

Child Protection and Safeguarding Policy and Procedures

1. Overview

1.1 Important contacts

1.2 Related Policies

1.3 Guidance

1.4 Important Definitions

1.5 Review of the Safeguarding Policy

2. Identifying vulnerable students and signs of abuse

3. Procedures for handling concerns about a student

4. Procedures for handling allegations against staff members

5. Procedures for dealing with concerns regarding the safeguarding practices in the College

6. Management of safeguarding – pro-active measures

7. Roles and responsibilities in managing safeguarding

8. Specific safeguarding issues

Appendix 1: Signs and types of abuse

Appendix 2: Role of the Designated Safeguarding Lead (DSL)

Appendix 3: Role and duties of the Nominated Safeguarding Director (NSD)

Appendix 4: External contacts

Appendix 5: Further guidance

Annex A: COVID-19 Response

Annex B: Online safety

Appendix A – Vulnerable students with an EHCP

1. Overview

This policy has been authorised by the Principal and is addressed to all members of the Ashbourne community (staff, visitors, parents, guardians, volunteers and students). It applies wherever members of the

Ashbourne community are working with students, even when this is away from the College's premises, for example on an educational visit.

Ashbourne recognises that safeguarding and promoting the welfare of students is defined as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to achieve the best outcomes.

Ashbourne is a small community with approximately 300 students, ranging from the ages of 14-21. This policy is underpinned by Ashbourne's own value statement which includes 'Students Come First' as one of the key values: the College has a duty to consider at all times the best interests of the student and take action to enable all students to achieve the best outcomes. Every student should feel safe and protected from any form of abuse. Ashbourne also firmly believes that providing excellent safeguarding support can have a significant positive impact on student performance.

Ashbourne is committed to the promotion and development of equality and diversity. We believe that all students, regardless of age, gender, ability, culture, ethnicity, race, language, religion, beliefs, caste, disability or sexual identity, have equal rights to protection: to feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they have any concerns. No student or group of students must be treated any less favourably than another in being able to access support and services which meet their particular needs. This policy will be implemented in accordance with our [Equal Opportunities Policy](#), and decisions/actions taken in relation to potential safeguarding or child protection incidents will not be influenced by the background or situation of any persons involved. Each case will be dealt with on its own merits.

1.1 Important contacts at Ashbourne

| | |
|--|---|
| Designated Safeguarding Lead | Ms. Frances Burns Email: frances.burns@ashbournecollege.co.uk Safeguarding Mobile: 07578 548 537 |
| Deputy Designated Safeguarding Lead | Mr. Lee Kirby Email: lee@ashbournecollege.co.uk Safeguarding Mobile: 07951 510 224 |
| Nominated Safeguarding Director | Simone Shaw Email: simone.shaw@ashbournecollege.co.uk |
| Principal | Mr. Mike Kirby Email: mike.kirby@ashbournecollege.co.uk Tel: 020 7937 3858 |

Ashbourne's small size (fewer than 300 students) and the low number of referrals that the College makes to the Local Safeguarding Board (LSGB) at the Royal Borough of Kensington & Chelsea (RBKC) each year means that the DSL is able to manage all of the correspondence from Ashbourne to the relevant contacts at the council in a timely manner. Nevertheless, the College recognises that safeguarding and promoting the welfare of students is the responsibility of everyone in the Ashbourne community. It is, therefore, the Ashbourne community's responsibility to understand how to recognise, respond to, report, record and refer any concerns about the welfare of an individual student as appropriate.

The College works closely with the RBKC's Local Safeguarding Board and other relevant agencies to assess, identify, and support students who could benefit from early help, are suffering harm or who may suffer harm without intervention. Such agencies may include the Police, Children's Social Care (CSC) and health services.

1.1.2 Important contacts at RBKC

1.1.2.1 Pre-referral consultation

| | |
|--|---|
| Safeguarding Lead for Schools and Education | Elaine Campbell Bi-Borough Safeguarding Lead for Schools and Education Tel: 020 7361 300; 07712 236 508 Email: elaine.campbell@rbkc.gov.uk |
|--|---|

For case consultations or follow-up enquiries contact the Duty Child Protection Adviser in the first instance on 020 7361 3013.

| | |
|---|--|
| <p>MASH TEAM (Multi-Agency Safeguarding Hub)</p> <p>For case consultations, advice, guidance from the Safeguarding Teams in Children's Social Care</p> | <p>Sharon Aggor Family Support and Child Protection Adviser Tel: 07929 822 2840 Email: sharon.aggor@rbkc.gov.uk</p> <p>Sarah Stalker (Child Exploitation Lead) Family Support and Child Protection Adviser (Mon/Tues and Weds only) Tel: 020 7598 4640; 07971 322 482 Email: sarah.stalker@rbkc.gov.uk</p> <p>Anna Richards Family Support and Child Protection Adviser Tel: 07974 613 180 Email: anna.richards@rbkc.gov.uk</p> |
|---|--|

1.1.2.2 Making a referral about a student

| | |
|--|---|
| <p>Children's Social Care Team (CSC)</p> <p>To report a concern about a child or young person</p> | <p>Kensington and Chelsea Duty Line Tel: 020 7361 3013 including out of hours</p> |
|--|---|

1.1.2.3 Consultations or referrals about a staff member

| | |
|---|--|
| <p>Local Authority Designated Officer (LADO/Management of Allegations)</p> | <p>Kensington and Chelsea</p> <p>Contact the Duty Child Protection Officer for consultations and referrals Tel: 020 7361 3013 Email: KCLADO.enquiries@rbkc.gov.uk</p> <p>Aqualma Daniel</p> |
|---|--|

Safer Organisations Manager & Local Authority Designated Officer
Tel: 07870 481 712
Email: aqualma.daniel@rbkc.gov.uk

1.1.2.4 PREVENT

Prevent (Radicalism and Extremism)

Contact LBHF/RBKC Prevent team:
Tel: 020 8753 5727
Email: prevent@lbhf.gov.uk

Further contact details are provided in Appendix 4.

