



Safeguarding and Promoting the Welfare of Children

(Child Protection Policy)

Applies to	All students in College and boarding premises
Approved by	I certify I have reviewed this policy and verify that to the best of my knowledge it reflects current legislation. Martin Meenagh (Principal) Countersigned by the Chair of Governors
Annual Review	Reviewed: September 2019 Next review: December 2019

Safeguarding Staff:	
College Designated Safeguarding Lead	Dershna Patel
College Designated Safeguarding Officer (Supporting the lead)	Daliya George & Sally Faulding
Designated Safeguarding Governor	Stephen Mellor
Designated Safeguarding Lead & Officers for Boarding	Paula Southam (DSL), Ben Rogers (DSO)

Colleges and their staff form part of the wider safeguarding system for children. This system is described in statutory guidance '[Working Together to Safeguard Children](#)'.

[Keeping Children Safe in Education \(DfE 2019\)](#) states 'Safeguarding and promoting the welfare of children is everyone's responsibility' (Pp 5). This policy supports all staff in maintaining this responsibility. This policy, part one and Annex A of [Keeping Children Safe in Education 2019](#) forms part of induction for all staff.

For the purpose of this guidance children includes everyone under the age of 18.

Advice and guidance to staff on disclosures and reporting allegations are contained in the appendices to this policy. All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 that may follow a referral, along with the role they might be expected to play in such assessments.

This policy should be read in conjunction with the:

- Behaviour and Expectations Policy
- Anti-Bullying Policy
- College Trips Policy
- Substance Misuse Policy
- Safer Recruitment Policy
- Staff Disciplinary, Grievance and Whistleblowing Policies

Staff will also have due regard to the [Code of Conduct \(Appendix One\)](#) and [Missing Child policy](#) contained within the Safeguarding policy and the [role of the DSL \(Appendix Six\)](#)

And also in conjunction with:

[Keeping Children Safe in Education \(2019\)](#) and [Working Together to Safeguard Children \(2018\)](#)

Rationale

Chelsea Independent College takes very seriously its duty towards all its students who have been entrusted to its care and seeks to provide a College environment where all children are safe, secure, valued, respected, and listened to. All staff have a full and active part to play in protecting students from harm. We believe that our College should provide a caring, positive, safe and stimulating environment which promotes the social, physical and moral development of the individual child.

Introduction

Chelsea Independent College understands that our work in safeguarding and protecting children must always have regard for the national guidance issued by the Secretary of State and should be in line with local guidance and procedures. As a boarding school, Chelsea Independent College is aware of the increased vulnerability of students who live away from home.

Chelsea Independent College fully endorses Safeguarding legislation and government guidance which says that safeguarding means:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children and young people to have the best outcome.

and that: "Everyone who works with children has a responsibility for keeping them safe (Pp 11)... Everyone who comes into contact with children and families has a role to play.(Pp 6)" ([Working Together to Safeguard Children](#) (HM Government 2018))

The aims of Chelsea Independent College Safeguarding Policy are:

- To support each young person's development in ways that will foster security, confidence and independence;

- To raise the awareness of both teaching and support staff of the need to safeguard young people and of their responsibilities in identifying and reporting possible cases of abuse;
- To provide a systematic means of monitoring young people known or thought to be at risk of harm; and to emphasise the need for good levels of communication between all members of staff, as between themselves and with senior management;
- To develop a structured procedure within the College which will be followed by all members of the College community in cases of suspected abuse and to foster an environment and culture where those procedures will be readily invoked;
- To develop and promote effective working relationships with other agencies, especially the police and Social Services;
- To ensure that all adults within our College who have access to children have been subjected to the suitability checks required by the Disclosure and Barring Service and Standard 4 of the Independent School Standards Regulations in respect of their suitability to work with children.

Legal Framework

Chelsea Independent College is aware of its obligation to make arrangements to safeguard and promote the welfare of students at the College as set out in Sections 157 and 175(2) of the Education Act 2002, the statutory guidance documents, [Keeping Children Safe in Education](#) (DfE, 2019).

The College's Designated Safeguarding Lead (DSL), leads safeguarding within the College and will liaise with the appropriate London Safeguarding Children Board (LSCB) as required. The DSL is supported by the Safeguarding Officers who report to the DSL. In line with national minimum standards, and consistent with the LSCB procedures, the College has an appropriate policy on child protection and response to allegations or suspicions of abuse. The policy is known to staff and is made available to parents and other stakeholders on the College website or on request.

Further information on Preventing Radicalisation

From April 2015 the Counter-Terrorism and Security Act places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). The Counter-Terrorism and Security Act 2015 will also place a duty on local authorities to ensure Channel panels are in place. The panel must include the local authority and chief officer of the local police. Panels will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, following a referral from the police and where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Colleges which are required to have regard to Keeping Children Safe in Education are listed in the Act as partners of the panel.

Procedures

Our child protection procedures and procedures for dealing with allegations of abuse are in accordance with locally agreed inter-agency procedures. These procedures are set out in the next pages. [Appendix 2](#) offers a summary for staff on Disclosures and Reporting arrangements and [Appendix 1](#) offers guidance to staff so they do not place themselves or students at risk of harm or risk of allegations of harm. [Appendix 3](#) outlines the definitions and signs of abuse.

Training

All staff are given training at whole College in-service training days at the beginning of every academic year. The training is normally provided by an NSPCC, LSCB and CEOP-trained Safeguarding and Child Protection trainer. It aims to develop staff's understanding of the signs and indicators of abuse and to know how to respond to a student who discloses abuse. All staff who have attended receive a certificate in basic Safeguarding and Child Protection awareness and sign a certification sheet confirming they have read and understood Part 1 and Annex A of the KCSIE (2019). A record of this training is kept in personnel files. The last whole College training in safeguarding was in August 2019 (level 2 Safeguarding).

All new members of staff, temporary staff and volunteers meet with the College's DSL as part of their induction training and are provided with a copy of the College's child protection procedures and are required to read Part 1 and Annex A of the KCSIE (2019). They are informed of the arrangements for child protection, including the procedure for reporting allegations. All new staff also complete a level 2 safeguarding course as part of their induction.

The Safeguarding Officers and DSL attend appropriate DSL training (level 4) run by appropriate training providers and their training is updated every two years, including a refresher after the first year of training.

All staff, including ancillary staff, temporary staff or volunteers, are provided with induction training which includes

1. the College's child protection policy;
2. the staff code of conduct;
3. the identity of the DSL and Safeguarding Officers;
4. a copy of Part 1 and Annex A of KCSIE.
5. online Safeguarding training

Whole College updates on child protection updates or training are also provided regularly.

Early Help for Students (those concerns not considered a safeguarding issue)

The College DSL, the DSL for Kensington Park School, and the DSL for boarding meet weekly to discuss student welfare concerns. All staff can refer a student to this group for discussion. Also any member of this group is available to discuss any student welfare needs and the group work together to highlight students requiring early intervention. This group has access to a range of specialist professionals, such as counsellors, medical services and local authority staff.

The group will make a judgement whether or not a concern has reached the threshold of becoming a safeguarding concern. The Head of Boarding will be responsible to maintaining

records of these meetings. The College DSL will be responsible for any referrals and maintaining a log of such.

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

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

All staff are reminded to be on the look out for indicators of abuse and have due regard to the mantra “it could happen here”. A list of these indicators can be found in [Appendix three](#).

