



Safeguarding and Child Protection Policy

Applies to	All students in College and boarding premises
Approved by	Signed by: Martin Meenagh (Principal) Signed by: Stephen Mellor (Safeguarding governor) Approved by: Alastair Ramsay (Chair of Governors)
Annual Review	Reviewed: September 2019 Next interim reviews: January 2020 Next full review: August 2020

Key Personnel and Contact Details for Safeguarding at the College

<p>Designated Safeguarding Lead (DSL) & Officers (DSO) for college</p>	<p>Dershna Patel (DSL) [Vice Principal; member of Senior Leadership Team] 020 7610 1114 / 07714 901507 dershna.patel@cic.ac</p> <p>Daliya George (DSO) 020 7610 1114 daliya.george@cic.ac</p> <p>Sally Faulding (DSO) 020 7610 1114 sally.faulding@cic.ac</p>
<p>Designated Safeguarding Lead & Officers for Boarding</p>	<p>Paula Southam (DSL) paula.southam@astrumeducation.com</p> <p>Ben Rogers (DSO) ben.rogers@astrumeducation.com</p>
<p>Astrum Education Safeguarding Governor</p>	<p>Stephen Mellor Stephen.mellor@astrumeducation.com</p>
<p>Local Authority Designated Officer (LADO)</p>	<p>Megan Brown 020 8753 5125 lado@lbhf.gov.uk megan.brown@lbhf.gov.uk</p>
<p>Hammersmith and Fulham Initial Consultation and Advice (ICAT) <i>(formerly Front Door team)</i></p>	<p>020 8753 6610 family.services@lbhf.gov.uk</p>

**If a child/young person is at immediate risk of harm,
call the police on 999**

Key External Agencies, Services and Professionals' Contact Details

London Safeguarding Children Partnership (for Hammersmith and Fulham, Kensington & Chelsea, Westminster)	First Floor, Kensington Town Hall, Hornton Street, London W8 7NX	07739 315 388 www.rbkc.gov.uk/lscb/
Hammersmith and Fulham Child and Adolescent Mental Health Services (CAMHS)	48 Glenthorne Road Hammersmith London W6 0LS	020 8483 1979/77/40/44 Office mobile: 07725 606657 www.westlondon.nhs.uk/contact-us/sites-and-locations/
Police non-emergency point of contact		101
NSPCC	For concerns about a child, even if you're unsure, contact our professional counsellors for help, advice and support.	0808 800 5000 0800 028 0285 help@nspcc.org.uk
Childline	for those 18 and under	0800 11 11
'Prevent' Contacts		Tina Bencik Prevent Education Officer 020 7340 7264 tina.bencik@lbhf.gov.uk DFE contact: 020 7340 7264 counter.extremism@education.gsi.gov.uk
Forced Marriage Unit		020 7008 0151 fmf@fco.gov.uk

Chelsea Independent College's Safeguarding Reporting Summary

If you suspect a **child** is at risk of harm



contact DSL:
Dershna Patel - CIC Vice Principal
DESIGNATED SAFEGUARDING LEAD (DSL)
07714 901507
dershna.patel@cic.ac

DSL unavailable?



contact DSOs:
Daliya George
daliya.george@cic.ac

Sally Faulding
sally.faulding@cic.ac

DSL and DSOs unavailable and child is at immediate risk?



contact:
Hammersmith and Fulham's **advice team** on 020 8753 6610, or family.services@lbhf.gov.uk

Concerned about the conduct of a member of **staff**?



contact:
Martin Meenagh - Principal
07525 589518
martinmeenagh@cic.ac

Principal unavailable?
(or the concern is about him)



contact:
Richard Stevenson
Executive Principal
richard.stevenson@astrumeducation.com

Executive Principal unavailable?



contact:
Alastair Ramsay
Chair of Governors - elect
ar@headspaceacademics.com

A concern about the Chair of Governors should be reported to the **LADO (020 8753 5125)** without informing the Principal or Chair of Governors.

1. 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.

2. 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 college, 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](#) (2018))

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](#)' (2018).

[Keeping Children Safe in Education \(2019\)](#) 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 \(2018\)](#) 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 anybody can make a referral and parental consent is not required.

