a child:

2.1.7.1 is disabled and has specific additional needs;
2.1.7.2 has special educational needs (whether or not they have a statutory education, health and care plan);
2.1.7.3 has a mental health need;
2.1.7.4 is a young carer;
2.1.7.5 is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
2.1.7.6 is frequently missing/goes missing from care or from home;
2.1.7.7 is misusing drugs or alcohol themselves;
2.1.7.8 is at risk of modern slavery, trafficking or exploitation;
2.1.7.9 is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
2.1.7.10 has returned home to their family from care;
2.1.7.11 is showing early signs of abuse and/or neglect;
2.1.7.12 is at risk of being radicalised or exploited;

2.1.7.13	is at risk of 'honour' based abuse such as Female Genital Mutilation or Forced Marriage;
2.1.7.14	is a privately fostered child;
2.1.7.15	has a family member in prison, or is affected by parental offending;
2.1.7.16	is persistently absent from education, including persistent absences for part of the College day.

2.2 The College understands the importance of working in a way that adheres to the Human Rights Act 1998, Equality Act 2010 and Public Sector Equality Duty. The College has a duty to make reasonable adjustments for disabled children and young people.

2.3 This means the College does not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

3 Scope and Application

3.1 This policy is designed to address the specific statutory obligations on the College to safeguard and promote the welfare of children and the College's charity law safeguarding duty to provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff and volunteers.

3.2 The College aims to set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly. The College has adequate safeguarding policies, procedures and measures to protect people and provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the Police, Local Authority and Charity Commission.

3.3 The College aims to communicate through this policy that the College has a zero-tolerance approach to child-on-child abuse.

4 Regulatory framework

4.1 This policy has been prepared to meet the College's responsibilities under the following legislation:

4.1.1	The Education (Independent School Standards) Regulations 2014
4.1.2	Boarding schools: national minimum standards (Department for Education (DfE), 2023)
4.1.3	Education and Skills Act 2008
4.1.4	Children Act 1989
4.1.5	Children Act 2004
4.1.6	Safeguarding Vulnerable Groups Act 2006
4.1.7	Children and Social Work Act 2017
4.1.8	Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR)
4.1.9	Equality Act 2010 and
4.1.10	Charities Act 2011

4.2 This policy has regard to the following guidance and advice:

4.2.1	Working Together to Safeguard Children DfE (July 2018)
4.2.2	Keeping Children Safe in Education (KCSIE) DfE (2023)
4.2.3	Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings (February 2023)
4.2.4	What to do if you're worried a child is being abused DfE (March 2015)
4.2.5	Information sharing: advice for practitioners providing safeguarding services DfE (July 2018)https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf

<table>
<tr><td>4.2.6</td><td>The Prevent duty: Departmental advice for schools and childcare providers DfE (June 2015)</td></tr>
<tr><td>4.2.7</td><td>Mandatory Reporting of Female Genital Mutilation - procedural information Home Office (December 2015)</td></tr>
<tr><td>4.2.8</td><td>Sexual violence and sexual harassment between children in schools and colleges DfE (July 2021)</td></tr>
<tr><td>4.2.9</td><td>Child sexual exploitation: guide for practitioners DfE (February 2017)</td></tr>
<tr><td>4.2.10</td><td>Teaching online safety in schools DfE (June 2019)</td></tr>
<tr><td>4.2.11</td><td>Mental Health and Behaviour in Schools DfE (November 2018)</td></tr>
<tr><td>4.2.12</td><td>Data protection: toolkit for schools DfE (September 2018)</td></tr>
<tr><td>4.2.13</td><td>Promoting the education of children with a social worker (June 2021)</td></tr>
<tr><td>4.2.14</td><td>Preventing youth violence and gang involvement</td></tr>
<tr><td>4.2.15</td><td>Criminal exploitation of children and vulnerable adults: county lines</td></tr>
<tr><td>4.2.16</td><td>Wiltshire Safeguarding Vulnerable People Partnership thresholds guidance (December 2018)</td></tr>
<tr><td>4.2.17</td><td>Relationships Education, Relationships and Sex Education (RSE) and Health Education</td></tr>
</table>

4.3 Charities advice:

<table>
<tr><td>4.3.1</td><td>Strategy for dealing with safeguarding issues in charities (Charity Commission, December 2017)</td></tr>
<tr><td>4.3.2</td><td>Regulatory alert to charities - safeguarding (Charity Commission, December 2017)</td></tr>
<tr><td>4.3.3</td><td>How to report a serious incident in your charity (Charity Commission, June 2019)</td></tr>
<tr><td>4.3.4</td><td>Reporting a serious incident in your charity when it involves a partner (Charity Commission, December 2019)</td></tr>
<tr><td>4.3.5</td><td>Report serious wrongdoing at a charity as a worker or volunteer (Charity Commission, June 2019)</td></tr>
<tr><td>4.3.6</td><td>Guidance on handling safeguarding allegations in a charity (Office for Civil Society, January 2019)</td></tr>
</table>

4.4 The following College policies, procedures and resource materials are relevant to this policy and available on the College Intranet (Firefly):

<table>
<tr><td>4.4.1</td><td>Staff Code of Conduct</td></tr>
<tr><td>4.4.2</td><td>Allegations against staff and low-level concerns Policy</td></tr>
<tr><td>4.4.3</td><td>Whistleblowing Policy</td></tr>
<tr><td>4.4.4</td><td>Recruitment, Selection and Disclosure Policy and Procedures</td></tr>
<tr><td>4.4.5</td><td>Online Safety Policy</td></tr>
<tr><td>4.4.6</td><td>Behaviour Management Policy</td></tr>
<tr><td>4.4.7</td><td>Countering-Bullying Policy</td></tr>
<tr><td>4.4.8</td><td>ICT Policy for staff</td></tr>
<tr><td>4.4.9</td><td>ICT Policy</td></tr>
<tr><td>4.4.10</td><td>Access, Security and Visitors' Policy</td></tr>
<tr><td>4.4.11</td><td>Risk Assessment Policy for Pupil Welfare</td></tr>
<tr><td>4.4.12</td><td>Children Missing Education Policy</td></tr>
<tr><td>4.4.13</td><td>Special Educational Needs and Disability Code of Practice (SEND) Policy</td></tr>
<tr><td>4.4.14</td><td>Supervision Policy</td></tr>
<tr><td>4.4.15</td><td>Sharing nudes and semi-nudes (Sexting/Youth Produced Sexual Imagery Policy): advice for education settings working with children and young people</td></tr>
<tr><td>4.4.16</td><td>Health and Safety Policy</td></tr>
<tr><td>4.4.17</td><td>Relationships and Sex Education (RSE) Policy</td></tr>
<tr><td>4.4.18</td><td>Policy on Pupil Access to Pastoral Support</td></tr>
<tr><td>4.4.19</td><td>Administration of Medicines and Supporting pupils with Medical Conditions</td></tr>
<tr><td>4.4.20</td><td>Rules of Custom - Mobile Devises</td></tr>
<tr><td>4.4.21</td><td>Educational Guardianship Policy</td></tr>
<tr><td>4.4.22</td><td>Policy for the Care of Pupils who are unwell</td></tr>
</table>

5 Publication and availability

5.1 This policy is published on the College website.

5.2 This policy is available in hard copy on request.

5.3 This policy can be made available in large print or another accessible format if required.

5.4 This policy and all policies referred to in it are available to staff on the College intranet, Firefly (A – Z of Policies).