Taking Referrals

If staff have any concerns about a child’s welfare they should act immediately. Staff should report such concerns to the DSL or one of his deputies. Once a referral has been made to the DSL/DSO support can be offered to the pupil concerned. This may take the form of internal support within the College’s pastoral structures or an early help assessment or a referral for statutory services.

Whilst the guidance places the responsibility of making decisions about referrals with the College’s DSL, the importance of children receiving the right help at the right time to address risks and prevent issues escalating and the importance of acting on and referring the early signs of abuse and neglect is such that staff can seek advice or report allegations directly to the Local Safeguarding Children Board. Similarly, staff have the right to contact the LSCB directly if they feel a situation is not improving or to challenge inaction.

In addition, staff should differentiate between children who are in need of additional support from one or more agencies and children who have suffered or are at risk of suffering serious harm. Children who have suffered or are at risk of suffering serious harm must be reported to children’s social care immediately.

Children who are in need of additional support from one or more agencies need to use the CAF (Common Assessment Framework) and “Team Around Child” (TAC) approaches.

Early Help

If early help is appropriate, the DSL (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional.

Informing Parents

Parents are made aware of the responsibilities of staff members with regard to child protection procedures within information provided on joining the College. A copy of this policy is also made available to parents on request and on the College website. This is explained in annual communications to parents.

Safer Recruitment

The College carries out all the required checks on staff in line with guidance laid down in [Keeping Children Safe in Education \(2019\)](#) and [Working Together to Safeguard Children \(2018\)](#), a copy of which is available in the Staff Room or may be downloaded at <https://www.education.gov.uk/publications>. The College's [Safer Recruitment Policy](#) gives details of the pre-employment checks undertaken by the College for the suitability of potential employees to work with children. For more details, please refer to the [Safer Recruitment Policy](#) on the College's website.

Volunteers

Arrangements for volunteers will vary according to whether or not such individuals are defined as being involved in regulated activity (Independent Schools Standards part 4 paragraphs 190, 191 and 192). All volunteers are provided with a copy of this policy (for which they must sign to indicate that they have received and read it) prior to undertaking any activity where they will have access to students (e.g. accompanying College trips) which highlights their responsibilities and the policy as it relates to them. The Designated Teacher responsible for the activity/trip will have regard to the guidance [Keeping Children Safe in Education \(2019\)](#) and consult with the DSL in deciding whether a Disclosure and Barring Service (DBS) Disclosure should be obtained in respect of a volunteer. More details on these requirements can be found in the College Trips Policy on the College's website.

Staff working with College pupils

The College requires appropriate checks to be made on staff employed by other organisations working on the College site and likely to have unsupervised access to children. The College Trips Policy requires trip organisers to check with other organisations (e.g. residential centres, museums) to verify that their employees working with our young people have undergone satisfactory checks on their suitability to work with children.

Allegations against Staff or Volunteers

We are aware that there may be many ways in which an allegation is made:

- a student or member of staff or a volunteer may make an allegation against a member of staff or a volunteer.
- A young person may make the allegation to another student, a parent, a member of staff or a volunteer.

All staff and volunteers must be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues or volunteers. If an allegation is made, the member of staff or volunteer receiving the allegation MUST immediately inform the Principal or, in their absence, the DSL. If a young person informs his or her parent of any such allegation the College reasonably expects that the parent will report the allegation to the College and other appropriate authorities (see [Appendix 5: Useful Contact Numbers](#)), to enable appropriate enquiries to be undertaken.

The Principal (or DSL) will contact the Local Authority designated officer (LADO) immediately to discuss the allegation, consider the nature, content and context of the allegation and agree a course of action including any involvement of the police.

Discussions will be recorded in writing, and communication with both the individual and the parents of the child/children agreed. The College will consider carefully whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. The College will give due weight to the views of the LADO and the policy when making a decision about suspension.

As outlined in Part 4 of KCSIE (2019) if an allegation is made to a member of staff or volunteer concerning the Principal, the member of staff or volunteer will report this to the Chairman of Governors, without informing the Principal, who can be contacted by email. The Chairman of Governors will then discuss the matter immediately with the DSL.

If a disclosure is made to a member of staff or volunteer concerning a member of staff, including a member of the Senior Leadership Team, the member of staff or volunteer will inform the Principal, who will consult with the DSL. In cases of serious harm, the police will be informed from the outset.

When determining the outcome of any allegation the College will take account of whether the allegations are

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

The College will follow the LSCB procedures for managing allegations against staff. In accordance with the guidance issued by the DfE, all considerations and investigations carried out by the College related to an allegation will eradicate any unnecessary delays. The member of staff accused will be informed of the allegation as soon as possible after consulting with the DSL. Suspension of the individual subject to the allegation will not be automatic and will only be applied if there is no reasonable alternative. The reasons and justification for such a decision will be recorded by the College and the individual will be notified of the reasons. Appropriate pastoral care and a named contact will be put in place for any suspended member of staff.

Allegations that are found to be malicious will be removed from personnel records and any that

are unfounded or malicious will not be referred to in employer references. Young people who are found to have made malicious allegations will be subject to the College's Behaviour Policy and, after investigation, sanctions may include temporary or permanent exclusion, in addition to a referral to the Police if there are grounds to believe that a criminal offence has been committed.

If the allegation is against a member of staff in boarding, the College will make arrangements for alternative accommodation away from children in cases where a member of boarding staff is suspended pending an investigation of a child protection nature.

From 1st October 2012, there are restrictions on the reporting or publishing of allegations against teachers and so schools must make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the DfE/TRA publish information about an investigation or decision in a disciplinary case.

The College is committed to promptly reporting to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used and the DBS referral criteria are met.

Independent schools are also under a duty to consider making a referral to the Teaching Regulation Agency and the DBS where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence". Where a referral has been made to the DBS, it is also necessary for a referral to be made to TRA, as the two bodies use different criteria for their respective judgements.

For further information please refer to the TRA document: [Teacher misconduct: the prohibition of teachers](https://www.gov.uk/government/collections/teacher-misconduct): (April 2018) <https://www.gov.uk/government/collections/teacher-misconduct>

Allegations against a member of staff no longer working at CIC will be referred immediately to the police.

Policy Review

Safeguarding procedures are reviewed annually by the DSL with support from the Safeguarding Governor as well as being approved by the Governing body. The College DSL meets termly with the Safeguarding Governor to audit the College's welfare and safeguarding practices and procedures who in turn submits this for the consideration of the governing body. The DSL is responsible for ensuring that any deficiencies or weaknesses in child protection arrangements are remedied without delay. Safeguarding and Welfare is a standing item on all major committees and staff are encouraged to bring any matters of concern to the attention of a senior member of staff without delay. The DSL meets weekly with the DSOs, in addition to regular meetings with the Astrum Education DSL where the Safeguarding and Welfare Policy will be reviewed and revised as necessary. The basis for, and nature of, any changes will be published to all staff, and parents or students as appropriate.

If there has been a substantiated allegation against a member of staff, the College will work with the LADO to determine whether there are any improvements to be made to the College's procedures or practice to help prevent similar events in the future.

Responsibilities

At board level (Governors) the nominated Governor for Safeguarding is designated to take responsibility for safeguarding and promoting the welfare of children and is responsible for policy. The Governing body undertakes an annual review of the College's policies and procedures (in the Autumn Term or more frequently as required) and considers how the College's duties have been discharged. The Principal, DSL and the staff are responsible for implementation.