1.2 Related policies

This policy works closely with a number of other important College policies, which include the following:

- [Acceptable Use of ICT Policy and Agreement](#)
- [Administration Of Medicine Policy](#)
- [Anti-Bullying Policy](#)
- [Complaints Policy](#)
- [Data Protection Policy](#)
- [E-Safety Policy](#)
- [Equal Opportunities Policy](#)
- [Lanyard and ID policy](#)
- [Missing Child Policy for Students Under 16](#)
- [Peer-on-Peer Abuse Policy](#)
- [Relationships and Sex Education Policy](#)
- [Risk Assessment for Educational Visits Policy](#)
- [Risk Assessment Policy for Pupil Welfare](#)
- [Safer Recruitment and Selection of Staff](#)
- [SEND and Access Arrangements Policy](#)
- [Staff Code of Conduct](#)
- [Student Behaviour and Exclusions Policy](#)
- [Whistleblowing Policy](#)

1.3 Guidance

This policy has been developed having regard to a number of different guidance documents and legislation, with particular focus on the following Department for Education (DFE) guidance: [Keeping Children Safe in Education \(KCSIE\) – 2021](#)

KCSIE also refers to the non-statutory advice for practitioners:

- London Child Protection Procedures (September 2021)
- What to do if you're worried a child is being abused (March 2015)
- Working Together to Safeguard Children (July 2018)

This also refers to the non-statutory advice: Information sharing (July 2018)

- The Revised Prevent duty guidance: for England and Wales (April 2019) (Prevent).

Prevent is supplemented by non-statutory advice and a briefing note: The Revised Prevent duty: Departmental advice for schools and childminders (June 2015). The following guidance is also connected to the Prevent duty guidance – The use of social media for on-line radicalisation (July 2015)

- The NPCC Guidance on [When to call the Police](#)

A full list of the guidance this policy has referred to is shown in Appendix 5.

1.4 Important definitions

Ashbourne Community – This refers to any employee at the College, Nominated Safeguarding Director (NSD), visitors, parents, guardians, volunteers and students.

ACE – Adverse Childhood Experience

CAMHS – Children and Adolescents Mental Health Services

CEOP – Child Exploitation and Online Protection Command

CCE – Child Criminal Exploitation

Child – Relevant legislation and guidance consistently makes reference to 'child' or 'children'. As noted earlier, Ashbourne has students up to the age of 21. Therefore, where any statute or guidance makes reference to 'child', this policy will refer to 'student' as a reference to Ashbourne's commitment to safeguarding all students.

However, when handling individual safeguarding cases the DSL will always consider carefully the age of the student in terms of any safeguarding decisions made. In these cases, the following shall be noted in reference to 'child', ' Young people aged 18+' and ' Vulnerable Adult':

- Child – in accordance with The Children Act 1989, (and also in the Children Act 2004) and therefore in accordance with the law, the College shall regard any student below the age of 18 as a child.
- Young people aged 18+ – may in some circumstances be regarded as vulnerable as a consequence of earlier life-experience and may therefore fall within the remit of The Children Act 1989. The College will take action based on individual situations; for example, where a student is over 18 but wishes to report abuse which took place when they were younger or if there are younger siblings in a family who are thought to be at risk.
- Vulnerable Adult – is or may be in need of Community Care Services by reason of mental or other disability, age or illness and is, or may be, unable to take care of himself or herself, or unable to protect himself or herself against significant harm or serious exploitation. Vulnerability can apply to a wide range of disabilities and situations including those adults at risk owing to their caring role or family responsibilities. Vulnerability may be temporary or permanent. Individuals can become vulnerable when no previous conditions existed, for example if they become ill or they belong to a group with protected characteristics.

If the College receives information about an adult student (18 plus) which suggests that he/she has been abused or that it is likely they may be

abused, it has a duty to refer these concerns to Adult Services and/or the Police. If the College is unsure whether a referral is necessary, the DSL will consult with appropriate agencies, which is usually Adult Care Services.

CSC – Children’s Social Care

CSE – Child Sexual Exploitation

DSL – Designated Safeguarding Lead

DDSL – Deputy Designated Safeguarding Lead

LADO – Local Authority Designated Officer

LSCB – Local Safeguarding Children Board

MASH Team – Multi-Agency Safeguarding Hub

NSD – Nominated Safeguarding Director

PT – Personal Tutor

RBKC – Royal Borough of Kensington and Chelsea

SEND – Special educational needs and disability

SLT – Senior Leadership Team

SMT – Senior Management Team

RSE – Relationship and Sex Education

TRA – Teaching Regulation Agency

UKCCIS – UK Council for Child Internet Safety

Staff Members – This refers to any employee at the College, whether that be the Principal or other including supply staff, volunteer or NSD.