6 Key Contact Details

Director of Safeguarding Designated Safeguarding Lead (DSL)		**DSL** Mrs Christine Kane Director of Safeguarding Tel: 01672 892519 or 07394 564897 Email: ckane@marlboroughcollege.org **Out of hours / term contact number: 07394 564897**
Deputy Designated Safeguarding Lead (DDSL) **Safeguarding Coordinator and Deputy DSL (DSL)** **Assistant Designated Safeguarding Leads (ADSLs)**		**Deputy DSL** Mr Ed Nightingale Tel: 01672 892523 or 07773 000499 Email: ecn@marlboroughcollege.org **Deputy DSL** **Mrs Rachael Staines** REStaines@marlboroughcollege.org Team of Assistant Designated Safeguarding Leads, the names and contact details are available on the College Intranet or on request. The role is to raise awareness and support the DSL and DDSL in embedding safeguarding across the College. safeguardingteam@marlboroughcollege.org
Safeguarding arrangements for out of hours /out of term		The Director of Safeguarding (DSL) will be the main point of contact for out of hours safeguarding concerns on 07394 564897. The DDSL may support in the out of hours cover during holiday periods. This will be agreed in advance between the Director of Safeguarding and the Deputy Designated Safeguarding Lead and the safeguarding phone number will be diverted to the DDSL for this period.
Deputy Head (Pastoral) Mental Health Lead		Mr Ed Nightingale Tel: 01672 892523 or 07773 000499 Email: ecn@marlboroughcollege.org
The Master		Mrs Louise Moelwyn-Hughes Tel: 01672 892200 Email: ljmh@marlboroughcollege.org
Members of Council		**Chair of Council**

		Tel: 01672 892390
		Nominated Safeguarding Members of Council
		Mrs Penny Cameron Watt
		Tel: 01672 892390
		Email:
		pcameron-watt@marlboroughcollege.org
		Ms Ros King
		Tel: 01672 892390
		Email: RJGravatt@marlboroughcollege.org

Designated Officer(s) For Allegations DOFA (also known as LADO, Local Authority Designated Officer).	Tel: 0300 456 0108 Email: dofaservice@wiltshire.gov.uk
Wiltshire Multi-Agency Safeguarding Hub (MASH)	Tel: 0300 456 0108 Monday-Thursday 9am-5pm and Fri 9am-4pm Email: mash@wiltshire.gov.uk Out of hours emergency duty service: Tel: 0300 456 0100 5pm – 9am and weekdays and 4pm Friday to 9am Monday.
Wiltshire Safeguarding Vulnerable People Partnership (SVPP)	2nd Floor, County Hall, Bythesea Road, Trowbridge BA14 8JN Tel: 01225 713560 Email: LSCB@wiltshire.gov.uk
FGM reporting - non-emergency Police contact number	101
Prevent partners and advice about extremism	Wiltshire Police Tel: Anti-Terrorist Hotline: 0800 789 321 EMERGENCY: 999 NON-EMERGENCY NUMBER: 101 Email: PreventReferrals@wiltshire.pnn.Police.uk Website: www.gov.uk/ACT Wiltshire Council Prevent Team Tel: 01380 826454 or 101 Website: www.wiltshire.gov.uk/community-safety-prevent **Non-emergency DfE advice** Tel: 020 7340 7264 Email: counter-extremism@education.gsi.gov.uk
UK Safer Internet Centre	Tel: 0344 381 4772 Email: helpline@saferinternet.org.uk
NSPCC whistleblowing helpline	Weston House 42 Curtain Road London

	EC2A 3NH Tel: 0800 028 0285 Email: help@nspcc.org.uk https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/
Reporting serious wrongdoing to the Charity Commission	For further guidance see: https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer Email: whistleblowing@charitycommission.gsi.gov.uk
Disclosure and Barring Service	DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF Tel: 03000 200 190 Email: customerservices@dbs.gov.uk
Independent Listener	Mr Andrew Brown Tel: 07879 776 193 Email: ajbrownlistener@gmail.com

7 Roles and responsibilities

7.1 It is the responsibility of *every* member of staff, volunteer and regular visitor to the College to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all of the pupils. This includes the responsibility to provide a safe environment in which pupils can learn.

7.2 **The Marlborough College Council**

7.2.1 The Council is accountable for ensuring the effectiveness of this policy and our compliance with it. Although the Council takes collective responsibility to safeguard and promote the welfare of our pupils, the College also has two named safeguarding Council members who champion safeguarding within the College.

7.3 **The Council will ensure that:**

7.3.1 the Safeguarding and Child Protection Policy is in place and is reviewed annually, is available publicly via the College website and has been written in line with Local Authority guidance;

7.3.2 the College contributes to inter-agency working in line with Working Together to Safeguard Children (2018);

7.3.3 a senior member of staff from the Management Team is designated to take the lead responsibility for safeguarding and child protection and that there is at least one Deputy DSL (DDSL) who is an appropriately trained member to deal with any issues in the absence of the Designated Safeguarding Lead. There will always be cover for this role. The role will be evidenced explicitly in the role holder's job description;

7.3.4 all staff receive a safeguarding induction and are provided with a copy of this policy, the Staff Code of Conduct and Part one of Keeping Children Safe in Education (KCSIE) DfE 2023;

7.3.5 all staff undertake appropriate safeguarding and child protection training that is updated at least annually which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;

7.3.6 Council members review the Department for Education filtering and monitoring standards (https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges) and may discuss with the DSL, IT staff and service providers what more needs to be done to support the College in meeting this standard.

7.3.7 procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance;

7.3.8 safer recruitment practices are followed in accordance with the requirements of Keeping Children Safe in Education (KCSIE) DfE (2023);

7.3.9 they remedy without delay any weakness in regard to the College safeguarding arrangements that are brought to their attention;

7.3.10 the Council receive a safeguarding report at each meeting that will record the training that has taken place, the number of staff attending and any outstanding training requirements for the College. It will also record all safeguarding activity that has taken place, for example, meetings attended, reports written, training or induction given. It will not identify individual staff or pupils.

7.4 The Master

7.4.1 The Master is responsible for the overall management of the College and for the management of concerns and allegations about staff.

7.4.2 The Master ensures that the College's policies and procedures, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff.

7.5 Designated Safeguarding Lead (DSL)

7.5.1 The DSL is a senior member of staff of the College's Management Team with the necessary status and authority to take lead responsibility for all aspects of safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) throughout the College.

7.5.2 The DSL has the time, funding, training, resources and support to enable him/her to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and/or to support other staff to do so) and to contribute to the assessment of pupils. The name and contact details of the DSL are set out in the College contacts list on page 7 of this policy. The main responsibilities of the DSL are set out in KCSIE Annex C 2023.

7.5.3 If the DSL is unavailable, the activities of the DSL will be carried out by the Deputy DSL. The Deputy DSL's details are also set out in the College contacts list on page 7 of this policy.

7.5.4 The DSL will provide advice and support to other staff on child welfare and child protection matters. Any concern for a child's safety or welfare will be recorded in writing and given to the DSL.

7.5.5 The DSL is responsible for ensuring that all staff members and volunteers are aware of the College policy and the procedures they need to follow. The DSL will ensure that all

staff, volunteers and regular visitors have received appropriate child protection information during induction and have been trained appropriately.

7.5.6 The College recognises that a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. The DSL will use the information that they hold about children with a social worker to make decisions in the best interests of the child's safety, welfare and help promote educational outcomes. The DSL will ensure that staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

8 Training and Induction

8.1 When new staff join the College, they will be informed of the safeguarding arrangements in place. They will be given a copy of the safeguarding policy along with the Staff Code of Conduct and Part one of Keeping Children Safe in Education (KCSIE) 2023 and told who the Designated Safeguarding Lead (DSL) and Deputy DSL are. All staff are expected to read these key documents. They will also be provided with login information for the Child Protection Online Management System (CPOMS) and information about how to record and report safeguarding concerns.

8.2 Every new member of staff or volunteer will receive safeguarding training during their induction period. This programme will include information relating to signs and symptoms of abuse, how to manage a disclosure from a child (including reassuring victims that they are being taken seriously and that they will be supported and kept safe), how to record, and the remit of the role of the Designated Safeguarding Lead (DSL). The training includes online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. The training will also include information about whistleblowing in respect of concerns about another adult's behaviour and suitability to work with children.

8.3 In addition to the safeguarding induction, the College will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education (KCSIE) 2023. In order to achieve this, the College will ensure that:

8.3.1 all members of staff will undertake appropriate safeguarding training on an annual basis and the College will evaluate the impact of this training;

8.3.2 all staff members receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively;

8.3.3 all regular visitors, temporary staff and volunteers to the College are directed to the safeguarding policy online and they will be informed of who our DSL and/or other staff responsible for safeguarding are, and what the reporting system is at the point of signing in.