The Safeguarding Governor acts on behalf of the Chair of Governors and advises and offers guidance to the College senior management team on all issues relating to safeguarding, welfare and boarding. The Safeguarding Governor will carry out compliance visits to the College to ensure all welfare policies, including safeguarding, are being applied.

Colleges are required to report to the Secretary of State, via the DBS, within one month of leaving the College any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children.

In this context, ceasing to use a person's services includes:

- dismissal; non-renewal of a fixed-term contract;
- no longer engaging/refusing to engage a supply teacher provided by an employment agency;
- terminating the placement of a student teacher or other trainee;
- no longer using staff employed by contractors;
- no longer using volunteers;
- resignation;
- voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.

It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence. 'Compromise agreements' cannot apply in this connection, or where the individual refuses to cooperate with an investigation. The College has a legal duty to respond to requests from the DBS for information they hold already, but they do not have to find it from other sources.

Designated Safeguarding Persons

The Designated Safeguarding Lead who takes responsibility for dealing with child protection issues and liaising with other agencies is Dershna Patel (Vice Principal)

Daliya George and Sally Faulding are the DSOs

Both the DSL and the DSO have DSL level four training provided by relevant agencies. In the absence of the DSL, the DSO is responsible for

- Adhering to the LSCB, LA and College procedures with regard to referring a child if there are concerns about possible abuse;
- Keeping written records of concerns about a student even if there is no need to make

- an immediate referral;
- Ensuring that all such records are kept confidentially and securely and are separate from general student records;
- Ensuring that an indication of further record-keeping is marked on student records;
- Ensuring that any student currently on the child protection register who is absent from College without explanation for two days is referred to Social Services. In such a case, where the child has not attended the first lesson, contact is made as soon as possible to find out what explanation is given for absence. Depending on the response received, a referral will be made more urgently.

A full copy of the Designated Safeguarding Lead job description can be found in Appendix 6. Staff may report allegations or get advice from the DSL or directly from the Local Safeguarding Children Board (see [Appendix 5](#) for contact information).

Supporting Children

We recognise that a young person who is abused or witness's violence may find it difficult to develop and maintain a sense of self-worth. In these circumstances a child may feel any of the following: helpless, humiliated, and self-blame. Chelsea Independent College will support all students by:

- Encouraging self-esteem and self-assertiveness whilst not condoning aggression or bullying;
- Promoting a caring, safe and positive environment within the college;
- Liaising and working together with all other support services and those agencies involved in the safeguarding of young people;
- Ensuring that young people have access to a source of counselling, either at College or through an outside agency;
- Notifying Social Services as soon as there is a significant concern, after discussion with the LSCB or the appropriate LA for the young person concerned.
- Providing continuing support to a student who leaves the College, about whom there have been concerns, by ensuring that appropriate information is forwarded under confidential cover to the young person's new school.
- Gaining assurance that the employees of any other organisation supervising students on a different site have undergone the necessary checks.

Confidentiality

We recognise that all matters relating to child protection are confidential, in the sense that they must not be generally discussed. The DSL will only disclose any information about a young person to other members of staff on a 'need to know' basis. All staff must be aware that they have a professional responsibility to share information with other agencies, through the defined College channels, in order to safeguard children. All staff must be aware that they cannot guarantee confidentiality to a young person when listening to any disclosure since an issue may need to be referred on.

Supporting Staff

We recognise that staff working in the College who have become involved with a young person who has suffered harm or appears likely to suffer harm may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the designated teacher and to seek further support as appropriate.

Whistle-Blowing

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College safeguarding regime and that such concerns will be taken seriously by the SLT and Governors.

The NPSCC whistle-blowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285, the service is available from 8.00am to 8.00pm, Monday to Friday and can be emailed at: help@nspcc.org.uk

Prevention

We recognise that the College plays a significant part in the prevention of harm to our young people by providing students with good lines of communication with trusted adults, supportive friends and an ethos of protection. The College community will therefore:

- have regard that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the College students on another site (see the College Trips Policy);
- establish and maintain an ethos where young people feel secure, are encouraged to talk and are always listened to;
- ensure that all young people know there is an adult in the College whom they can approach if they are worried or in difficulty;
- ensure that all young people know there is an Independent Listener, not connected with the College, whom they can approach if they are worried or in difficulty;
- include in the curriculum opportunities for PSHEE which equip young people with the skills they need to stay safe from harm and to know to whom they should turn for help. This includes opportunities to teach children how to be safe online and when active on social media.

Looked after children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The governing bodies ensures that the DSL/DSOs have the skills, knowledge and understanding to keep looked after children safe.

Appropriate staff will have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The DSL should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

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.

Links with other policies

- Physical Intervention

Staff must only ever use physical intervention as a last resort, and at all times it must be the minimal force necessary to prevent injury to another person or the young person injuring him or herself. Staff should refer to the policy on physical restraint. Members of Staff understand that evidence of physical intervention of a nature which causes injury or distress to a young person may be considered under safeguarding or disciplinary procedures.

- Bullying and racist incidents

Staff should understand that, in dealing with allegations or incidents of bullying, it may be necessary to invoke safeguarding procedures. Detailed guidance on bullying and racist incidents and the procedures to follow are provided in the College's [Anti-Bullying Policy](#) (available on the College's website).

- Health & Safety

The CIC [Health & Safety policy](#), set out in a separate document (available on the College's website), reflects the consideration we give to the protection of our young people both within the College environment and when away from the College when undertaking College trips and visits.

- Substance Misuse Policy

The CIC [Substance Misuse Policy](#) (available on the College's website) sets out how, in promoting the welfare of students, the College actively discourages the use of illegal drugs and harmful substances. Where concerns or suspicions surrounding a student's substance abuse nevertheless exist, the College will, in conjunction with parents, take steps and measures to safeguard the student.

- Staff Code of Conduct

The College has a [staff code of conduct](#) as a separate document (Appendix 1 to this document) which provides clear guidance about behaviour and actions so as not to place pupils or staff at risk of harm or of allegations of harm to a pupil.

- Recruitment Policy

The College has a recruitment manager, who oversees all appointments and ensures all such appointments are made with due regard to the latest regulations and are recorded in the SCR. The College's [recruitment policy](#) can be found on the College's website.

Appendix 1 Safeguarding Guidance to staff/Code of Conduct – also see Appendix 4

Chelsea Independent College is committed to safeguarding and promoting the welfare of young people and expects all staff to share this commitment.

It is everyone's responsibility to ensure that students are cared for appropriately and safeguarded from any harm, and their duty of care to promote the health, safety and welfare of all members of the boarding community.

This staff code of conduct for CIC gives clarity to the measures needed to ensure that all employees and students can work within and enjoy being part of a safe and caring environment.

It is acknowledged that the vast majority of employees behave appropriately whilst working with our students. Whilst it is recognised that the individual members of an organisation may hold differing values and opinions, adults working in an educational environment are in a position of trust and their conduct is, therefore, governed by specific laws and guidance and the policies and procedures agreed by the Principal and Governing Body.

Staff occasionally express uncertainty as to what is and is not acceptable and seek guidance regarding those behaviours which, whilst most probably innocent, may be perceived by others as inappropriate*.

The following is, therefore, a code of appropriate conduct for all adults working in or on behalf of the schools and colleges, including those involved in out of college activities. Adherence to this code should ensure that both students and adults are safe from misconduct or unfounded allegations of misconduct.