1.5 Review of the Child Protection and Safeguarding Policy

The DSL will ensure that this policy, as well as other related safeguarding policies, are reviewed at the annual Safeguarding meeting that takes place each June. The NSD and Principal will attend this meeting and changes will require their approval.

Throughout the academic year the DSL consults with staff either directly or indirectly through our safeguarding database and intranet (behaviour share). During these discussions there will be opportunities for staff to contribute to shape safeguarding arrangements. The DSL will also consider changes required as a result of any safeguarding incidents, new legislation or new guidance. This may lead to updates of the Child Protection and Safeguarding Policy throughout the academic year and reporting to the staff where appropriate.

All child protection incidents at the College will be followed by a review of these procedures by the DSL and a report will be made available to the Principal and the NSD. Where an incident involves a member of staff, the DSL will determine whether any improvements can be made to the College's procedures. Any deficiencies or weaknesses in regard to child protection arrangements will be addressed and remedied.

2. Identifying vulnerable students and signs of abuse

2.1 Types and signs of abuse

To ensure that students are protected from harm, it is very important that the Ashbourne community understands what type of behaviour constitutes abuse. Abuse is a form of maltreatment of a student.

Somebody may abuse or neglect a student by inflicting harm or by failing to act to prevent harm. Students may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Students may be abused by an adult or adults or by another student or students. Abuse can be:

- physical abuse
- emotional abuse
- sexual abuse; and/or
- neglect.

Further details of the types of abuse and possible signs of abuse are shown in Appendix 1. In addition, types of abuse and indicators relating to peer-on-peer abuse are outlined in section 8.7 below and in the [Peer-on-Peer Abuse Policy](#).

2.2 Awareness of vulnerable students

Some students may be at increased risk of significant harm as a result of neglect and/or physical, sexual or emotional abuse. Many factors can contribute to an increase in risk. The College will give special consideration and attention to any student who:

- does not speak English as their first language;
- has a family member in prison;
- has a SEND – this could include a pre-existing medical or mental health issue (e.g. PTSD or ACE – Adverse Childhood Trauma);
- has poor attendance or is frequently missing / goes missing from care or from home;
- identifies as either lesbian, gay, bi-sexual, transsexual or queer (LGBTQ+);
- is a young carer;
- is affected by known parental substance misuse or is misusing drugs or alcohol themselves;
- is affected by a parent(s) suffering with mental health problems or living in chaotic, neglectful and unsupportive home situations;
- is an asylum seeker;
- is a 'looked after' child (LAC) or a child in care or who has returned home to his/her family from care. This includes those who are subject to a care order or temporarily classed as looked after on a planned basis for short breaks or respite care;
- is at risk of modern slavery, trafficking, radicalisation or exploitation;

- is homeless;
- is involved directly or indirectly in prostitution or child trafficking;
- is in a private foster arrangement;
- is living away from home;
- is living in an identified domestic abuse situation;
- is living in temporary accommodation;
- is living a transient lifestyle;
- is showing signs of abuse/neglect;
- is showing signs of engaging in anti-social or criminal behaviour including gang involvement and association with organised crime groups;
- is vulnerable to being bullied, or engaging in bullying, including cyberbullying;
- is vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality.

2.3 Categories with additional focus

We think it is important to highlight a few categories in greater detail.

2.31 Has a SEND – Students with a SEND may not outwardly show signs of abuse and/or may have difficulties relating any abuse or neglect they suffer. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration;
- the potential for students with a SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

2.32 Mental Health – in some cases, mental health problems can be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. It is important to recognise that experiences of abuse, neglect or other trauma can have a lasting impact on mental health and behaviour.

Although staff are well placed to identify behaviour that may suggest mental health issues or the onset thereof, only trained professionals should attempt to make a diagnosis. Nonetheless, staff should speak with the DSL or deputy immediately if they have any safeguarding concerns about a student with respect to mental health issues.

Ashbourne follows the DfE's Mental health and behaviour in schools guidance (November 2018). The College facilitates mental health training awareness courses for staff.

All staff will be made aware of the importance of Mental Health issues for students through Inset Day training and regular Safeguarding Training updates throughout the year.

Key Staff, such as Personal Tutors and the DSL and DDSLs will have additional training on Mental Health awareness via online courses delivered by MHFA England or The Anna Freud Foundation.

Students will have Mental Wellbeing awareness delivered as part of the Personal Tutoring system and PSHEE Curriculum, and as a key focus on the first Inset Day of the year.

2.33 Has a family member in prison: Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

2.34 Lesbian, Gay, Bi-sexual, Transsexual or Queer (LGBTQ+):

Students who identify as LGBTQ+ can be targeted by their peers. In some cases, a student who is perceived by their peers to be a member of the LGBTQ+ community, whether they are or not, can be just as vulnerable as students who identify as LGBTQ+.