8.3.4 Members of Council will also undertake appropriate training to equip them with the knowledge to provide strategic challenge, to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole College approach to safeguarding. This training takes place at induction and is updated regularly.

9 Relationships and Sex Education (See Relationships and Sex Education (RSE) Policy)

9.1 Relationships and Sex Education (RSE), has been compulsory since September 2020 and is taught as part of the curriculum. The College has regard to the DfE's statutory guidance (Relationships Education, Relationships and Sex Education (RSE) and Health Education) when making arrangements for and teaching RSE. The teaching (delivered in house and in regularly timetabled lessons and reinforced throughout the whole curriculum) will cover relevant topics in an age and stage-appropriate way, enabling pupils to learn about their rights and responsibilities, helping them to behave and stay safe in a variety of contexts on and offline. This will provide further reinforcement to help children identify risks, know when to seek support and develop the skills to ask for help from trustworthy, reliable sources.

10 Educational Guardians

10.1 The College takes steps to ensure that the guardianship arrangement is promoting the welfare, physical wellbeing and emotional wellbeing of the boarder. Any concerns about an educational guardianship arrangement will be reported to the DSL and acted upon immediately and referred to any relevant agencies.

11 Additional Online Tuition, Appointments and Meetings

11.1 Where pupils, parents or guardians have made private arrangements for additional online tuition, appointments and meetings, the College cannot guarantee the safety of pupils. The College cannot carry out recruitment checks on people who are not employees, and the College cannot supervise privately arranged online sessions. Parents must ensure they are satisfied that their children are adequately safeguarded during online tuition, appointments and meetings and should inform the Housemistress or Housemaster (HM) with the details of with whom and when the sessions are taking place.

12 Procedures for managing concerns

12.1 The College adheres to child protection procedures that have been agreed locally through the Wiltshire Safeguarding Vulnerable People Partnership. https://www.proceduresonline.com/swcpp/wiltshire/index.html

12.2 Every member of staff including volunteers are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the pupil and have a responsibility to take action as outlined in this policy.

12.3 All staff must report on CPOMS any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record on CPOMS and pass on concerns in accordance with this policy immediately to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

12.4 It is not the responsibility of College staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.

12.5 The DSL should be used as a first point of contact for concerns and queries regarding any safeguarding concern at the College. Any member of staff or visitor to the College who receives a disclosure of abuse or suspects that a pupil is at risk of harm must report it immediately to the DSL

or, if unavailable, to the DDSL. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.

12.6 All concerns about a child or young person should be reported <u>without delay</u> and recorded on CPOMS. A CPOMS record should be a clear and comprehensive summary of the concerns. It should provide details of how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcome.

12.7 Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from the relevant Children's Services department, as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.

12.8 If, at any point, there is a risk of immediate serious harm to a pupil, a referral should be made to Children's Services immediately. Anybody can make a referral in these circumstances. If the pupil's situation does not appear to be improving, the staff member with concerns should press for reconsideration by raising concerns again with the DSL and/or the Master. Concerns should always lead to help for the pupil at some point.

12.9 Staff should always follow the reporting procedures outlined in this policy in the first instance.

12.10   However, they may also share information directly with Children's Services, or the Police if the situation is an emergency, and the DSL, the DDSL and the Master are all unavailable or they are convinced that a direct report is the only way to ensure the pupil's safety.

12.11   Any member of staff who does not feel that concerns about a pupil have been responded to appropriately, and in accordance with the procedures outlined in this policy, should raise their concerns with the Master or the safeguarding Members of Council. If any member of staff feels the situation has not been addressed appropriately, they should contact Wiltshire SVPP (Appendix 1).

13 Safeguarding and promoting the welfare of children is everyone's responsibility

13.1 Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interest of the child.

13.2 No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

14 Indicators of abuse and neglect

14.1 **Abuse:**

14.1.1   is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult (or adults) or by another child (or children).

14.2 **Physical abuse:**

14.2.1   is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical

harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

14.3 **Emotional abuse:**

14.3.1 is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

14.4 **Sexual abuse:**

14.4.1 involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and the College policy and procedures for dealing with it.

14.5 **Neglect:**

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

14.5.2 All staff have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

15 Specific Safeguarding issues (See Appendix 3 and KCSIE Annex B)

15.1 **Contextual safeguarding**

15.1.1 The College recognises that safeguarding incidents and/or behaviours can be associated with factors outside the College environment and/or can occur between children outside

the College. This is known as contextual safeguarding. It is key that all College staff understand the definition of contextual safeguarding and consider whether children are at risk of abuse or exploitation in situations outside their families. Through training the College will ensure that staff and volunteers are aware that extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. When reporting concerns, staff should include as much information and background detail as possible so the DSL can make a referral with a holistic view of the child. This will allow any assessment to consider all the available evidence and the full context of any abuse.

15.1.2 The College recognise that children with special educational needs and/or disabilities (SEND) can face additional safeguarding challenges and these are discussed in staff training. These additional barriers can include:

15.1.2.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;

15.1.2.2 children with SEN and disabilities can be disproportionally impacted by things like bullying, without outwardly showing any signs;

15.1.2.3 communication barriers and difficulties in overcoming these barriers.

15.1.3 The College recognises that a previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children who are a particularly vulnerable group.

15.2 Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE): County Lines and serious violence

15.2.1 Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. 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. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

15.2.2 The College recognises that CSE is a form of child sexual abuse and this imbalance of power coerces, manipulates or deceives a child or young person into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator. CSE does not always include physical contact; it can also occur through the use of technology. The College understands that some children may not realise they are being exploited e.g. they may believe they are in a genuine romantic relationship.

15.2.3 The College understands that criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs.

15.2.4 The College understands that 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. The College will treat these children as victims understanding that they have been criminally exploited even if the

activity appears to be something they have agreed or consented to. The College recognises the experience of girls who are criminally exploited can be very different to that of boys and that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

15.2.5 Staff are aware of the indicators and risk factors which may signal a child is vulnerable to or involved with serious violent crime. See the Home Office's Preventing youth violence and gang involvement and Criminal exploitation of children and vulnerable adults: county lines guidance for more information.

15.2.6 If a child is suspected to be at risk of or involved in county lines, a referral to the appropriate Children's Services will be made alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

15.3 So-called 'honour-based' violence (including Female Genital Mutilation (FGM) and Forced Marriage)

15.3.1 The College recognises that our staff are well placed to identify concerns and take action to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' violence (HBV), and the College provides guidance on these issues through our safeguarding training. If staff have a concern regarding a child who might be at risk of HBV, they should inform the DSL who will activate local procedures.

15.4 Preventing radicalisation and extremism

15.4.1 We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. We will ensure that, through training, staff, volunteers and members of Council have an understanding of what radicalisation and extremism are, why we need to be vigilant in the College and how to respond when concerns arise.

15.4.2 There are systems in place for keeping pupils safe from extremist material when accessing the internet in the College by using effective filtering and usage policies.

15.4.3 The DSL will act as the point of contact for any concerns relating to radicalisation and extremism. There is an Assistant DSL who is a member of the security team who takes a lead in preventing radicalisation and extremism and liaises with the Local Authority as required and disseminates information to staff as appropriate.

15.4.4 There is a Prevent risk assessment in place which is updated at least annually.

15.4.5 The DSL will make referrals and will represent the College at Channel meetings as required.

15.4.6 Through our curriculum, we will promote the Spiritual, Moral, Social and Cultural development of pupils (SMSC).

15.5 Child-on-child abuse

15.5.1 Allegations against pupils should be reported in accordance with the procedures set out in this policy. If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part Five of KCSIE 2023 and take into account the local response of the Police and Children's Services to these issues. The views of the alleged victim will be taken into account but will not be determinative.

15.5.2 All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed.

Appropriate support will be provided to all pupils involved, including support from external services as necessary.