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 \(2018\)](#)

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 College Standards Regulations in respect of their suitability to work with children.

3. 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 \(DfE, September 2019\)](#), [Working Together to Safeguard Children \(July 2018\)](#) and [Prevent \(June 2015\)](#).

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 2019](#) are listed in the Act as partners of the panel.

4. 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.

5. 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 the Safeguarding governor of the college, Stephen Mellor, who is an NSPCC, LSCB and CEOP-trained Safeguarding and Child Protection trainer. Stephen Mellor carries out all levels of safeguarding training from Level 1 whole college training to Level 4 DSL training. The training 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 an online level 2 safeguarding course as part of their induction prior to them entering the classroom.

The Safeguarding Officers and DSL attend appropriate DSL training (level 4) run by appropriate training providers and their training is updated at a minimum of 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 safeguarding 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 \(2019\)](#).
5. Online Safeguarding training, online prevent training and online E-safety training;
6. Behaviour, rewards and sanction policy
7. Missing student policy
8. Login details and instructions for CPOMS

Whole College updates on child protection updates or training are also provided regularly at weekly staff meetings. These updates are minuted.

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

The DSL for Chelsea Independent College meets weekly with the DSL for Kensington Park College and the DSL for boarding to discuss student safeguarding and welfare concerns. All staff can refer a student to this group for discussion. 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 makes decisions regarding the welfare needs of students and will make a judgement on whether or not a concern has reached the threshold of becoming a safeguarding concern. The Head of Boarding is responsible for maintaining records of these meetings which are then shared with the DSLs. The College DSL will be responsible for any referrals and maintaining a log of such.

Any child may benefit from early help, but all college 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](#).

7. 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 her deputies. The Child Protection Online Management System (CPOMS) is the college’s preferred method of logging and reporting such concerns. Once a referral has been made to the DSL/DSO, support can be offered to the student concerned. This may take the form of internal support within the College’s pastoral structures, 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.

8. Informing Parents

The School will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively and the DSL will normally make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from CSC. If the allegation involves a member of staff the parents should only be informed with the LADO's consent.

For the avoidance of doubt, referrals to CSC or the LADO do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents' wishes.

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.

9. Volunteers

Arrangements for volunteers will vary according to whether or not such individuals are defined as being involved in regulated activity (Independent Colleges Standards part 4 paragraphs 190, 191 and 192). All volunteers are provided with a copy of this safeguarding 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 Educational Visits Policy on the College's website.

Staff working with College students

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 Educational Visits 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.

10. 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 Executive Principal. 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 Executive Principal) 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. 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.

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 Executive Principal without informing the Principal, who can be contacted by email (Richard.stevenson@astrumeducation.com). The Executive Principal 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.

Timescales

All allegations must be dealt with as a priority so as to avoid any delay. Where it is clear immediately that the allegation is unsubstantiated or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases being completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the Principal or Executive Principal (as appropriate) should instigate appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, as far as possible it should be held within 15 working days.

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 LSCP 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 colleges 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 colleges 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 anytime, 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.

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
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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.

11. Peer on Peer Abuse, including Bullying and Sexual Violence and Sexual Harassment

All staff should be aware that safeguarding issues can often manifest themselves via peer on peer abuse. This is most likely to include, but is not limited to: physical abuse of any kind; emotional abuse; sexually harmful behaviours; bullying (including cyber bullying), gender based violence/sexual violence and sexual harassment, sexting (also known as youth produced sexual imagery), initiation/hazing type violence and rituals, prejudiced behaviour, teenage relationship abuse.

All staff should recognise the gendered nature of some types of peer on peer abuse (that it is, in certain situations more likely that girls will be victims and boys perpetrators). However, all peer on peer abuse is unacceptable and will be taken seriously.

Bullying is a subset of abuse that can take different forms, including: physical, emotional, verbal, ostracism, homophobic and gender-related bullying and/or cyber bullying (which includes abusive messages posted online or sent by SMS or email or via other means using technology).