2.35 Homelessness: Being homeless, or at risk of homelessness

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

3. Procedures for handling concerns about a student

It is important that a student at risk or in need receives the right help at the right time to address risks and prevent issues escalating. It is therefore important that all staff understand their responsibility to: identify, act on and refer early signs of abuse and neglect; keep clear written records; listen to the views of the student; reassess concerns when situations do not improve; share information quickly and challenge inaction. All staff at the College are expected to comply with statutory guidance Working Together to Safeguard Children (2018) unless exceptional circumstances arise. In particular, staff are expected to appreciate that effective safeguarding systems are those where:

- the student's needs are paramount, and the needs and wishes of the students are put first, so that every student receives the support they need before a problem escalates;
- students who raise concerns and/or allegations are always taken seriously, are supported appropriately and never made to feel they are creating a problem for reporting abuse, sexual violence or sexual harassment;
- all staff who come into contact with students and families are alert to their needs and any risks of harm that individual abusers, or potential abusers, may pose to students;
- all staff share appropriate information using the FileMaker database to log concerns in a timely way and will discuss any concerns about an individual student with the DSL, DDSLs and the local authority

CSC team where appropriate;

- appropriately qualified, experienced staff are able to use their expert judgement to put the student's needs at the heart of the safeguarding system so that the right solution can be found for each individual student;
- all professionals contribute to whatever actions are needed to safeguard and promote a student's welfare and take part in regularly reviewing the outcomes for the student against specific plans and outcomes.

3.1 What staff should do if they have a concern about a student

If staff have any concerns about a student (as opposed to a student being in immediate danger), they should initially log these concerns using the secure Safeguarding Share option in the FileMaker database system, which will automatically move the information into the secure FileMaker Safeguarding database. Information should include:

- the date and time of the conversation;
- where the meeting took place;
- a clear and comprehensive summary of the concern; what was said and done by whom and in whose presence.

The information that is uploaded onto the Safeguarding database is secure and is only accessible to the DSL and the DDSLs. The DSL and DDSLs will also receive an email notification, without details of the incident, alerting them to check the Safeguarding database when a staff member logs an entry. If staff are to meet with the students individually, they should refer to clause 3.3 for additional advice about how to handle these conversations.

Staff should not assume that somebody else will take action and share information that might be critical to keeping students safe. If a student's situation does not appear to be improving, it is the legal duty for the staff member to challenge any inaction and follow this up with the DSL.

If the staff member continues to stay involved in the process to support

the student, they must ensure that concerns, discussions and decisions made, and the reasons for those decisions, are recorded and stored in the Safeguarding database.

Members of staff also have a legal duty to make a direct referral to CSC should circumstances demand. Ashbourne's small size, and the few referrals made by the College to the RBKC each year, mean the College has the resources to ensure that all correspondence to the local council comes directly, except in exceptional circumstances, from the DSL or DDSL in a timely manner. However, if anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. In these cases, after the referral has been made the DSL will follow things up.

3.1.1 DSL follow-up to a concern being raised

Initially this happens when a student registers at the College and has declared a previous safeguarding issue concern. This could be related to SEND, medical or vulnerability issues. The DSL must then ensure that all appropriate contacts have provided a complete and comprehensive set of documents relating to this safeguarding issue. The DSL will then make an entry on the safeguarding database allocating the student a grade from 0 to 4 on the Ashbourne safeguarding scale (see below).

After a staff member has logged their concerns about an individual student on the Ashbourne Safeguarding database, the DSL will read through the concern.

How is the DSL alerted to these concerns

The DSL may also decide to meet with the staff member who logged the concern to gain a better understanding of the situation. Irrespective of the concern raised, the DSL will ensure that a follow up meeting is organised with the student. In most cases this meeting will be with the DSL. However, the College understands that students may respond better to different individuals, and, therefore, the DSL may well involve another member of staff to meet with the student. In these cases the DSL will follow-up with the member of staff to ensure a clear understanding of

the concerns raised and that all information is logged onto the Safeguarding database.

During the individual meetings with the student, the DSL must decide whether a referral to CSC, early help or other support is appropriate, which must be done in accordance with the referral thresholds set by the LSCB. In addition, the College has five levels of need which it uses to categorise students on the Safeguarding database. The DSL will ascertain what level of need the student is at presently, and will take the appropriate action accordingly. The levels of need are as follows:

- 0 – No concern
- 1 – Mild concern
- 2 – Moderate concern
- 3 – High concern
- 4 – Referral

With each level, the DSL will put in place different action plans, which are detailed below:

0 – No concern

If the DSL deems it necessary, a note will be sent to the teachers of this particular student to update them on the student's situation and, where appropriate, relevant information will be shared.

The Safeguarding Team will no longer monitor the students progress as a result of the concern being raised.

The DSL will ensure that all notes are updated on the Safeguarding database. Reasons will be given as to why this student is no longer deemed a concern.

1 – Mild concern

At the initial assessment meeting, or possibly thereafter, appropriate support will be put in place to support the student.

If the DSL deems it necessary, a note will be sent to the teachers of this particular student to update them on the student's situation and, where appropriate, relevant information will be shared.

A follow up meeting will be organised at another point in the year to assess the student's progress. Usually at this point, unless further concerns are raised, the student will be moved from Mild Concern to the No Concern category.

The DSL will ensure that all notes are updated on the Safeguarding database.

2 – Moderate concern

At the initial assessment meeting, or possible thereafter, appropriate support will be put in place to support the student.

If the DSL deems it necessary, a note will be sent to the teachers of this particular student to update them on the student's situation and, where appropriate, relevant information will be shared.

At minimum, a follow up meeting will be organised once per term.