15.5.3   All staff should recognise that children are capable of abusing other children (including online). All staff should be clear about the College's policy and procedures with regard to child-on-child abuse.

15.5.4   The College is clear that there is a zero-tolerance approach to abuse, and it should never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

15.5.5   There are different forms of child-on-child abuse, such as:

15.5.5.1   bullying (including cyberbullying, prejudice-based and discriminatory bullying);
15.5.5.2   abuse in intimate personal relationships between children (also known as teenage relationship abuse);
15.5.5.3   physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
15.5.5.4   sexual violence and sexual harassment. Part five of the KCSIE (2023) guidance sets out how schools and colleges should respond to reports of sexual violence and sexual harassment;
15.5.5.5   consensual and non-consensual sharing of nude and semi-nude images and/or videos;
15.5.5.6   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;
15.5.5.7   up-skirting (which is a criminal offence), 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
15.5.5.8   initiation/hazing type violence and rituals.

15.6 **The management of allegations of sexual harassment and sexual violence**

15.6.1   Sexual harassment and sexual violence can occur between children of any age and sex. Sexual harassment and sexual violence exist on a continuum and may overlap. This type of abuse can occur both online and/or face to-face (both physically and verbally) and is never acceptable. Incidents can occur between pupils who attend the College, or may include pupils from other schools.

15.6.2   All staff must maintain an attitude of *'it could happen here'* in regard to all safeguarding issues, including sexual violence and sexual harassment. Staff must also act to address any inappropriate attitudes or behaviours in regard to topics of a sexual nature. Early intervention has been shown to be an important step in the prevention of future harmful, abusive and/or violent behaviours.

15.6.3   If a pupil discloses an incident of sexual harassment or sexual violence to a member of staff, it can be difficult to manage both for staff and the pupil.

15.6.4   In cases where sexual harassment or sexual violence are concerned it is imperative that staff reassure the pupil they have done the right thing by speaking out. Best practice dictates that two members of staff should be present (one of whom should ideally be the DSL) when dealing with a disclosure of this kind, however the College appreciate that this may not always be possible.

15.6.5 Once a disclosure of sexual harassment or sexual violence has been received, there are four possible next steps that the DSL will undertake depending on their assessment of the situation:

15.6.5.1 **Manage internally**. One-off incidents where the College does not believe that the pupils (victim/s and/or perpetrator/s) are in need of early help or statutory intervention. Incidents of this nature will be dealt with in line with the College's Behaviour Management Policy.

15.6.5.2 **Early help.** Incidents of non-violent Harmful Sexual Behaviours (HSB). Early help could include therapeutic services provided by the College or other interventions provided by the pupil's local authority.

15.6.5.3 **Referral to children's social care**. All incidents where a child has been harmed or is at risk of harm will be referred to children's social care, next steps will then be decided by the relevant social care staff.

15.6.5.4 **Referral to the Police**. All allegations of rape, assault by penetration or sexual assault will be reported to the Police as well as to children's social care. Some allegations of sexual harassment will also be reported to the Police depending on the nature of the concern. Next steps will be discussed and arranged with the police.

15.6.6 Confidentiality cannot be promised. If the victim does not give consent to share, the College can still lawfully share the information in order to protect the pupil. Parents of the victim and/or perpetrator should always be informed unless this would put the pupil at greater risk.

15.6.7 Where a decision has been made to manage internally, provide early help or refer to children's social care a risk assessment will be completed. In cases of sexual violence, a risk assessment will be completed as standard as part of the management of the allegation.

15.6.8 Risk assessments will consider:

15.6.8.1 The needs of the victim, their protection, support and their views on how best to manage the situation.

15.6.8.2 Potential other victims, including those who do not attend the College.

15.6.8.3 The alleged perpetrator, their needs and their opportunity to potentially offend again.

15.6.8.4 Other pupils and College staff, actions that may help protect them from the alleged perpetrator or future harm.

15.6.9 At all times during the process of managing an allegation of sexual harassment or sexual violence the wishes and needs of the victim will be central to any decisions made. The College will balance the victim's wishes and needs with their statutory duties and will take care to explain any action that contradicts the wishes of the victim appropriately.

15.6.10 In cases where the alleged perpetrator attends the College reasonable steps will be taken to safeguard and support the alleged perpetrator, taking into account their specific needs and if appropriate, their wishes. This will be balanced with the College's statutory duties as well as the needs of the victim.

15.6.11 The College will work in partnership with other agencies, including other educational settings to support all children involved.

15.6.12 Any required disciplinary measures will be taken in accordance with the College's Behaviour Management Policy and the Countering Bullying Policy. In cases where there has been Police involvement, care will be taken to not jeopardise any ongoing Police investigations.

15.6.13 Where the criminal process has been undertaken, the College will act depending on the outcome of the proceedings. In cases where there has been a conviction or caution and the perpetrator remains at the College, the College will set clear expectations for the perpetrator, including contact with the victim. If the alleged perpetrator is found not guilty the College will support the victim and the alleged perpetrator.

15.7 Sexual activity between pupils

15.7.1 As a condition of membership of the College, pupils are expressly forbidden to engage in explicit sexual relations. The College encourages pupils who have been the victims of harm to talk to a member of staff. Where a victim has raised an allegation of sexual assault or violence, the Master will consider the case with the DSL and an exemption to disciplinary processes may be made.

15.7.2 The intervention of child protection agencies in situations involving sexual activity between children can require difficult professional judgments. Some situations are statutorily clear – for example, a child under the age of 13 cannot consent to sexual activity (the age of consent is 16); sexual intercourse without consent is rape (as defined in law); creating or sharing sexual images or videos of under 18s is illegal, including children making or sharing these themselves. Up-skirting is a criminal offence and must be reported to the Police.

15.7.3 It will not necessarily be appropriate to initiate safeguarding procedures where sexual activity involving children and young people below the age of legal consent (16 years) comes to the notice of the College. Decisions about whether or not to refer a matter to Children's Services will be made on a case-by-case basis, and always following an assessment of the extent to which a child is suffering or is likely to suffer significant harm.

15.8 Modern Slavery

15.8.1 The College understands that 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. The College refers to the DfE guidance 'Modern slavery: how to identify and support victims for concerns of this nature'.

15.9 Safeguarding responses to children who go missing or who are absent from education, particularly on repeat occasions and/or prolonged periods

15.9.1 Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. The College's response to persistently absent pupils missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future.

15.10 Mental Health

15.10.1 All staff are made aware, through training, that mental health problems can, in some cases, be an indicator that a pupil has suffered or is at risk of suffering abuse, neglect or exploitation. Staff 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.

15.10.2 The College understands that where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Therefore, through training, staff are aware of how children's experiences can impact on their mental health, behaviour and education. All staff are aware that if they have a mental health concern about a pupil that is also a safeguarding concern, they should take immediate action by passing the information on to the DSL.

15.10.3 The College has a named Mental Health Lead (see page 7 of this document). There are clear systems and processes in place for identifying possible mental health problems and the College will work with other agencies, as required, to respond to these concerns.

16 Online Safety

16.1.1 All staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face-to-face. The College understands that in many cases abuse will take place concurrently via online channels and in daily life. The College knows that children can also abuse other children online. This can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography.

16.1.2 As part of the requirement for staff to undergo regular updated safeguarding training, online safety training is also delivered. The College will ensure online safety is a running and interrelated theme throughout the curriculum and is reflected in relevant policies, teacher training, the role and responsibilities of the DSL and any parental engagement.

16.1.3 It is essential that pupils are safeguarded from potentially harmful and inappropriate online material. Wi-Fi monitoring is in place and data regularly shared with the DSL. An effective, whole College approach to online safety empowers the College to protect and educate pupils and staff in their use of technology and establishes mechanisms to identify, intervene in and escalate any concerns where appropriate.

16.1.4 The College has in place appropriate filtering and monitoring on school devices and school networks with logs shared with the DSL at least weekly.