All staff must read and agree to work in-line with [part one and Annex A of the Department for Education 'Keeping Children Safe in Education'](#) statutory guidance for schools and colleges 2019.

In order that staff do not place themselves or students at risk of harm or of allegations of harm to a student, staff must take care to:

- Avoid all situations where they are on their own with a student unless necessary and, in such situations, ensure that there is easy sight of the classroom (no closed doors) and that there is another member of staff or support staff in the vicinity.
- A senior member of staff should always know and approve the arrangements whereby one-to-one tuition or coaching takes place. Last-minute or informal arrangements for one-to-one tuition or coaching should be avoided wherever possible.
- College email addresses must be used to give and receive appropriate messages between staff and students, and the system is readily available to scrutiny if necessary. It is good practice to keep email contact formal and professional. Any email address for staff or student which is not the College address should not be used (see [Appendix 4](#)).
- Students' mobile telephone numbers should not be used without the express permission of the students' parents and in exceptional circumstances, and the use of texts should be avoided. It is good practice to use a College mobile to make contact with a student (e.g. on a trip or college outing) and to collect and use student numbers only in the context of a planned, risk assessed trip. Numbers should not be stored on a personal

mobile and students should not have access to teachers' personal mobile numbers (pastoral leaders may keep confidential paper copies of telephone numbers).

- For additional guidance on the use of technology for communication between staff and students, see [Appendix 4: "Child Protection: email, mobile phones and students"](#).
- Avoid giving lifts to students, particularly one-to-one, other than in an emergency when a senior member of staff should be informed.
- Ensure all out-of-college contact with students is authorised by their parents or guardians and/or a senior member of staff.
- Seek advice from a senior colleague if a student's need to speak to you seems out of the ordinary or makes you feel uncomfortable.

The College will, on occasion, employ ex-students, who have recently completed their studies, to work in temporary or part-time positions during the recruitment season.

The College acknowledges that the established relationships between these particular individuals and current students may have an impact on the nature of their communication and contact that is distinct from other employees. The College will inform such staff of our Safeguarding & Welfare Policy and appropriate good practice but if a member of staff has any concerns about this situation then they are encouraged to contact their line manager or the DSL without delay.

If teaching one-to-one lessons

- avoid meetings with pupils in remote, secluded areas of the college;
- ensure there is visual access and/or an open door in one to one situations;
- inform other staff of the meeting beforehand, assessing the need to have them present or close by;
- avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy;
- consider the needs and circumstances of the child/children involved.

You should always:

- Adhere to all College policies, many of which are specifically written with safeguarding in mind. For example: Child Protection, Behaviour Management, Anti- Bullying, Equal opportunities, Health and Safety and Code of Conduct
- Behave in a mature, respectful, safe, fair and considered manner at all times.
- Provide a good example and 'positive role model' to the students
- Observe other people's right to confidentiality (Unless you need to report something to the Designated Safeguarding Lead e.g. concerns about a child protection issue).
- Treat all students equally; never build 'special relationships' with individual students or confer favour on particular young people in our care.

Report to the College DSL (As soon as possible)

- Any behaviour or situation which may give rise to complaint, misunderstanding or misinterpretation.
- Any difficulties that you are experiencing, for example, coping with an unruly student; situations where you anticipate that you may not be sufficiently qualified, trained or experienced to deal with or handle appropriately.

- Any behaviours of another person working (report to the Principal) in the College which give you cause for concern or breach of this code of conduct or other College policies and procedures

You should never:

- **Behave in a manner that could lead a reasonable person to question your conduct, intentions or suitability to care for student's welfare.**
- Touch students in a manner which is or may be considered sexual, threatening, gratuitous or intimidating.
- Discriminate either favourably or unfavourably towards any student.
- Make arrangements to contact, communicate or meet students outside of work.
- Have any electronic contact, including through social media with any current or past student unless this has been authorised by the Principal or DSL
- Develop 'personal' or sexual relationships with a student.
- Push, hit, kick, punch, slap, throw missiles at or smack a student or threaten to do so unless your own personal safety is threatened.
- Make inappropriate* remarks or jokes of a personal, sexual, racial, discriminatory, intimidating or otherwise offensive nature.
- Intentionally embarrass or humiliate students, for example, by using sarcasm or humour in an inappropriate* way
- Give or receive (other than 'token') gifts unless arranged through your line manager.
- Allow, encourage or condone student to act in an illegal, improper or unsafe manner e.g. smoking or drinking alcohol.
- Undertake any work with students when you are not in a fit and proper physical or emotional state to do so. For example: under the influence of medication which induces drowsiness; with a medical condition which dictates that you should not be caring for students; under extreme stress which is likely to impair your judgement.

*** Please note:**

It is the perception of the person subject to a remark or action rather than your stated intention that defines 'appropriate' or 'inappropriate'.

As per the College's Behaviour and Expectation's policy corporal punishment is forbidden in all circumstances and is contrary to College policy.

Should any use of restraint by staff be required, it will be reasonable, proportionate and lawful. Restraint will only be used when immediately necessary and for the minimum time necessary to prevent a pupil from doing or continuing to do any of the following:

- committing a criminal offence
- injuring themselves or others
- causing damage to property, including their own
- engaging in any behaviour prejudicial to good order and discipline at the College or among any of its pupils, whether that behaviour occurs in a classroom or elsewhere.

When using force in response to risks presented by pupils with SEN, disabilities or medical conditions, the College will have due regard to the Equality Act 2010 making reasonable adjustments.

Appendix 2

Disclosures and Reporting Arrangements

In the event of a student discussing an allegation of abuse with a member of staff, it is important:

- not to promise absolute confidentiality in order to elicit disclosure or further disclosure. The student should be advised that the chosen member of staff will listen carefully; will take any complaint seriously; will have the student's welfare uppermost in mind and may need – in that context and using the proper channels
- to discuss any disclosure or allegations made by the student with other appropriate professionals.
- not to ask leading questions, if possible. Allow the student to speak freely and clarify rather than lead. Clearly, the age of the young person and his or her ability to relay events cogently will be relevant in assessing what should be asked and how it should be asked.
- not to require the student to repeat distressing details, allowing for the fact that disclosures of abuse are of their nature distressing;
- to write down the details of the disclosure at the time (including questions and answers, if possible) or immediately afterwards, if it is not practicable to do so contemporaneously.

In the event of a member of staff needing to report a disclosure or a suspicion of abuse, the DSL should be informed immediately or, in their absence, the DSO who will ensure the DSL is informed as soon as possible. It is important that any member of staff should feel able to bring any suspicions about any person (whether suspicions about another member of staff, for example, or a parent of a student) to the DSL. Chelsea Independent College underlines the importance of staff being able to voice concerns about any student's welfare and an "open door" policy is encouraged in this important respect by the Principal.

Similarly, whilst the guidance places the responsibility of making decisions about referrals with the College's designated safeguarding lead, the importance of children receiving the right help at the right time to address risks and prevent issues escalating and the importance of acting on and referring the early signs of abuse and neglect is such that teachers can seek advice or report allegations directly to the Local Safeguarding Children Board. Similarly, teachers have the right to contact the LSCB directly if they feel a situation is not improving or to challenge inaction.