At the subsequent follow-up meetings, the DSL will consider what additional support is required or whether the student needs to change into a different category.

The DSL will ensure that all notes are updated on the Safeguarding database.

3 – High concern

At the initial assessment meeting appropriate support will be put in place to support the student.

If the DSL deems it necessary, a note will be sent to the teachers of this particular student to update them on the student's situation and, where appropriate, relevant information will be shared.

At minimum, a follow up meeting will be organised once per half-term.

At the subsequent follow-up meetings, the DSL will consider what additional support is required or whether the student needs to change into a different category.

The DSL will ensure that all notes are updated on the Safeguarding database.

4 – Referral

At the initial assessment meeting appropriate support will be put in place

to support the student.

If the DSL deems it necessary, a note will be sent to the teachers of this particular student to update them on the student's situation and, where appropriate, relevant information will be shared.

This case will be followed up by the DSL on a daily basis to ensure that the College has completed all of the things that have been agreed to support this student. This may involve checking attendance, and communicating with external agencies, teachers, peers and family members who are involved in the situation.

The DSL will ensure that all notes are updated on the Safeguarding database.

If the DSL deems that a referral to the CSC is required, the DSL will take additional steps, which are outlined in 3.3. It should be noted that as a general policy at Ashbourne, whenever the DSL has a concern that a student is in immediate danger, the CSC would be contacted; depending on the situation the initial discussion may be on a no-names basis to seek guidance.

3.2 What staff should do if a student is in danger or at risk of harm; circumstances for referring to the Police

If staff believe that a student is in immediate danger or at risk of harm, they must ensure that an immediate referral is made to the CSC and/or the Police. If there is an immediate, urgent and extreme risk, members of staff are legally obliged to make such a referral; however the College has a very robust Safeguarding Team in place to handle these types of situations and, in almost all circumstances, the member of staff should immediately see the DSL or DDSL to facilitate this process; only in exceptional circumstances should the individual staff member make a referral to the CSC without the DSLs involvement. Staff are legally obliged to challenge any inaction and follow this up with the DSL and CSC as appropriate. The DSL and DDSLs liaise with safeguarding partners and other agencies in line with *Working Together to Safeguard Children* and follow NPCC guidance [When to call the police](#).

3.3 The referral

A referral for a student who is in immediate danger or at risk of harm must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and CSC. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made.

The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff are legally obliged to challenge any inaction and follow this up with the DSL and the CSC as appropriate; the DSL should challenge any inaction with the CSC.

In addition, if after a referral the student's situation does not appear to be improving the DSL should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the student's situation improves.

The DSL will continue to review the student's case and determine whether the student needs to stay within Ashbourne's Safeguarding Referral category (see 3.11). Irrespective of whether the student's situation improves, once a student has met the criteria to be referred to the CSC, the DSL will continue to monitor the student's progress throughout their time at Ashbourne. However, as the student continues to improve their Safeguarding category is likely to change, and, as a result, the frequency in which the DSL organises a check-in meeting with the individual will reduce. The DSL and Director of Studies meet once per week to update the Safeguarding database. None the less for all safeguarding the DSL is alerted as the situation demands.

Anyone involved in this process must ensure that concerns, discussions and decisions made, and the reasons for those decisions, are recorded and stored in the Safeguarding database.

Referrals following an allegation against a member of staff will be dealt

with in accordance with the procedures set out in clause 4.

3.4 Advice for staff when meeting with students

It takes a lot of courage for a student to disclose that they are being neglected and/or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault. To help ensure the effectiveness of such interactions with students, the College encourages staff to do the following:

- Listen carefully to the student and keep an open mind to the information being shared. The member of staff should not take a decision as to whether or not the abuse has taken place;
- Not start their own investigation;
- Not ask leading questions, i.e. a question which suggests its own answer. Instead, use TED (tell, explain, describe) to clarify the information shared;
- Remain calm and not over-react to the information relayed by the student. Staff should note that the student may stop talking if they feel they are upsetting the person listening.
- If the information shared by the student includes an online element, staff members should be aware of searching screening and confiscation advice and UKCCIS sexting advice. The key consideration is for staff not to view or forward illegal images of a student but to confiscate any device which they believe, with good reason, to have any such images stored on it, and pass the device immediately to the DSL.
- Not to be afraid of silences – remember how hard this must be for the student.
- At an appropriate time, tell the student that in order to help the safeguarding process information must be shared with the DSL.
- Avoid admonishing the student for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be your way of being supportive but the

student may interpret that they have done something wrong.

- Tell the student what will happen next. The student may agree to go with the staff member to see the DSL. If that is not the case, the staff member should let the student know that the DSL will follow-up with them asap.
- Reassure the student that the allegation/concern will be taken seriously and ensure they are offered appropriate support.
- All concerns, discussions and decisions (together with reasons) made should be shared with the DSL using the Safeguarding share option in the FileMaker Database system.
- Know that they have a professional and legal responsibility to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL and CSC. Take advice as necessary from the DSL if unsure about with whom information should be shared.
- Seek support if feeling distressed.
- Where the disclosure relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present; preferably one of them being the DSL or a DDSL. All staff should be familiar with Part 5 of KCSIE 2021 (child on child sexual violence and sexual harassment) and the College's [Peer-on-Peer Abuse Policy](#).