16.1.5 The College has a clear policy on the use of mobile and smart technology, which reflects the fact most pupils have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some pupils, whilst at the College sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. These issues are all reported to the DSL and managed under safeguarding and child protection procedures and the disciplinary policy.

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

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

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

16.1.6.3   **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and / or pornography), sharing other explicit images and online bullying; and

16.1.6.4   **commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If pupils or staff are at risk, it should be reported to the Anti-Phishing Working Group.

16.2 Cybercrime

16.2.1   The College understands that 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).

16.2.2   If there are concerns about a pupil in this area, the DSL will consider a referral to the Cyber Choices programme which 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.

16.3 Sextortion

16.3.1   Sextortion is a form of online blackmail, whereby the perpetrator threatens to expose sexually intimate images of the victim online unless their demands are met. Typical demands include sexual favours, more sexual images/videos (or acts on webcam) and money. Whilst sextortion generally involves some form of imagery, it can also involve threatening to release sexually explicit messages previously sent by or to the victim.

16.3.2   Sextortion can sometimes be likened to what is commonly called 'revenge porn'. This involves the online distribution of sexually intimate images or videos featuring the victim, usually by a former intimate partner who wants to take 'revenge', 'punish' and 'humiliate' the victim for ending the relationship. However, where this former partner threatens to release images unless the victim agrees to their demands, then this also becomes sextortion. Demands can include prolonging the relationship or requests for sexual acts. This could also amount to stalking.

16.4 Domestic Abuse

16.4.1   All staff are aware that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. The College understands that children can be victims of domestic abuse, and this can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

16.5 Children with special educational needs and disabilities or physical health issues

16.5.1   The College recognises that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges such as:

16.5.1.1   assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;

16.5.1.2   these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;

16.5.1.3   the potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and

16.5.1.4   communication barriers and difficulties in managing or reporting these challenges.

16.5.2   The College works to address these additional challenges and consider extra pastoral support and attention for these pupils, along with ensuring any appropriate support for communication is in place.

16.6 Children who are lesbian, gay, bi or trans (LGBTQ+)

16.6.1   The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, in line with Keeping Children Safe in Education 2023 (KCSIE), the College recognises that children who are LGBTQ+ or those perceived by other children to be LGBTQ+ could potentially be more vulnerable, and therefore the College works to reduce any additional barriers faced. The College provides a safe space for these pupils to speak out or share their concerns with members of staff. Through our curriculum, the College counters homophobic, biphobic and transphobic bullying and abuse.

16.7 Safeguarding international pupils

16.7.1   The College is aware of its safeguarding responsibilities in respect of pupils from overseas who are sponsored by the College via the Child Student Route (a study visa). Specifically, these duties require that:

16.7.1.1   Policies and procedures must be in place to ensure the safety, wellbeing and protection from exploitation of sponsored students;

16.7.1.2   All teaching and boarding sites must meet legally required standards;

16.7.1.3   All staff who have access to pupils must have a current DBS.

16.7.2   This policy therefore covers all pupils at the College, including those here temporarily on exchange visits.

16.7.3   The College recognises the particular vulnerabilities of pupils living in a different country/culture, with possible language barriers and no family close by and provides relevant support where necessary.

17   Records and Information Sharing

17.1 CPOMS is the electronic recording system used by the College to record all safeguarding and child protection information. All staff have access to the system and should contact the DSL if they

require assistance. There are varying access rights to the system to ensure that sensitive information is only shared with those who require it.

17.2 If staff are concerned about the welfare or safety of any pupil they will record this on CPOMS or report directly to the DSL. Any concerns should be recorded or passed to the DSL without delay.

17.3 Concerns are summarised and categorised to gather useful themes and trends. These categories provide clear and comprehensive summaries of all the concerns along with details of how each was followed up, any action taken, the decisions reached and the subsequent outcome.

17.4 Transfer records, records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored on CPOMS.

17.5 When a pupil leaves the College to attend another school/college, the DSL will contact the DSL at the new school/college and will ensure that the child protection file is forwarded to the receiving school/college. This will be within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The College recognises that not providing information as per the timescales can impact on the child's safety, welfare and educational outcomes.

17.6 Prior to a pupil leaving the College will consider if it would be appropriate to share any additional information with the new school/college in advance to help them put in place the right support to safeguard this pupil.

17.7 Where a parent elects to remove their child from the College to home educate, the College will make arrangements to pass any safeguarding concerns to the relevant Children's Services.

17.8 When new pupils join the College, parents and carers will be informed that the College has a safeguarding policy. A copy will be provided to parents on request and is available on the College website. Parents and carers will be informed of our legal duty to assist colleagues in other agencies with child protection enquiries and what happens should the College has cause to inform Children's Services.

17.9 The College is committed to working with parents positively, openly and honestly. The College ensures that all parents are treated with respect, dignity and courtesy. The College respects parents' rights to privacy and confidentiality and will not share sensitive information unless the College has permission, or it is necessary to do so in order to safeguard a child from harm.

17.10   The College will seek to share with parents any concerns the College may have about their child *unless* to do so may place a child at increased risk of harm. A lack of parental engagement or

agreement regarding concerns the College has about a child will not prevent the DSL making a referral in those circumstances where it is appropriate to do so.

17.11   In order to keep children safe and provide appropriate care for them, the College requires parents to provide accurate and up to date information regarding:

17.11.1 full names and contact details of all adults with whom the child normally lives;

17.11.2 full names and contact details of all persons with parental responsibility (if different from above);

17.11.3 emergency contact details of at least one person in addition to the above.

17.11.4 The College will retain this information on the pupil's file. The College will only share information about a pupil with adults who have parental responsibility for the pupil or where a parent has given permission and the College has been supplied with the adult's full details in writing.

18   Reporting obligations

18.1 Staff should maintain an attitude of *"it could happen here"* where safeguarding is concerned. When concerned about the welfare of a pupil, staff members should always act in the best interests of the pupil.

18.2 All staff have a duty to:

18.2.1   report any concerns they may have about the safety and/or well-being of pupils;

18.2.2   report any concerns they may have about the safety and/or well-being of other persons associated with the College;

18.2.3   report any safeguarding concerns about staff or anyone else associated with the College; and

18.2.4   follow up on any such reports to ensure that appropriate action is or has been taken.

18.3 The procedures for doing so are set out below. If staff are unsure about the appropriate process to use, they should not hesitate to speak to the DSL, a member of the Management Team or

directly to Children's Services (whether the College's local authority or that local to the child's home address), or the Police in their absence, for guidance.

18.4 What to do if staff have a concern about a pupil's welfare

18.4.1   If staff have any concern about a pupil's welfare, they should report their concern to the DSL (or the DDSL in the DSL's absence) immediately.

18.4.2   The contact details for the DSL and DDSL are set out in the key contacts list at the front of this policy.

18.4.3   A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support, to an emerging problem or to a potentially unmet need, or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989.

18.4.4   Teachers must report known cases of female genital mutilation (FGM) to the Police and the DSL. All other staff should refer FGM concerns to the DSL.

18.4.5   If the concern involves an allegation or concern raised about a member of staff, supply staff, contractors or volunteers this must be reported in accordance with the procedures set out in KCSIE 2023.

18.5 What if the DSL is unavailable?

18.5.1   The DSL or the DDSL should always be available to discuss safeguarding concerns and may be contacted on their mobile phones in relation to any safeguarding concerns out of College hours.

18.5.2   If in exceptional circumstances the DSL and DDSL are unavailable, staff must not delay taking action. Staff should speak to their line manager or a member of the Management Team and/or advice should be taken from Children's Services.

18.5.3   Where a child is suffering, or is likely to suffer, from harm, a referral to Children's Services and/or the Police should be made immediately. Staff should be aware of the process for

making referrals direct to Children's Services and/or the Police in these circumstances. See below for further details on making a referral.

18.5.4   Any action taken by a member of staff pursuant to this requirement should then be shared with the DSL or DDSL, or a member of the Management Team as soon as is practically possible.