In addition, staff should differentiate between children who are in need of additional support from one or more agencies and children who have suffered or are at risk of suffering serious harm. Children who have suffered or are at risk of suffering serious harm must be reported to children's social care immediately. Children who are in need of additional support from one or more agencies need to use the CAF (Common Assessment Framework) and "Team Around Child" (TAC) approaches.

The DSL will take notes of the disclosure or suspicion and, having ascertained the facts of the allegation (if known), will consult the relevant LADO (Local Authority Designated Officer) immediately or as soon as is practicable and certainly within 24 hours. The DSL will not conduct an investigation until the LADO has advised them whether a referral is necessary.

In the event of an allegation being made against a member of staff, both the College and the LADO will have regard to the young person's safety and to the potential for damage to the

reputation and career of the member of staff where the allegation proves false. In this context, it is imperative that all teachers understand the need for discretion and tact: gossip can inflame difficult and sensitive situations. Where a teacher is suspended pending an investigation, it must be understood that such a suspension is a neutral act and does not suppose guilt on the part of the suspended teacher.

In the case of ceasing to use a person's services, including dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering: it is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence. 'Compromise agreements' cannot apply in this connection, or where the individual refuses to cooperate with an investigation. Proprietors of independent schools have a legal duty to respond to requests from the DBS for information they hold already, but they do not have to find it from other sources.

In addition, Chelsea Independent College is under a duty to consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are:

- unacceptable professional conduct
- conduct that may bring the profession into disrepute
- conviction, at any time, for a relevant offence

Where a referral has been made to the DBS, it is also necessary for a referral to be made to TRA, as the two bodies use different criteria for their respective judgements.

For further information, please refer to the TRA document: [Teacher misconduct: the prohibition of teachers: Advice on factors relating to decisions leading to the prohibition of teachers from the teaching profession](#) (April 2018).

Contact details for the Tri-Borough (RB Kensington & Chelsea, Westminster and Hammersmith & Fulham) and Referral Team are provided in [Appendix 5](#). Staff need to remember that, while Chelsea Independent College is in Hammersmith and Fulham, the Boarding House is in Kensington & Chelsea and Pure Hammersmith is in Hammersmith and Fulham, their contact details are in [Appendix 5](#).

It may also be necessary to report to another LA depending on the nature of the disclosure and the location of the child's home.

Appendix 3

Definitions and signs of abuse

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children (not limited to bullying or cyber bullying). Young people may be abused in a family or in an institution, such as this College, by those who know them or, more rarely, by others (e.g. via the internet).

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. Staff should be aware of behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting that put young people in danger.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or no 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

Signs of Physical Abuse

Physical Indicators:

- Unexplained bruises and welts on the face, throat, upper arms, buttocks, thighs or lower back in unusual patterns or shapes which suggests the use of an instrument (belt buckle, electric cord) on an infant in various stages of healing that are seen after absences, weekends, or vacations.
- Unexplained burns, cigarette burns, especially burns found on palms, soles of feet, abdomen, buttocks; immersion burns producing "stocking" or "glove" marks on hands and feet; "doughnut shaped" on buttocks or genital area.
- Rope burns.
- Infected burns indicating delay in treatment; burns in the shape of common household utensils or appliances.

Behavioural Indicators:

- Behavioural extremes (withdrawal, aggression, regression, depression).
- Inappropriate or excessive fear of parent or caretaker.
- Antisocial behaviour such as substance abuse, truancy, running away, fear of going home.
- Unbelievable or inconsistent explanation for injuries.
- Lies unusually still while surveying surroundings (for infants).
- Unusual shyness, wariness of physical contact.

Signs of Sexual Abuse

Physical Indicators:

- Torn, stained or bloody underclothes.
- Frequent, unexplained sore throats, yeast or urinary infections.
- Complaints about pain and irritation of the genitals.
- Sexually transmitted diseases.
- Bruises or bleeding from external genitalia, vagina or anal region.
- Pregnancy.

Behavioural Indicators:

- The victim's disclosure of sexual abuse.
- Regressive behaviours (thumb-sucking, bedwetting, fear of the dark).
- Promiscuity or seductive behaviours.
- Disturbed sleep patterns (recurrent nightmares).
- Unusual and age-inappropriate interest in sexual matters.
- Avoidance of undressing or wearing extra layers of clothes.
- Sudden decline in school performance, truancy.
- Difficulty in walking or sitting.

Signs of Emotional Abuse

Physical Indicators:

- Eating disorders, including obesity or anorexia.
- Speech disorders (stuttering, stammering).
- Developmental delays in the acquisition of speech or motor skills.
- Weight or height level substantially below norm. .
- Nervous disorders (rashes, hives, facial tics, stomach aches).

Behavioural Indicators:

- Habit disorders (biting, rocking, head-banging).
- Cruel behaviour, seeming to get pleasure from hurting children, adults or animals; seeming to get pleasure from being mistreated.
- Age-inappropriate behaviours (bedwetting, wetting, soiling).
- Behavioural extremes, such as overly compliant-demanding; withdrawn-aggressive; listless; excitable.

Signs of Neglect

Physical Indicators:

- Poor hygiene, including lice, scabies, bedsores, body odour.
- Squinting.
- Unsuitable clothing; missing key articles of clothing (underwear, socks, shoes); overdressed or underdressed for climate conditions.
- Untreated injury or illness.
- Lack of immunizations.
- Indicators of prolonged exposure to elements (excessive sunburn, insect bites, colds).
- Height and weight significantly below age level.

Behavioural Indicators:

- Unusual school attendance.
- Chronic absenteeism.
- Chronic hunger, tiredness, or lethargy.
- Assuming adult responsibilities.
- Reporting no carer at home

Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Safeguarding incidents and/or behaviours can be associated with factors outside the C or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. Additional information regarding contextual safeguarding is available here: [Contextual Safeguarding - https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding](https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding).

Student Peer on Peer Abuse

There is no clear boundary between incidents that should be regarded as abusive and incidents that are more properly dealt with as bullying, sexual experimentation etc. This is a matter of professional judgement.

Peer on peer abuse is very serious and CIC takes its responsibilities to safeguard the welfare of children vulnerable to such abuse very seriously. Such Peer on peer abuse should never be dismissed as being “banter” or “part of growing up”. KCSIE 2019 highlights that peer on peer abuse is likely to take the form of male perpetrators and female victims.

If one child or young person causes harm to another, this should not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally seen as child protection issues. However, it may be appropriate to regard a young person’s behaviour as abusive if:

- There is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- The perpetrator has repeatedly tried to harm one or more other children; or
- There are concerns about the intention of the alleged perpetrator

If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether or not severe harm was actually caused.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

All incidents should be reported to the College DSL/DSO, who will make a professional judgement whether or not the incident has reached the threshold for a child protection issue. If the incident has not met the threshold of a child protection incident, then the issue will be managed and reviewed by the College welfare/pastoral meeting system and tutor.

The College has within the PSHEE provision opportunities to discuss the triggers that may lead to Peer on Peer abuse and how this may be prevented.

Sexual violence and sexual harassment

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Ultimately, any decisions are for the College to make on a case-by-case basis, with the designated safeguarding lead (or a

deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

The immediate response to a report

Responding to the report

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.

Staff should follow the College's policy on reporting safeguarding concerns to the DSL/DSO as soon as possible, ensuring that they do not promise confidentiality, listening carefully, not asking leading questions. Where possible any such disclosure should be made in the presence of two members of staff, one of whom could be the DSL/DSO.