3.5 Respecting the student's wishes; age and circumstances in which authorities must be alerted

Where there is a safeguarding concern, the College will ensure the student's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The College always operates its processes with the best interests of the student at heart, to enable the student to achieve the best outcome. The DSL will consider carefully how to manage the student so that they are able to express their views and give feedback in the most supportive environment, and, therefore, the

College respects that students may feel comfortable expressing their thoughts with different members of staff. However, depending upon the age of the individual and the information being shared, the College may have to take action that is against the student's wishes. In these cases the DSL will ensure they consult with CSC to ensure that the decisions made by the College are the most appropriate to support the student.

3.6 Context

All staff, but especially the DSL and DDSLs, will consider the contexts in which safeguarding incidents and behaviour occur, how they can be associated with factors outside the College, and/or occur between children outside of the College. Assessments of students should consider whether and/or how wider environmental factors in a student's life are a threat to their safety and/or welfare. This includes students being at risk of abuse or exploitation in situations outside their families such as (but not limited to) sexual exploitation, criminal exploitation and serious youth violence. The College will share as much information with CSC as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

3.7 Safeguarding supersedes Data Protection

Ashbourne spends a lot of time to ensure that it protects the data of individuals. For more information about how this works, please view the College's [Data Protection Policy](#). Nevertheless, in cases relating to Safeguarding it is important to note that Safeguarding supersedes Data Protection when it comes to important decisions; safeguarding trumps data protection.

The guidance, Information Sharing: Advice for Practitioners Providing safeguarding Services to Children, Young People, Parents and Carers, supports staff who have to make decisions about sharing information. Fears regarding sharing information under the Data Protection Act 2018 and the GDPR should not stand in the way of the need to maintain welfare and protect the safety of students. If in doubt about what information can and should be shared, staff should speak to the DSL.

The College will co-operate with police and CSC to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of *Working together to safeguard children*.

3.8 Confidentiality

All staff understand that any matter relating to Safeguarding or child protection issues warrants a high level of confidentiality, not only out of respect for the student and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Staff must not promise the confidentiality of the information shared by the student and must always act in the best interests of the student. Concerns raised must be shared with the DSL and CSC where appropriate.

Staff should only discuss concerns directly with the DSL or DDSLs or Principal. The Safeguarding Team will then decide who else needs to have access to the information and they will disseminate it on a 'need-to-know' basis.

3.9 Notifying parents; age and student data protection

The College will normally seek to discuss any concerns about a student 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 College believes that notifying parents could increase the risk to the student 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 student, even if this means making a referral against the parents' wishes.

3.10 Peer-on-peer/child-on-child abuse, including bullying, cyberbullying, sexual violence and sexual harassment

All staff should be aware that safeguarding issues can often manifest themselves as peer-on-peer abuse. Please refer to clause 8.7 for further information relating to peer-on-peer abuse.

3.11 Safeguarding records

3.11.1 Keeping records

All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing. Information will be kept confidential and stored securely.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

Records kept until a student's 25th birthday

We will keep a student's file as ongoing until their 25th birthday in the following cases:

1. There has been direct involvement of Social Services, Child Social Care, Mental Health Services (e.g. CAMHS or Adult Mental Health Services) or the police. This does not include consultations that have taken place on a no-named basis.
2. A Child Protection File exists for the student.
3. Allegation of abuse (including rape) made for or against the student.

After their 25th birthday the student's record will be deleted.

Records kept until a student's 21st birthday

We will keep a student's file as ongoing until their 21st birthday in the following cases:

1. Where there have been concerns about a student's welfare but no direct involvement with Social Services, Child Social Care, Mental

Health Services (e.g. CAMHS or Adult Mental Health Services) or the police.

In this instance, concerns about welfare are usually focused on students who have had a history of self-harm or eating disorders for which they have required medical intervention. The college will not keep ongoing files for students who have received private counselling.

After their 21st birthday the student's record will be deleted.

Records kept until a student leaves the college

We will keep a student's file as ongoing until they leave the college in the following cases:

1. They have had a record created on the Ashbourne Safeguarding Database.

Their record will be deleted on the last Friday in August after they have completed their studies. As soon as a student leaves the college their Safeguarding category will become "no concern".

3.11.2 Disclosing records

If students are on the Ashbourne Safeguarding Database and it is deemed that future institutions would benefit from having access to the notes we have made on this database, the following will apply:

1. If the student is under the age of 18 when they leave the college, Ashbourne will proactively find out where they are studying and send on any Child Protection Files or relevant safeguarding notes to the new DSL. These files will be deleted from the college system in line GDPR regulations once receipt of the files are confirmed by the new school
2. If the student is over the age of 18, Ashbourne will only forward notes onto the DSL at the new education provider when we are requested for a reference. The college will typically provide this information in consultation with the student.

4. Procedures for handling concerns and/or allegations against staff members

Ashbourne aims to create a secure environment for everyone in the College community and a culture of openness, trust and transparency. This requires being able to identify concerning, problematic and inappropriate behaviour early in order to reinforce what is expected acceptable behaviour and to minimise the risk of abuse.

All staff members should understand what constitutes good practice (7.1.2), what abuse of trust and inappropriate relationships look like (7.1.1) and be familiar with expected behaviour as set out in the [Staff Code of Conduct](#).