18.6 **Action by the DSL**

18.6.1   On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the Wiltshire Safeguarding Vulnerable People Partnership or relevant Children's Services procedures and referral threshold document. Such action may include:

18.6.2   managing any support for the pupil internally via the College's own pastoral support processes, seeking advice from Children's Services where required;

18.6.3   undertaking an early help assessment (which generally requires parental consent); or

18.6.4   making a referral for statutory services.

18.6.5   The views of the child will be taken into account when considering the appropriate course of action but will not be determinative.

18.6.6   Where the concern relates to the welfare of a pupil who is aged 18 or over, the DSL will consider whether it is necessary to refer such concerns to the Safeguarding Adults Board rather than, or in addition to, Children's Social Care.

18.6.7   If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving.

18.7 **Managing support for pupils internally**

18.7.1   The College has a framework for the identification, assessment, management and review of risk to pupil welfare, so that appropriate action can be taken to reduce the risks identified.

18.7.2   The College will ensure that appropriate advice and consultation is sought about the management of safeguarding issues, including advice from Children's Services where necessary.

18.8 **Early help/ Early Support Assessment**

18.8.1   Early help, also known as early intervention, is support given to a family when a problem first emerges. It can be provided at any stage of a child or young person's life to parents,

children or whole families, and is generally supported by Children's Services in consultation with the family.

18.8.2　The College understands that providing early help is more effective in promoting the welfare of children than reacting later.

18.8.3　The College's safeguarding training includes guidance about early help processes and prepares all staff to identify children who may benefit from early help. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges.

18.8.4　A member of staff who considers that a pupil may benefit from early help should in the first instance discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the Wiltshire Safeguarding Vulnerable People Partnership menu of early help services and their referral threshold document and will support staff in liaising with other agencies and setting up an inter-agency assessment as appropriate. If early help is appropriate, staff may be required to support parents and other agencies and professionals in an early help assessment and will be supported by the DSL in carrying out this role. In some cases, College staff may be required to take a lead role.

18.8.5　The matter will be kept under review and consideration given to a referral to Children's Services for assessment for statutory services if the pupil's situation appears to be getting worse or does not appear to be improving.

18.9 Making a referral

18.9.1　Where a child is suffering, or is likely to suffer from harm, a referral to Children's Services (and if appropriate the Police) should be made immediately.

18.9.2　Harm is the ill treatment or impairment of the health or development of a child. Seeing or hearing the ill treatment of another person is also a form of harm. It can be determined "significant" by "comparing a child's health and development with what might be reasonably expected of a similar child.

18.9.3　Referrals may be required to the Wiltshire Children's Services team and / or the pupil's local Children's Services team.

18.9.4　Anyone can contact Children's Services to discuss concerns before a referral is made. This includes professionals as well as a child themselves, family members and members of the

public. The child's local safeguarding partnership will have a threshold of need framework and guidance which will provide more information which can support decision making.

18.9.5 The DSL will follow the Wiltshire SVPP escalation policy if they consider it appropriate to escalate a referral which has not been accepted or acted on.

19 Statutory assessments

19.1 Children's Services may undertake a statutory assessment under the *Children Act 1989* into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:

19.2 Children in need: *A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.* Children in need may be assessed under section 17 of the Children Act 1989.

19.3 Children suffering or likely to suffer significant harm: Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that *a child is suffering, or is likely to suffer, significant harm.*

19.4 Staff will need to have access to certain information about the pupil and the safeguarding concern in order to make the referral. In general terms, this information will comprise:

19.4.1 personal details of the pupil including the pupil's developmental needs;

19.4.2 detailed information about the concern;

19.4.3 information about the pupil's family and siblings including the capacity of the pupil's parents or carers to meet the pupil's developmental needs and any external factors that may be undermining their capacity to parent.

19.4.4 If the referral is made by telephone, this should be followed up in writing.

19.4.5 If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

19.4.6 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not

received, the DSL (or the person that made the referral) should contact Children's Services again.

19.4.7 Following a referral, if the pupil's situation does not appear to be improving, the local escalation procedures should be followed to ensure that the concerns have been addressed and that the pupil's situation improves.

19.5 **Extra-familial harm**

19.6 Safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between children outside the College.

19.7 All staff, including the DSL, should consider the context within which such incidents and/or behaviours occur, for example where wider environmental factors are present in a pupil's life that may be a threat to their safety and/or welfare, and should record these appropriately.

19.8 Children's Services should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.

19.9 Extra-familial harm: all staff, but especially the DSL, should consider whether pupils are at risk of abuse 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 exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

19.10 **Where a pupil is to be interviewed by the Police**

19.11 There may be allegations of abuse against a child where it is necessary for a pupil to be interviewed by the Police. In such cases parents will be informed as soon as possible unless the College is otherwise advised by the Local Authority or Police.

19.12 In the case where a pupil's parents are abroad, the pupil's Guardian will be requested to provide support to the pupil.

19.13 The College recognises that it is a requirement for children to have an Appropriate Adult when in contact with Police Officers who suspect them of an offence in accordance with the procedures outlined in this policy. The threshold for dealing with an issue of pupil behaviour under the safeguarding policy is when there is a reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. The College will take advice from Children's Social Care on the investigation of such allegations and will take appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse. If the matter does not reach the threshold for referral or if there is no intervention by Children's Services or Police, the College

may nonetheless act in relation to the allegation in accordance with its own Behaviour Management Policy and / or the parent contract.

19.14   Risk assessment

19.15   Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

19.16   The format of risk assessment may vary and may be included as part of the College's overall response to a welfare issue, including the use of individual pupil welfare plans. Regardless of the format used, the College's approach to promoting pupil welfare will be systematic and pupil focused.

19.17   The Master has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.

19.18   Day-to-day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

19.19   Informing parents

19.20   Parents will normally be kept informed, as appropriate, of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Master, the DOFA (LADO), Children's Services, the Police and/or the pupil before discussing details with parents.

19.21   In all cases, the DSL will be guided by the Wiltshire Safeguarding Vulnerable People Partnership referral threshold document.

19.22   What to do if staff have a safeguarding concern about someone else's welfare

19.23   Staff who have safeguarding concerns about the welfare of others, or any other safeguarding issue not expressly covered by this policy, should report it.

19.24   In the absence of an express procedure about reporting, staff should report such concerns to their line manager or the DSL in the first instance.

19.25   Allegations made and/or concerns raised about staff and others in the College

19.26   The College has procedures for dealing with allegations and low-level concerns made and/or concerns raised about staff or anyone working in the College, including temporary staff, volunteers and contractors. These are available on the College intranet (Firefly) or on request.

19.27   The procedures apply to staff who pose a risk of harm to children or may behave in a way that indicates that they may be unsuitable to work with children. They also apply to low-level concerns that do not meet the harms threshold. The procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff from malicious, false, unsubstantiated or unfounded allegations. The College will follow its employment procedures for

dealing with any other safeguarding concern raised about staff, involving external agencies as appropriate.

19.28   Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of the College in relation to contact with pupils, parents, colleagues and any other person who comes into contact with the College. This guidance is the Staff Code of Conduct and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.

19.29   **Additional reporting**

19.30   In addition to the reporting requirements explained above, the College will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:

19.31   **Charity Commission.** The College is a registered charity and will report all serious incidents to the Charity Commission promptly in accordance with the guidance.

19.32   **Disclosure and Barring Service** (**DBS**). A referral to the DBS will be made promptly if the criteria are met.

19.33   **Teaching Regulation Agency** (**TRA**). Separate consideration will be given as to whether a referral to the TRA should be made where a teacher has been dismissed or would have been dismissed if he/she had not resigned.

19.34   **Insurers.** The College will consider whether it is necessary to report a safeguarding incident to the relevant insurers and/or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.

19.35   Care should be taken to ensure this is done before renewal to ensure that the College complies with its duties under the Insurance Act 2015. If the College is in any doubt with regard

to the correct insurer and/or policy and/or if it is unable to locate the relevant insurer, professional advice should be sought.

19.36   **Boarding Schools Association** (**BSA**). The College will report safeguarding matters to the BSA as required by their Commitment to Care Charter.