The college is committed to doing all it can to prevent and put a stop to peer on peer abuse in all of its forms and to ensuring that all staff, students and parents uphold this commitment and to ensuring that they receive the appropriate education and training to understand and implement the college's policy and procedures with regards to peer on peer abuse. This commitment extends to reviewing incidents of peer on peer abuse so as to learn lessons.

Staff should always be clear that abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

The college is determined that no kind of bullying or peer on peer abuse will be tolerated by students, parents or staff at the college.

A copy of the college's Anti-bullying policy can be found on the college website.

Staff training will include how to manage a report or disclosure of peer on peer abuse, including child on child sexual violence and sexual harassment.

Staff will be made aware of the harm caused by bullying through anti-bullying training and of the harm caused by other types of peer on peer abuse through safeguarding training and will use the college's anti-bullying and safeguarding procedures where necessary. Students will be made aware of the harm caused by bullying and other forms of peer on peer abuse, and the procedures the college has in place to minimise the risk of peer on peer abuse, through PSHEE, SRE, and in tutor groups. Indicators that a child may be being abused or harmed by a peer overlap with other indicators of abuse, which can be found at Appendix 3 of this Safeguarding Policy, which also provides information about those of our students who are more likely to be

particularly vulnerable to abuse of any kind.

All college staff, students and parents must be aware that engaging in bullying behaviour or condoning or failing to challenge or report bullying would lead to the application of child protection procedures (including, as necessary, the involvement of other agencies such as the police and CSC), and in the case of a member of staff being complicit, or otherwise involved, in bullying behaviour, to the application of the procedure in section 10 of this policy.

The safeguarding team will take all necessary action to ensure victims, perpetrators and any other child(ren) affected by peer on peer abuse receive appropriate support through thorough investigation, appropriate disciplinary, remedial and/or preventative action, detailed record-keeping (in CPOMS) and regular review of any situation in which peer on peer abuse is suspected or known to have taken place, in accordance with procedures laid out in the Anti-bullying Policy; Behaviour Policy, Rewards Policy; Risk Assessment Policy, and this policy. If there is a concern that a child is at risk of serious harm from bullying behaviour or peer on peer abuse, a referral will be made to CSC and/or the LADO and the College's Child Protection Procedures will be followed; the police will be informed in cases of serious harm.

The DSL and deputy DSLs will be familiar with and follow the advice contained in Para 5 of KCSIE in cases where sexual violence and/or sexual harassment is suspected, reported or disclosed.

12. E-Safety

The college adopts a whole college, holistic approach to online safety which (a) captures the range and complexity of the risks and of children's experiences of those risks; (b) seeks to mitigate those risks as far as possible without depriving children of the significant benefits provided by technology and the internet; and (c) handles all cases of online harm appropriately and with sensitivity.

Most of our children will use mobile devices and computers at some time. They are important tools for communication and education as well as for recreation and socialising. However, we know that some men, women and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails (cyber-bullying), to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings, radicalisation or sexual predation.

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

- **content:** being exposed to illegal, inappropriate or harmful material.

This includes but is not limited to (a) violent pornography or sexual images of children which affect a child's perception of girls, love and relationships; (b) material promoting harmful behaviours such as self-harm or eating disorders; (c) propaganda or material promoting extremism, radicalisation and/or terrorism; (d) material showing or depicting extreme violence or brutality; and (e) social media such as Facebook and Instagram which can provide children with distorted and unrealistic images of others' lives, causing some children to feel inadequate or distressed about their own lives.

- **contact:** being subjected to harmful online interaction with other users

This includes but is not limited to (a) cyber-bullying; and (b) contact from individuals seeking

to groom children for the purposes of sexual abuse or radicalisation.

- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm This includes but is not limited to (a) responding to and engaging with individuals seeking to groom or abuse children; (b) youth produced sexual imagery.

Having assessed the level and nature of risk posed to our students, and bearing in mind the prevalence of online harm and abuse in the UK, we consider the risk of online harm to be material, particularly in relation to: cyber-bullying; harm caused by youth produced sexual imagery, internet pornography or on-line grooming; and harmful material promoting behaviours such as self-harm and eating disorders.

The college's Staff Code of Conduct and ICT Acceptable Use Policy explain the responsibilities of staff in relation to keeping children safe in college.