4.1 Risk of harm

How to raise a safeguarding concern or allegation about a member of staff, including volunteers and supply staff, who may pose a risk of harm to students.

Any concerns or allegations about a staff member, including volunteers and supply staff, who may pose a risk of harm to students must be referred immediately to the Principal, who will instruct the DSL. The Principal will ensure, where appropriate, that consultation is arranged with the LADO and other external agencies to seek further guidance. Safeguarding concerns/allegations about the Principal, who is also the sole proprietor, should be reported directly to the LADO.

4.1.2 When procedures must be followed

The College's procedures for handling concerns or allegations made against staff members, including volunteers and supply staff, will be used when a member of staff has:

- Behaved in a way that has harmed a student, or may have harmed a student;
- Possibly committed a criminal offence against or related to a student;
- Behaved towards a student or students in a way that indicates he or

she would pose a risk of harm to students;

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, whether at the College or elsewhere.

All such allegations must be dealt with as a priority without delay. However, no investigation will commence without the College first speaking to the LADO.

Allegations against a teacher who is no longer teaching and historical allegations will be referred to the CSC and/or police. It is a legal obligation to inform the Disclosure and Barring Service, the National College for Teaching and the Teaching Regulation Agency. Nevertheless, before doing so, the DSL will seek advice from the LADO.

4.1.3. Reporting an allegation against a staff member

Where an allegation or complaint is made against a staff member, including volunteers and supply staff, the matter should be reported immediately to the Principal. The principal will ensure that the allegation is discussed immediately with the DSL/DDSL before further action is taken.

Where an allegation or complaint is made against the Principal, the matter should be reported immediately to the NSD and the LADO, without first notifying the Principal. The DSL will ensure that the allegation will be discussed immediately with the LADO before further action is taken. The DSL will also consult with the NSD, and vice versa.

Where an allegation is made against the DSL, the matter should be reported immediately to a DDSL, Principal or the NSD. If the matter is reported to the DDSL or NSD, they must ensure that the Principal is notified immediately. The Principal will ensure that the allegation will be discussed immediately with the LADO before further action is taken. The Principal will also consult with the NSD, and vice versa.

4.1.4. Disclosure of information

The Principal will inform a member of staff of any allegation raised

against them as soon as possible after the LADO has been consulted.

The parents of the students involved will be informed of the allegation as soon as possible if they do not already know of it. They will also be kept informed of the progress of the case, including the outcome, but not the detail of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidentiality and data protection and the advice of external agencies.

Where the LADO advises that a strategy discussion is needed, or the police or CSC need to be involved, the parents or carers will not be informed until these agencies have been consulted and it has been agreed what information can be disclosed.

The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

4.1.5. Further action to be taken by the College

The College has a duty of care towards its employees and as such it must ensure that effective support is provided for anyone facing an allegation. The College will take action in accordance with Part four of KCSIE (2021) and the College's employment procedures.

4.1.6 Ceasing to use staff

If the College ceases to use the services of a staff member because they are unsuitable to work with children, a settlement/compromise agreement will not be used to avoid a referral to the Disclosure and Barring Service which will be made as soon as possible if the criteria are met. Any such incidents will be followed by a review of the safeguarding procedures within the College, with a report produced by the DSL and shared with the NSD, DDSLs and Principal.

If a member of staff tenders their resignation, or ceases to provide their services, any child protection allegations will still be followed up by the

College in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible if the criteria are met.

Where a teacher has been dismissed, or would have been dismissed had they not resigned, separate consideration will be given as to whether a referral to the National College for Teaching and Leadership and the TRA should be made.

4.1.7. Unsubstantiated, false or malicious allegations

Where an allegation by a student or other member of staff is shown to have been deliberately invented or malicious, the Principal or Director of Studies will consider whether to take disciplinary action in accordance with the College's [Student Behaviour and Exclusions Policy](#) or [Staff Code of Conduct](#).

Where a parent has made a deliberately invented or malicious allegation the Principal or Director of Studies will consider whether to require that parent to withdraw their child or children from the College on the basis that they have treated the College or a member of staff unreasonably.

Whether or not the person making the allegation is a student or a parent (or staff member or other member of the public), the College reserves the right to contact the police to determine whether any action might be appropriate.

4.1.8. Record keeping

Details of allegations found to be malicious will be removed from personnel records.

For all other allegations, full details will be recorded on the confidential personnel file of the person accused. The record will be retained at least until the individual has reached normal pension age or for a period of ten years from the date of the allegation, if this is longer.

An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references. In accordance with KCSIE (2021), a

history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

4.2 How to raise a 'low level' safeguarding concern or allegation about a staff member, including volunteers and supply staff, where the concern or allegation does not meet the harms threshold.

Any 'low level' concerns or allegations about a staff member, including volunteers and supply staff, should be referred to the DSL or DDSL. If there are concerns about the DSL, these should be raised with the Principal. The LADO can also be consulted on a no-named basis.

4.2.2 When procedures must be followed

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that a staff member, or anyone working on behalf of the College, may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the harms threshold, as set out in 4.1.2 above, or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour may include, but are not limited to:

- being over friendly with students;
- having favourites;
- taking photographs of students on their mobile phone;
- engaging with a student on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might

not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns are shared responsibly and with the right person, and recorded and dealt with appropriately, and early. It is important that staff feel confident to self-refer when they feel a situation may be misconstrued or if they have behaved in a way that falls below professional standards.