Action following a report of sexual violence and/or sexual harassment

What to consider

CIC will carefully consider any report of sexual violence and/or sexual harassment. The DSL/DSO will be in possession of the complete safeguarding picture and therefore be the most appropriate person to advise on the College's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- if the alleged incident is a one-off or a sustained pattern of abuse;
- are there ongoing risks to the victim, other children, adult students or school or college staff; and
- other related issues and wider context. [Contextual safeguarding](#) is discussed on page 20 of this policy

Risk Assessment

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual

harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim, especially their protection and support;
- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them;

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the College will actively consider the risks posed to our pupils and students and put adequate measures in place to protect them and keep them safe.

The DSL/DSO will ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The College's risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the college's approach to supporting and protecting their pupils and students and updating their own risk assessment.

Radicalisation

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate on terrorist activity. Extremism is vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of the armed forces. Children and young people can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These can include exposure through the influence of family members or friends and/or direct contact with extremist groups and organisations or, increasingly, through the internet. This can put a young person at risk of being drawn into criminal activity and has the potential to cause significant harm. Examples of extremist causes that have used violence to achieve their ends include animal rights, the far right, internal terrorist and international terrorist organisations.

Preventing Radicalism

- The College recognises that it has a key part to play in preventing its students being drawn into terrorism. As a result of the Counter-Terrorism and Security Act 2015, the College must refer students to the police if it suspects that they are in danger of being radicalised. The College will cooperate closely with Channel panels and any other agencies as necessary.
- The DSL will ensure that staff are acquainted of the warning signs through Prevent awareness training. Staff will inform the DSL of any concerns that they may have about our students.
- The Acceptable Use of Computer and Network Policy reflects the fact that the College is aware that the Internet remains a significant risk to young people in terms of the propagation of extremist views. ISIS, in particular, has shown itself to be adept at using social media as a tool to groom and manipulate young people. The College has endeavoured to set the appropriate filters on its computers, whilst acknowledging that students may have legitimate reasons for

researching terrorism.

- All external speakers will need to submit a detailed summary of the content of their speech in advance of any presentation to pupils to the Principal, who may decide that that material to be presented is not appropriate for the audience. Pupils should be exposed to a range of views, but it is incumbent on the College to ensure that both sides of any argument receive an equal hearing, whether this in assemblies, form time or presentations from external speakers.

Female Genital Mutilation

Definition: Female genital mutilation is a form of child physical abuse.

FGM is a collective term for procedures that remove part or all of the external female genitalia for cultural or other non-medical reasons. However, the issue is complex and despite its very severe health consequences, parents and others who have the procedure carried out on their daughters may not intend it, or regard it, as an act of abuse but as a cultural practice.

The impact on children's physically and psychologically can be severe, at worst resulting in fatality and it is important that we raise awareness to try and prevent female genital mutilation and to offer support to children who have already been subjected.

The Serious Crime Act 2015 introduced a new duty on teachers, social workers and healthcare professionals to report to the police known cases of female genital mutilation (FGM) involving victims aged under 18. The Government announced on 20 October 2015 that this duty would come into force on 31 October 2015, and published procedural information and advice about the new duty. This can be found at <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>.

Some indicators that female genital mutilation may be about to or has already taken place:

- A conversation with a child may refer to female genital mutilation i.e. she may express anxiety about a "special procedure" or event that is to take place
- A prolonged absence from college and a noticeable change in the child's behaviour on their return, including a reluctance or inability to take part in physical activity
- A prolonged family trip to the country of origin
- A child may spend long periods of time away from class during the day-perhaps indicating bladder or menstrual problems
- A midwife/obstetrician/gynaecologist/general practitioner may become aware that Female Genital Mutilation has occurred when treating a female patient. This should trigger concern for other females in the household

The Female Genital Mutilation Act (2003) makes it an offence for UK nationals or permanent UK residents to carry out FGM abroad, or to aid, abet, counsel or procure the carrying out of FGM abroad, even in countries where the practice is legal (HM Government 2006)²¹.

Suspected cases of FGM will be reported via the College Child Protection (Safeguarding) policy to the DSL or in cases where a pupil is deemed to be in immediate danger to the Police.

Useful information summarising the FGM mandatory reporting duty can be found [here](#).

Child Sexual Exploitation

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with a person who is exploiting them. (KCSiE 2019)

Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

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

So-called ‘Honour Based’ Violence:

So-called ‘honour-based’ violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the DSL or if they feel the child is in immediate danger the Police. All staff need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Children who run away or go missing

The guidance takes into account the following documentation:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/307867/Statutory_Guidance_-_Missing_from_care_3_.pdf

Definitions

The following definitions apply to this protocol and relate to children who run away or who have gone missing. The definition of running away is taken from the [Young Runaways report](#) (Social Exclusion Unit, 2002) and includes reference to young people who self-define running away as being forced to leave because, for example, they do not believe they have any alternative.

Child/young person	A child or young person under the age of 18 years with the exception of a former relevant child within the Children (Leaving Care) Act 2000; these young people continue to be the responsibility of the Local Authority up to the age of 21 (24 years of in receipt of full time education)
Missing Person (APCO definition)	“A missing person is anyone whose whereabouts are unknown, whatever the circumstances of disappearance. He or she will be considered missing until located and his or her well-being, or otherwise, established.
Young Runaway	A child or young person under the age of 18 who has run away from their home or placement or feels they have been forced or lured to leave, or whose whereabouts is unknown.
Absent*	<p>A person is not at a place where they are expected or required to be.</p> <p>A child who is absent from their home or placement without permission for any length of time where their age, experience, background or ability make this a concern. This includes circumstances where:</p> <p>There is identified or imminent risk of the child being exposed to significant harm;</p> <p>The child poses a risk of <u>Significant Harm</u> to others;</p> <p>The absence is out of character or unusual behaviour;</p> <p>There are indications that the child has already come to harm;</p> <p>The child is not expected to return within reasonable time limits, is not staying at the homes of others known to them or cannot be easily located.</p> <p>A child in this category must be reported to the Police.</p>
Missing Child/Young Person*	Anyone whose whereabouts cannot be established and where the circumstances are out of character or the context suggests the person may be subject of crime or at risk of harm to themselves or another.
Looked After Child (LAC) / Child in Public Care	A child is looked after by a Local Authority if s/he is 'in care' by reason of a court order, or if s/he is provided with accommodation for more than 24 hours by agreement with her/his parents or with the child if s/he is aged 16 or more.
Unauthorised absence from residential care:	Absent for a short period of time and after a thorough risk assessment and consideration of their Care Plan, the absence does not raise concern for their immediate safety or that of anyone else.
Responsible local authority:	The authority that is responsible for the young person's care and care planning.
Host local authority	The authority in which the young person is placed when placed out of the responsible authority's area.

Absconded:	When a missing child is subject to a court order, such as curfew or bail conditions, Police must be made aware of the order and the expiry date in order for the child to be classified as a “missing person” not an absconder.
Abduction	Where a child has been abducted or forcibly removed from their place of residence, this is a ‘crime in action’ and should be reported to the Police immediately.
Sexual Exploitation and Grooming for potential Sexual Exploitation	Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive something (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing and/or others performing on them, sexual activities. Further information and guidance can be found at: LSCB Safeguarding Children and Young People at risk of Sexual Exploitation Policy.
Child Trafficking	Some missing children subsequently become trafficked, often for the purposes of sexual exploitation. They may be trafficked across both small and large geographical areas. For further guidance and information: Safeguarding Children who may have been trafficked. Practice Guidance (DFE, 2011).
Forced Marriage	Some young people run away because they are at risk of abuse. Forced Marriage in particular can lead to young women running away from home. See further guidance and information on the gov.uk website.
Children Missing Education	Children who are missing education are not necessarily missing from home. Procedures are followed to return the child to education. When a child is not in education and they cannot be found at a previous address, attempts are made to locate the family.