The college will do all it reasonably can to limit children's exposure to the above risks when using our own IT systems, by having in place appropriate filters and monitoring systems which are designed to protect children from online abuse without "over blocking" or imposing unreasonable restrictions as to what children can be taught through online education.

Students also receive guidance on safe use of the web (including anti-bullying) through the PSHEE curriculum. Cyber-bullying by children, via texts, direct messages, social media or email, will be treated as seriously as any other type of bullying and will be managed through our Anti-bullying policy and procedures. Students are educated about the risk of online harm – including youth produced sexual imagery, and the ways to mitigate those risks in PSHEE and tutor groups.

Chat rooms and social networking sites are sources of risk of inappropriate and harmful behaviour in the digital arena. Some children will undoubtedly be 'chatting' on mobile or social networking sites at home.

Any child may suffer from online harm and all staff should be alert to the risk of it. Indicators that a child may be being abused or harmed online overlap with other indicators of abuse which can be found at Appendix 3 of the Safeguarding Policy. For further indicators that a child may be suffering from online harm, please see here.

If you suspect that a child may be at risk of or suffering from online harm, follow the procedure set out at the "Taking Referrals" section of this policy and discuss any concerns with the DSL immediately. The DSL will discuss the incident and agree on a course of action in accordance with the safeguarding procedures set out in the Safeguarding policy.

13. The sharing of youth produced sexual imagery (sexting)

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Sexting refers to both images and videos where:

- a person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18;

- a person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult; and
- a person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance 'Sexting in colleges and colleges: responding to incidents and safeguarding young people'.

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.

If a member of staff becomes aware of an incident involving sexting they should follow the safeguarding procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the imagery.

The DSL should hold an initial review meeting with appropriate college staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to Children's Services Local Referral, Intervention and Assessment Service Team, or the police as appropriate.

Immediate referral at the initial review stage should be made to Children's Services Local Referral, Intervention and Assessment Service Team/police if:

- the incident involves an adult;
- there is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs);
- what is known about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or is violent;
- the imagery involves sexual acts;
- the imagery involves anyone aged 12 or under; and
- there is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above applies then the DSL will use their professional judgement to assess the risk to students involved and may decide, with input from the High Master, to respond to the incident without escalation to Children's Services Local Referral, Intervention and Assessment Service Team, or the police.

In applying judgement the DSL will consider if:

- there is a significant age difference between the sender/receiver;
- there is any coercion or encouragement beyond the sender/receiver;
- the imagery was shared and received with the knowledge of the child in the imagery;

- the child is more vulnerable than usual i.e. at risk;
- there is a significant impact on the children involved;
- the image is of a severe or extreme nature;
- the child involved understands consent;
- the situation is isolated or if the image been more widely distributed;
- there other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances;
- the children have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be escalated according to our safeguarding procedures, including reporting to the police or children's social care. Otherwise, the situation will be managed within the College.

The DSL will record all incidents of sexting, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures.

14. Health & Safety, Extended College Activities and Educational Visits

The College's Health & Safety and Educational Visits procedures are set out in separate documents, and reflect the consideration given to the protection of our children both physically within the College environment and away from the College when undertaking College trips and visits.

Where extended college activities are provided by and managed by the college, our own Safeguarding and Child Protection Policy and procedures apply. Where other organisations provide services or activities on our site the member of the College's staff responsible for arranging the services or activities will check that the service or activity providers have appropriate procedures in place, including relevant risk assessments and safer recruitment procedures.

When our children attend off-site activities, including those abroad on College trips we will check that effective child protection arrangements are in place. All staff are bound by the college's Educational Visits Policy when arranging and organising off-site trips.

Policy Review

Safeguarding procedures are reviewed at least 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 Boarding DSL and Kensington Park College 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.

Responsibilities

At board level (Governors) the nominated Governor for Safeguarding, Stephen Mellor, 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.

15. Designated Safeguarding Persons

Both the DSL and the DSO have DSL level four training provided by the safeguarding governor. 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 Partnership (see Key Contacts sheet for contact information).