20 UK Visas and Immigration

20.1 In the event that a pupil holding a Student or Child Student visa sponsored by the College under the Points Based System goes missing, the College will report to UKVI if the pupil misses ten consecutive expected contact points.

20.2 Each time the College's attendance register is completed it is treated as a contact point for these purposes.

20.3 The report will be made by the College's Level 1 user via the Sponsor Management and in accordance with prevailing UKVI guidance.
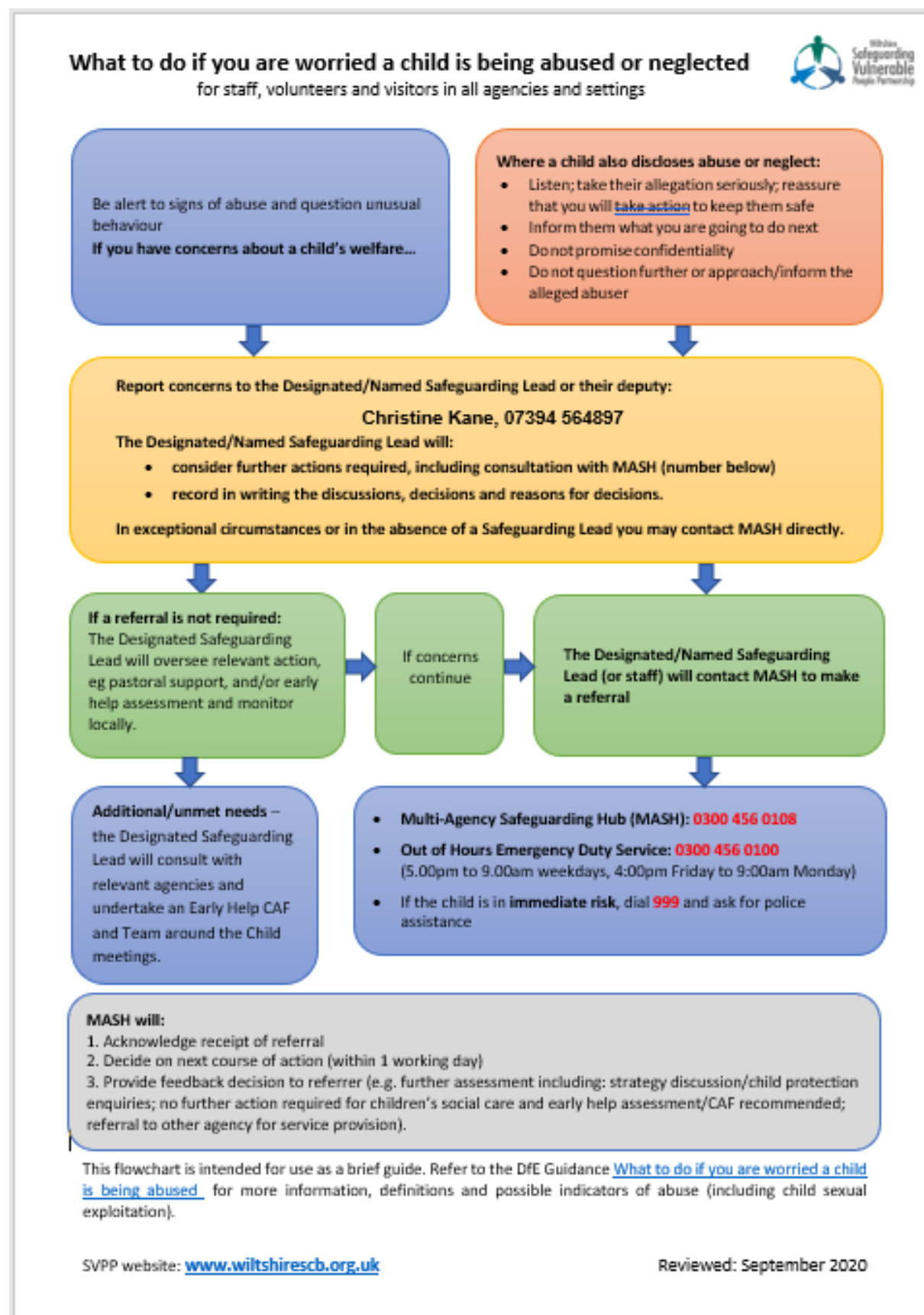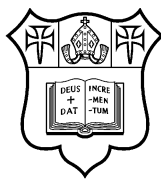
21 Use of premises for non-College activities

21.1 Where the College hires or rents out its facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) the College ensures that appropriate arrangements are in place to keep children safe.

21.2 The College will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school or college on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll or attend the College. The College will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

21.3 The College may receive an allegation relating to an incident that happened when an individual or organisation was using their premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the College will follow the safeguarding policies and procedures, including informing the LADO (DOFA).

22 Version control

Author:	Director of Safeguarding
Approved by:	Chairman of Council
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Circulation:	College website, A-Z Policies, Firefly

Appendix 1   Wiltshire SVPP Flow chart

What to do if you are worried a child is being abused or neglected
for staff, volunteers and visitors in all agencies and settings

Be alert to signs of abuse and question unusual behaviour

If you have concerns about a child's welfare...

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

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

Christine Kane, 07394 564897

The Designated/Named Safeguarding Lead will:
- consider further actions required, including consultation with MASH (number below)
- record in writing the discussions, decisions and reasons for decisions.

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

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

If concerns continue

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

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

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

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

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

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

MARLBOROUGH COLLEGE

Safeguarding for Pupils

Marlborough College is committed to safeguarding and promoting the welfare of pupils and expects all staff, volunteers and visitors to share in this commitment. The College actively listens to all pupils and always take seriously what they tell us. Our aim is for all pupils to enjoy their time at the College and feel safe and secure.

Mrs L Moelwyn-Hughes
The Master

Introduction

Protecting the safety and welfare of pupils is important to us and the College works hard to make you feel safe, valued and respected. The College expects everyone who works at the College to help us achieve this and to follow our safeguarding policy. https://www.marlboroughcollege.org/safeguarding/

Safeguarding is the work the College does to look after your welfare and keep you safe from harm.

This guide explains:
- What the College does to keep pupils safe from harm and being mistreated.
- What the College expects from people who work at the College and what you can expect from them.
- What abuse, bullying and safeguarding concerns mean.
- What you should do if you are feeling worried or unsafe, or if you are worried about someone else.

Your Rights:
- You have a right to be kept safe on and offline.
- You have the right to healthy relationships and appropriate boundaries.
- You have the right not to be bullied, harassed or intimidated.
- You have the right to feel safe.
- You have the right not to be discriminated against.
- You have the right to be taught to protect yourself and how to stay safe.
- You have the right to be told how to get help if you need it.

How do we keep you safe?

- Safeguarding is everyone's responsibility at Marlborough College and the College has a Safeguarding and Pastoral Team to support and advise you.
- The College makes sure people who work for us understand our safeguarding policy and their responsibilities.
- The College empowers everyone to protect themselves and others.
- The College creates a safe environment to ensure that you have an enjoyable experience.
- The College makes sure that the College only works with people and organisations who also believe in keeping children and young people safe.

- The College takes action when the College finds out that anyone has been abused, bullied or mistreated.

The people who work for us must never:

- Threaten, frighten, embarrass, humiliate, mistreat or bribe anyone.
- Develop inappropriate personal relationships with pupils.
- Invite you to their home, or the home of someone else they know without the permission of your HM.
- Send you personal emails or text messages, make personal calls to you or chat to you online using personal accounts. All communication must be professional and within professional boundaries.
- Have 'favourite' pupils. It is unfair to others when the same person is always chosen for special things. Everyone must be treated equally all the time.
- Give you personal gifts. Staff can give rewards for things like good behaviour or great achievements but this can only happen with others around and the reasons for the reward must be clearly explained to everyone.
- Help you with doing things like washing, showering, dressing or looking after your body. Everyone needs respect and private space to do these things.
- Touch your body inappropriately. There are times when touch is ok, like to help you if you have had an accident or injury, or to show you how to do something safely. You should never feel uncomfortable.
- Take or share photos or videos of you without you and your parents' or guardian's permission.