*Since April 2013 police forces have been rolling out new definitions of 'missing' and 'absent' in relation to children/ young people and adults reported as missing to the police. The police classification of a person as 'missing' or 'absent' will be based on an on-going risk assessment. Guidance on how police forces will apply new definitions to children was issued by ACPO in April 2013.

N.B. For the purposes of this protocol a child who has run away or who is missing will be defined as one where the episode has been reported to the Police and recorded on the Police COMPACT database.

Where practical the College will hold at least two emergency contact numbers for each pupil.

Child Who Has Run Away or Gone Missing from the Community (Home or Care) (Missing Child Policy)

Children may run away or go missing from home or care for a number of reasons, such as:

- Trying to protect themselves from abuse, including domestic violence and abuse;
- Trying to protect themselves from bullying or as a result of peer group pressures;
- Being scared and/or afraid or feeling unable to cope; they may feel they are failures or not valued with regard to some aspect of their lives that has not been apparent to adults who otherwise seem close to them.
- They may have been enticed or persuaded to go missing; been abducted by an adult who is acting inappropriately and who is using the child to meet their needs; or been "thrown out" by the parents/carers;
- In some cases, young people may run away or go missing following grooming by adults who will seek to exploit them sexually. Both boys and girls are at risk of child sexual exploitation and looked after children may be targeted by those wishing to abuse and sexually exploit them;
- There are particular 'push' or 'pull' factors pushing or pulling away from the home.

Reference should be made to the [Attendance Policy](#) and [Missing Child Policy](#) for detailed procedures to be followed.

Appendix 4

Email, Social Networking and Mobile Phones – Guidance for Staff **(code of conduct)**

The College recognises that there may be occasions when a member of staff may have to communicate with a student via email or (perhaps to a lesser extent) a mobile phone when carrying out their normal professional duties.

These normal professional duties may include:

- Email receipt of homework and teacher acknowledgement
- Email receipt of UCAS material and teacher comment/suggestions
- Text messages or student mobile phone numbers while on a College trip/ visit to aid communication /safety
- Text messages or calls to students to chase up punctuality issues/ clarify whereabouts
E.g. Health and Safety/ Child Welfare concerns

As outlined in the College’s Safeguarding and Welfare policy and explained in regular briefings on Child Protection by the designated safeguarding lead, electronic communication between staff and students is limited to communication within the meaning of professional conduct. Communication which can be described as “grooming” or an abuse of trust will never be permitted. **Contact between staff and current students on Facebook and other social network sites is prohibited.**

The College suggests the following procedures of good practice in order to protect the interests of staff, the young person, and the College. Members of Staff should pay due regard to and implement these in addition to having ongoing discussions with colleagues in order to regularly monitor and review our personal and institutional practice.

Email

1. Only use College email accounts for any communication with a student. Do not use your personal email address.
2. Communications may be copied (for information/ record) to a relevant colleague. For example, if you are offering academic advice then you could copy in your Head of Department, or if the message is more concerned with a straightforward pastoral matter then the Tutor and /or Head of Year.

Facebook, Twitter and other Social Networking Sites

1. Consider carefully the public nature of such sites and decide if it is appropriate to join and what information about you will be open to parents, students and colleagues. If you have a personal blog then please take these matters into account too.
2. Never allow an existing student to join your circle of “Friends”. The College regards students as part of our community until they begin their career at another institution.
3. Training and advice on privacy settings on social networking sites and their safe use can be obtained from the College’s IT personnel.
4. Report any unwanted contact/ emails/ messages from an existing student to the appropriate designated DSL immediately.

Mobile phones/ text messages

1. Do not store the mobile phone numbers of students on your phone. A paper list of student numbers that you may need for regular contact (e.g. tutees, teams, music lessons) is acceptable.
2. Always use a College issued mobile phone for trips/ visits and, for speed and efficiency, student and parent emergency contact numbers may be stored on these for the duration of the trip/visit. They will then be removed at the conclusion of the trip
3. As with email, if a text message to a student is necessary then consider the style / language used – professional and purposeful not open to alternative interpretation. If in doubt, show the text message to a colleague or don't send the message.
4. Always consider if an alternative means of communication can be used to contact a student– e.g. a message via another student or their parents.

Photography / Video recording / Audio recording

1. Any recording taken of a student must be for legitimate academic / educational reasons. The validity and necessity of such recording must be transparent and obvious or approved in advance by a line manager.
2. Student consent must always be obtained in advance of any recordings. Recordings must never be clandestine.
3. Care must be taken if recording images of students in clothing other than normal college dress, e.g. sports kit or costume drama. It is never acceptable to record images where students may not be fully dressed, e.g. backstage in drama productions or changing rooms or sports venues.
4. It is good practice to use designated College equipment to make such recordings. If staff or students have to use their own personal IT equipment to record images, then the appropriate designated safeguarding person should be informed. Recordings taken with personal equipment must be transferred to College IT facilities without undue delay and immediately deleted from the personal equipment. It is good practice to ask a member of the IT Helpdesk personnel or a colleague to verify this transfer and deletion.
5. All recordings of students on College or personal equipment must be deleted or destroyed once their specific educational purpose has been achieved.
6. Any temporarily stored recordings must be held on a College issued computer. They must not be held on a personal computer or equivalent IT device. Copies must not be made nor distributed or shared.

Appendix 5 Useful Contact Details

Chelsea Independent College Designated Safeguarding Lead (DSL)
Dershna Patel – dershna.patel@cic.ac

Chelsea Independent College Designated Safeguarding Officer (DSO)
Sally Faulding – sally.faulding@cic.ac
Daliya George – daliya.george@cic.ac

Astrum Education Safeguarding Governor
Stephen Mellor – Stephen.mellor@astrumeducation.com

For advice and guidance and to report an issue about an adult who is working with children and young people please contact:

Royal Borough of Kensington & Chelsea

Angela Flahive, Safeguarding Review and Participation Manager, Royal Borough of Kensington & Chelsea Tel: 020 7361 3467 Angela.Flahive@rbkc.gov.uk

LSCB arrangements for Hammersmith & Fulham, Kensington & Chelsea and Westminster

The Local Safeguarding Children Board for Hammersmith & Fulham, Kensington & Chelsea and Westminster replaces the previous three LSCBs (since April 2012). The Board ensures the coordination of safeguarding work by all agencies and monitors the effectiveness of child protection work across the three local authority areas.

The Board has an Independent Chair: Jenny Pearce (May 18) and has representatives from the key local agencies on its main Board, Subgroups and short life working groups. An integrated LSCB team supports and services the Board.

Each local area retains a multi-agency group to ensure the maintenance and development of effective local partnerships.