16. 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 college.
- Gaining assurance that the employees of any other organisation supervising students on a different site have undergone the necessary checks.

17. 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.

18. 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.

19. 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. Where a staff member feels unable to raise an issue with the SLT or Governing Body or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them. These are outlined in the Whistle Blowing policy. No member of staff will suffer a detriment or be disciplined for raising a genuine concern about unsafe practice.

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

20. 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 college 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.

21. Links with other policies

All related policies and procedures are available via the Staff Handbook or on the college website.

- Acceptable Use of ICT policy
- Admissions Policy
- Attendance Policy
- Anti-Bullying Policy
- Behaviour Policy
- Child Missing from Education policy
- Complaints Policy
- Curriculum Policy
- Educational Visits and College visitor Policy
- First Aid Policy
- Medical Care Policy
- Missing Child Policy
- Risk Assessments Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Substance misuse policy
- Staff Disciplinary, Grievance and Whistleblowing Policies

- Anti-bullying policy

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 policy

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 students or staff at risk of harm or of allegations of harm to a student.

- Safer 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

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 colleges 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 2019'](#) statutory guidance.

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 text

messages must only be sent via the college's management information system, SIMS. A College mobile must be used 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: Email, Social Networking and Mobile Phones](#).
- 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 students 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, Anti- Bullying, Equal opportunities, Health and Safety, Staff Code of Conduct, Acceptable use of ICT policy.
- 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 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 student 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 students, whether that behaviour occurs in a classroom or elsewhere.

When using force in response to risks presented by students 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 Partnership. Similarly, teachers have the right to contact the LSCP 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 colleges 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](#) (October 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.

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 college 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 college 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, colleges 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 college and/or can occur between children outside the college 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.

Online safety

Students should be just as clear about what is expected of them online as offline

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.

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and may constitute sexual harassment.

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 college 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 college 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 students 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 students and students and updating their own risk assessment.

Separate sites

The college is spread across two sites, a few minutes' walk apart. The boarding house is located less than one mile way in West Brompton and can be accessed via London Underground or by foot (a 15 minute walk). This is a busy part of west London and road traffic can be heavy. A risk assessment has been put in place to assess the risk to students travelling between the school sites and the boarding house. Students are briefed on road safety at college induction and this is further spoken about during a health and safety talk and in PSHEE lessons. Compulsory school age (CSA) students are timetabled to be in college from the start to the end of the day to avoid CSAs truanting or absconding during the school day. The school day ends at 4.10pm and roll call is held daily at 5.30pm at the boarding house. If a student was not present at evening roll call then procedures in the Missing Child policy would be followed.

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 students to the Principal, who may decide that that material to be presented is not appropriate for the audience. Students 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).

Suspected cases of FGM will be reported via the College Child Protection (Safeguarding) policy to the DSL or in cases where a student 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 college 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 student.

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

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 - accesstochildrenservices@westminster.gov.uk or tel: 020 7641 4000

Appendix 6 - Role Description of the Designated Safeguarding Lead (DSL)

Designated Senior Person for Safeguarding

Job description

The role will require close cooperation with:

- The Local Children's Services Teams
- All members of the Senior Management Team
- Other members of staff
- Parents and governors
- Members of the inspectorate, advisory and support services

General:

Astrum is committed to safeguarding and promoting the welfare of all our children. All staff are trained in child protection and work within the staff code of conduct and whistle blowing policies. All candidates for posts will be asked to provide suitable references, undergo an enhanced DBS check and will be asked, at interview, questions about safeguarding children. The colleges may contact any of your previous employers.

All posts within Astrum require staff to conduct themselves in a highly professional manner when dealing with children, parents and colleagues. Staff are expected to appreciate and promote the ethos and image of the colleges and should ensure that in all their actions and words they market the college in a positive manner. Disciplinary action may be taken against staff who bring the colleges' name into disrepute.

Staff at Astrum are expected to be aware of their own Health and Safety and to that of those around them and should take all reasonable steps to ensure that no one is placed in danger.

Specific Duties and Responsibilities: Are laid down in Annex B of Keeping Children Safe 2019 which must be read and fully understood by a DSL or Deputy. The following bullet points summarise these requirements.