What does abuse and bullying mean?

It is important for you to understand what abuse and bullying are so that you know if it is happening to you or someone else. It is also important to tell someone if abuse, bullying or any other safeguarding concerns explained in this section are happening to you or someone else.

Physical abuse is when someone hurts or injures you or another person on purpose.

Sexual abuse is when someone is forced, pressurised or tricked into taking part in any kind of sexual activity with another person. This can happen in person or online.

Emotional abuse is when someone always puts you down, shouts at you, ignores you, says or does things that make you feel bad about yourself, tries to control you or put pressure on you to do things you're not ready to do, stops you from having friends or when someone is aggressive and violent to other people in your family and you keep seeing it.

Neglect is when you don't get the help and care you need from someone who is supposed to be looking after you and keep you safe, for example, not getting important things you need at home like love, care and attention, warm clothes, enough to eat and drink, or medicine when you are ill.

Bullying is repeated negative behaviour that is intended to make someone feel upset, uncomfortable or unsafe.

Discrimination is when someone treats you differently or unfairly because you are different to them. You should be treated in the same way as everyone else - no matter who you are, where you come from, who you love or what you believe in.

Grooming is when someone builds a relationship with another person, and sometimes their family, to gain their trust to take advantage of them or abuse them. Grooming can happen online and in person. **Radicalisation** is when someone starts to believe or support extreme views. Anybody, from any background can become radicalised. The concern is when somebody with an extreme view acts or intends to act upon their views in a way that is harmful to themselves or others.

Gangs can be a group of mates who hang around together. Hanging out with your friends can be a good way to get to know each other and share hobbies and interests. But it can become dangerous if you join a gang that does illegal things. Sometimes gangs are violent and might fight other gangs, carry weapons, carry or sell drugs.

Peer-on-Peer or Child-on-Child abuse can include bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between peers; physical abuse; sexual violence, such as rape, assault by penetration and sexual assault; sexual harassment; non-consensual sharing of nudes and semi-nudes images and/or videos; causing someone to engage in sexual activity without consent; up-skirting; and initiation/hazing type violence and rituals.

Asking for help
If you have a problem, or are worried about something, it is always best to speak to an adult you trust. It can be difficult to find the right words so here are some tips to help make it a bit easier.

Start Somewhere
You do not have to share everything all at once. Say what comes to mind, it is okay if it does not come out perfectly. Telling someone is the most important thing. Speak with an adult you trust, someone that makes you feel safe and listened to. Some children and young people find it easier to write it down and share it with a trusted adult.

The adult may need to ask you questions about what you have written down but remember this is because they want to make sure they understand clearly, and it is not because they do not believe you. When you tell someone, they may need to tell other people to help keep you safe, but they should tell you who they are going to tell and why.

Who can I talk to?
You can talk to any member of staff including your House Team, College Counsellor or a member of the Pastoral Team.

You can contact Christine Kane, the Director of Safeguarding on 01672 892519 or 07394 564897 or by emailing ckane@marlboroughcollege.org.

Your information is only shared with people who need to know to keep you safe. Anything you tell us will be stored securely.

Or you can contact any of the following:
- NSPCC: nspcc.org.uk/what-you-can-do/report-abuse
- Childline: childline.org.uk Helpline: 0808 800 5000
- CEOP: ceop.Police.uk/ceop-reporting
- ThinkUknow: thinkuknow.co.uk/14_plus
- ChildNet:childnet.com/young-people/secondary
- Samaritans: samaritans.org/how-we-can-help-you
- Young Minds: youngminds.org.uk
- Disrespect Nobody: disrespectnobody.co.uk

Appendix 3   Safeguarding in Specific circumstances/Appendix B KCSIE

1. **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. 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.

2. **Child Criminal Exploitation (CCE)**

The College knows that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. 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, it is important that the child perpetrator is also recognised as a victim. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources. Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;

- associate with other children involved in exploitation;

- suffer from changes in emotional well-being;

- misuse alcohol and other drugs;

- go missing for periods of time or regularly come home late; and

- regularly miss school or education or do not take part in education. Children who have been exploited will need additional support to help keep them in education.

3. **Child Sexual Exploitation (CSE)**

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. Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends;

- suffer from sexually transmitted infections;

- display sexual behaviours beyond expected sexual development;

- become pregnant.

4. 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 are exploited to move, store and sell 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 any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also 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 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;

- 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 and The Children's Society County Lines Toolkit for Professionals.

5. 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. The guides explain each step of the process, 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. This may be useful for some parents and carers.

6. Children who are absent from education

All staff should be aware that children being absent from the College, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation

and 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 female genital mutilation, so called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of the College's unauthorised absence procedures and children missing education procedures

7. **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.

8. **Cybercrime**

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 skills 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 them 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.

9. **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 physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, 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 to parent abuse. Anyone can be a victim of domestic abuse, regardless

of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

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 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.

Operation Encompass: Operation Encompass operates in all Police forces across England. It helps Police and schools work together to provide emotional and practical help to children. The system ensures that when the Police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the Police will inform the key adult (usually the DSL (or Deputy) in school before the child or children arrive at school the following day. This ensures that the school has up-to-date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the Police and/or schools should make a referral to local authority Children's Services if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8am to 1pm, Monday to Friday on 0204 513 9990 (charged at local rate). National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC - UK domestic-abuse Signs Symptoms Effects;

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

- Safe Young Lives: Young people and domestic abuse;

- Domestic abuse: specialist sources of support (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse);

- Home: Operation Encompass (includes information for schools on the impact of domestic abuse on children).

10. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and Deputy) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with

local procedures, this does not, and should not, replace a referral into local authority Children's Services where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority Children's Services will be the lead agency for these children and the DSL (or Deputy) should ensure appropriate referrals are made based on the child's circumstances.

11. **Mental health**

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education. More information can be found in the Mental health and behaviour in schools' guidance, colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children.

12. **Modern Slavery and the National Referral Mechanism (NRM)**

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 NRM is available in Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK.

13. **Preventing radicalisation**

Children are vulnerable to extremist ideology and radicalisation. 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 values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. 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 an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts.

Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. As defined in the Government's Counter Extremism Strategy https://www.gov.uk/government/publications/counter-extremism-strategy. As defined in the Revised Prevent Duty Guidance for England and Wales. https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-

guidance-for-england-andwales. As defined in the Terrorism Act 2000 (TACT 2000) http://www.legislation.gov.uk/ukpga/2000/11/contents Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised.

As with other safeguarding risks, staff should be alert to changes in 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 DSL (or Deputy) making a Prevent referral. Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised. Further information and a list of such indicators can be found at Radicalisation and Extremism - Examples and Behavioural Traits (educateagainsthate.com). All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. The DSL (and Deputy) and other senior leaders in schools should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare).

The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies. The school's or college's DSL (and Deputy) should be aware of local procedures for making a Prevent referral.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. According to the Prevent duty guidance 'having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions. "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act). Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages. The DSL (or 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 or those who are currently receiving support through the Channel programme and have that support in place for when the child arrives.

14. **Sexual violence and sexual harassment between children**

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. 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. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Detailed advice is available in Part five of KCSIE 2023.

15. **Serious Violence Crime**

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from school;

- a change in friendships or relationships with older individuals or groups;

- a significant decline in performance;

- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries;

- unexplained gifts or new possessions which 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.

The likelihood of involvement in serious violence may be increased by factors such as:

- being male;

- having been frequently absent or permanently excluded from school;

- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

16. **So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)**

So-called 'honour'-based abuse (HBA) encompasses incidents or 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. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the DSL (or Deputy). As appropriate, the DSL (or Deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the Police and local authority children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see below).

17. **Female Genital Mutilation (FGM)**

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

FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and Children's Services professionals in England and Wales, to report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may

face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information. Under Section 5B(11)(a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A (1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England). Teachers must personally report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's DSL (or Deputy) and involve local authority Children's Services as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

18. **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk). School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 0207 008 0151 or email fmu@fcdo.gov.uk.