The LSCB Team can be contacted on: 07739 315388

If anyone is concerned about the welfare of a child and cannot make contact with the DSL they are encouraged to report any abuse or discuss concerns in relation to children and young people please contact:

- Hammersmith & Fulham - tel: 020 8753 6610
- Kensington and Chelsea - socialservices@rbkc.gov.uk or tel: 020 7361 3013
- Westminster - accesstochildrensservices@westminster.gov.uk or tel: 020 7641 4000

Prevent can be contacted on: 020 7340 7264

Appendix 6

Role Description of the Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead is a senior role within the College. Within this role, the DSL has the support of the Astrum's Safeguarding Governor and the wider safeguarding team which meets once every weekly and consists of the DSLs from Kensington Park School, Chelsea Independent College, the Nurse and the Executive Principal, who is also DSL trained.

The Designated Safeguarding Lead role includes the responsibilities for:

- Implementing and promoting the Safeguarding and Child Protection Policies and Procedures.
- Liaise with the Principal to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- The DSL is fully aware of LSCB protocols, procedures and threshold documents.
- Refer cases to the Channel programme where there is a radicalisation concern as required.
- Support staff who make referrals to the Channel programme.
- To ensure that there is always a safeguarding officer available when students are resident or in College.
- To ensure any suspected/arranged private fostering arrangement for a student is reported to the young person's local authority.
- The DSL should know how to recognise the signs of abuse and know when it is appropriate to make a referral to the relevant investigating agencies. A key person for contact is the Local Authority Designated Officer (LADO).
- DSL should have an understanding of the LADO role in order to work effectively with them.
- When making a referral and liaising with other agencies the DSL should act as a point of contact and a source of support, advice and expertise within the College.
- At all stages of the referral process, the DSL must keep the Safeguarding Governor and Principal informed of on-going investigations, on-going child protection issues and the welfare of students who are subject to a child protection plan.
- Acting as the main point of contact for College staff, student, families and external agencies. Receiving and acting upon any reported concerns. This includes ensuring that the completed paperwork is accurate, correct, fully completed and reviewed as necessary and stored in a secure and safe place.
- Providing support, advice and guidance to any other staff on an ongoing basis or on any specific safeguarding issue as required.
- Implementing, maintaining and updating the policy and procedures on an annual basis or as required.
- Ensuring that all relevant contact names and numbers are known to staff and displayed in an accessible place at all times.
- Keeping abreast of developments and understanding the latest information on data protection, confidentiality and other legal issues that impact on the protection of children, including attending appropriate regular training and ensuring all staff have appropriate and up to date training.
- Providing guidance on relevant matters to all staff members as appropriate and

promoting best safeguarding practice at all times.

- Advocating the importance of Child Protection to parents so that they know we have their child's best interests at the heart of our practice.
- Monitoring child attendance, accidents logs, pre-existing injury reports, concern forms and incident forms to exclude any possible child protection issues. These are reported and acted upon accordingly.
- Representing the key link to statutory agencies (Social Care or Police) during and following any formal investigations that may have to take place. This includes maintaining confidential records of reported cases, action taken, liaising with the statutory agencies and ensuring they have access to all necessary information.
- Liaising with local children's services and our LSCB as necessary.
- To produce a monthly report to Governors on safeguarding matters.
- Ensure that when a child leaves the College, any child protection files are copied for the new school, College or FE setting as soon as possible but transferred securely and separately from the main pupil file.
- Liaise with and co-ordinate within College the activities of any other agencies that become involved. This may involve completing the Common Assessment Framework (CAF) and taking on the role of the lead professional. The DSL should be familiar with the CAF and the local procedures in place for submitting the form. Further advice should be available from the LSCB.
- Attend, or arrange for an appropriate member of staff to attend, Child Protection Conferences and Core Groups relating to a child at the College.
- Submit a school child protection report to Child Protection Conferences.
- The DSL could be the lead professional in a case and should be familiar with this role and its associated responsibilities. The role of lead professional is usually decided on a case by case basis.
- Where children leave the College, the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, ensuring secure transit, and confirmation of receipt should be obtained. This should be transferred separately from the main pupil file. The DSL may wish to communicate information to the new school or college in advance of the pupil's start date to ensure continuity of support and care once the pupil arrives at their new school or college.
- Upon receipt of a transferring pupil's safeguarding file the DSL should ensure key staff such as the DSOs and SENCO, are aware as required

Training:

The DSL and DSO at Chelsea Independent College have received Level 4 Child Protection training in order to recognise how to identify signs of abuse and know when it is appropriate to make a referral.

The DSL/DSO receive training on inter-agency working. The DSL must have a working knowledge of the Local Safeguarding Children Board (LSCB), the conduct of a child protection conference and must be able to contribute to these and other inter-agency meetings effectively when required. A key role for the DSL is to ensure that the concerns and views of the College are represented and taken into account.

The DSL/DSO receive specific training on the role of the DSL, which should be refreshed every
Reviewed Sept 2019

two years (unless it is the first anniversary of the DSL/DSO qualifying, when they will undertake a refresher course).

Staff Safeguarding Training:

It is the role of the DSL, working with the Principal, to ensure all staff:

- Have induction training covering child protection, an understanding of safeguarding issues including the causes of abuse and neglect
- Are able to identify the signs and indicators of abuse
- Know how to respond effectively when they have concerns and know that they have a responsibility to report any concerns immediately
- Know how to respond to a disclosure appropriately
- Ensuring all staff are familiar with, and adhere to the Safeguarding and Child Protection Policy that is in place and know the procedures to follow and who to go to should the need arise. This is included as part of the staff induction programme and on-going CPD.
- Ensuring all relevant information around Child Protection is communicated to the staff team through our staff meetings and other means of internal communication.

Review of Safeguarding Practices of DSL

As part of the staff development/appraisal system, the DSL will be appraised on their role and practice on a yearly basis. DSOs will be appraised by the DSL who will be appraised by the Safeguarding Governor/Executive Principal.

Appendix 7

Induction of staff on College safeguarding procedures and policy

All new staff regardless of role including volunteers must complete the 'Child Protection in Education' course on EduCare on their first day of employment or attend a course in Child Protection. This course then must be followed by a meeting with one of the safeguarding team to discuss how the College implement policy.

Areas to highlight in the meeting between new staff and member of the safeguarding team:

Safeguarding

- What is safeguarding? Role of the Designated Safeguarding Lead (DSL) and Designated Safeguarding Officer (DSO).
- Location and summary of safeguarding policies and procedures.
- Keeping Children Safe in Education document and Staff Code of Conduct.
- All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 that may follow a referral, along with the role they might be expected to play in such assessments. If anyone other than the designated safeguarding lead makes the referral they should inform the designated safeguarding lead, as soon as possible.
- All staff should be aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.
- Confidentiality and expected response.
- Role of staff in safeguarding.
- ID badges, why they are worn and what the colours mean.
- Offering an opportunity for Q&A.

When going through the policy staff must read the full policy but the useful areas to specifically mention are:

Page 4 – [Training](#)

Page 5 – [Taking referrals](#) (specifically their right to go directly to LSCB)

Page 6 – [Allegations](#) (specifically immediacy of reporting and DSL coordination with LADO)

Page 7 – Allegations continued (specifically the need for confidentiality and limited feedback)

Page 9 – [DSL and DSO details](#)

Page 12 – [How staff can protect themselves against allegations \(Code of Conduct\)](#)

Page 14 – [What to do in the event of a disclosure](#)

Page 16 – [5 definitions of abuse](#)

Page 25 – [Guidance on contacting students](#)