Responsibility to be taken for the managing of Safeguarding throughout the group

- THE DESIGNATED SENIOR LEAD (DSL) is a senior member of the college's leadership team who is designated to take lead responsibility for dealing with safeguarding issues. The College has trained 3 members of staff who could fulfil this role to ensure that there is always someone on site to deal with an issue or to deputise should the DSL be compromised.

- The role of the Designated Senior Lead for Child Protection is to take lead responsibility for dealing with child protection and Safeguarding issues, provide advice and support to other staff, liaising with the local authority and working with other agencies.
- Liaising with the Principal and other senior managers in formulating and implementing the relevant policies of the Astrum group
- Paying special attention to the induction of new staff to the College. Regular meetings in the first year should aim to ensure that all group and local Tri-Borough policies and procedures are known and followed.
- Refer cases of suspected abuse or allegations to the relevant investigating agencies.
- Act as a source of support, advice and expertise within the group when deciding whether to make a referral by liaising with relevant agencies.
- Liaise with the relevant Principal to inform him of any issues and ongoing investigations and to ensure there is always cover for this role.
- Ensure the group's child protection/safeguarding policy is updated and renewed annually and work with the governing body regarding this.
- Ensure parents see copies of the child protection policy which alerts them to the fact that referrals may be made and the role of the group as this will help to avoid conflict later.
- Where children leave the college, ensure that their child protection/safeguarding file is copied for the new establishment as soon as possible but, as required by law, transferred separately from the main student file
- Ensure that when a child joins the College, any child protection files are requested from the previous college as soon as possible and transferred and held securely and separately from the main student file.
- Ensure that when a child leaves the College, any child protection files are copied for the new college, College or FE setting as soon as possible but transferred securely and separately from the main student file. Upon receipt of a transferring student's safeguarding file the DSL should ensure key staff such as the DSOs and SENCO, are aware as required.
- To recognise how to identify signs of abuse and when it is appropriate to make a referral.
- Have a working knowledge of how The Tri- borough Children Board operate, the conduct of a child protection conference and be able to contribute to these effectively when required to do so.
- Ensure every member of staff has access to and understands the college child protection/safeguarding policy especially new or part time staff who may work with different educational establishments.

- Consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum, for example through Information and Communications Technology (ICT), Personal, Social, Health and Economic Education (PSHEE) and/or Sex and Relationships Education (SRE).
- Understand and support the college with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at college or college.
- Recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online.
- Ensure all staff have induction training covering child protection and safeguarding and are able to recognise and report any concerns immediately as they arise.
- Be able to keep detailed, accurate and secure written records of referrals/concerns.
- Obtain access to resources and attend relevant or refresher courses at least every two years.
- Maintain records about children for whom there are safeguarding concerns and the individual Child Protection files for children who are the subject of a Child Protection Plan.
- DSL should have an understanding of the LADO role in order to work effectively with them.
- Liaise with Social Work Teams over suspected cases of abuse
- Liaise with and co-ordinate within college the activities of any other agencies that become involved
- 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 college child protection report to Child Protection Conferences
- Arrange for whole group training to be renewed at three year intervals, for all adults working within the group – both staff and volunteers.

The DSL is not responsible for:

- Investigating cases - this must be left to the Social Work Team and/or other appropriate agencies
- Acting as the child's therapist

Availability

During term time the designated safeguarding lead (or a deputy) will always be available (during college or college hours) for staff in the college to discuss any safeguarding concerns.

Whilst generally speaking the designated safeguarding lead (or deputy) is expected to be available in person, though in exceptional circumstances availability via phone and or Skype or other such mediums is acceptable.

The designated safeguarding lead will ensure adequate and appropriate cover arrangements for any out of hours/out of term activities.

The boarding house has a resident DSL (Head of boarding) and DSO who are always available should their assistance be required.

Training:

The DSL and DSOs 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/DSOs 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/DSOs receive specific training on the role of the DSL, which should be refreshed every two years (unless it is the first anniversary of the DSL/DSOs qualifying, when they will undertake a refresher course).

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 or before 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 \(2019\)](#) 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](#)