Raising concerns early ensures that they can be dealt with effectively in order to reduce the possibility of harm, reinforce expected acceptable behaviour, as well as to protect staff from potential false allegations or misunderstandings.

All staff should be familiar with the College's Staff Code of Conduct.

4.2.3 Sharing 'low level' concerns or allegations

Where a 'low level' concern or allegation about a staff member is shared, including volunteers and supply staff, the matter should be reported to the DSL or DDSL. Where a concern or allegation is raised against the DSL, the matter should be reported to the Principal.

4.2.4 Responding to 'low level' concerns or allegations

In order to determine appropriate action, if any, the DSL, will collect as much information as possible, speaking directly to the person who raised the concern, unless anonymous, and to the individuals involved and any witnesses, if relevant. The information collected will help categorise the type of behaviour, with reference to relevant guidance and set out any action required. All information gathered, rationale for decisions and action taken will be recorded.

Any concerns or allegations that border or the harms threshold will be raised with the LADO for guidance.

5. Procedures for dealing with concerns regarding the safeguarding

practices in the College

When a member of the Ashbourne community has concerns about poor or unsafe practices and potential failures in the College's safeguarding systems, these should be initially raised directly to the DSL or DDSLs.

5.1 Whistleblowing

If staff feel unable to raise an issue with the staff members detailed above or feel that their genuine concerns are not being addressed, they should refer to the whistleblowing procedures which are set out in the College's [Whistleblowing Policy](#). This may result in the staff member using other whistleblowing channels, such as the NSPCC whistleblowing advice line (see Appendix 5).

There will be no disciplinary action taken against a member of staff for raising such a concern provided that it is done in good faith.

5.2 Complaints about safeguarding practices from students and parents

All complaints and concerns will be considered carefully by the College and appropriate action will be taken in line with the College's [Complaints Policy](#). Where parental or student complaints raise safeguarding concerns about a member of staff, the person to whom the complaint was initially communicated must follow the procedure set out in clause 4.3, as well as follow the relevant procedures set out within the Complaints Policy.

Every student should feel able to raise concerns with a member of staff whom they trust. Staff who hear about concerns, suspicions or allegations from a student must relay the concerns immediately to the DSL or DDSL.

6. Management of safeguarding – pro-active measures

The College aims to create an environment where students are safe to learn and develop. This section looks at what pro-active measures Ashbourne takes to ensure that the College safeguards its students effectively.

6.1 Induction

6.1.1 Staff induction

To manage the students effectively, as part of their induction new members of staff will meet with the DSL to:

- Go through this policy, focusing on the following areas:
 - Staff responsibilities (see 7.1)
 - What to do in the event of a safeguarding concern or allegation and how to log a safeguarding issue (see 3.1)
 - The role and identity of the DSL and DDSLs (see Appendix 2)
 - Key contextual safeguarding issues that are relevant for Ashbourne
- Go through part one of KCSIE (2021) and Annex A;
- Make them aware of other key policies that are connected to this policy (see 1.2)

New staff will also have to complete the following training before the end of their first two terms of employment at the College:

- Training on PREVENT, fire aid and fire safety
- e-Safety and Acceptable use of ICT awareness – see policies
- Induction will be completed before a member of staff begins any work for the College that involves contact with students.

6.1.2 Student induction

To ensure that students know what support Ashbourne offers. During their induction they will meet with either the DSL or a DDSL and will be informed about:

- The key members of the Safeguarding Team.
- What to do if they have any safeguarding concerns.
- The [Lanyard and ID Policy](#).
- [Student Behaviour and Exclusions Policy](#), [E-Safety Policy](#) and [Acceptable Use of ICT Policy](#).

6.2 Training

The Principal is responsible for ensuring that all staff undergo safeguarding and child protection training (including online safety) at induction and regular updates. The DSL will be responsible, in consultation with the Principal and DDSLs, for planning and delivering training.

6.2.1 Staff training

It is important that all staff have training to enable them to recognise the possible signs of abuse, neglect and mental health issues to know what to do if they have a concern. In addition to the training they receive at induction, the DSL will ensure that all staff are given the necessary training to be able to fulfil their duties. This will include:

- Attending the INSET day on the Friday before the first day of the Autumn Term. During this training session, staff will receive a refresher training session in key Safeguarding issues, including PREVENT.
- The DSL and DDSLs receive updated child protection training at least every two years to provide them with the knowledge and skills required to carry out their role. For more information about the training required for the DSL position, please refer to Appendix 2.
- The NSD and the Principal will undertake appropriate training in accordance with the LSCB's recommendations to fulfil their role and duties.
- Staff are also made aware of any news regarding safeguarding by means of emails from the DSL throughout the year.
- Mental health training awareness courses.

6.2.2 Student Council training

The College believes it is critically important for the students to take an active role in safeguarding. To help facilitate this, in the Autumn Term the DSL will organise for all members of the Student Council to receive safeguarding training.

6.3 Meetings

There are a number of meetings that take place throughout the year that

help to ensure that the College is taking pro-active measures to safeguard students.

6.3.1 Bi-annual safeguarding meetings

The DSL, DDSLs, NSD and Principal, as well as other members of the Safeguarding Team, meet a bi-annual basis (December and June). During these meetings, which are chaired by the DSL, the Safeguarding Team review events of the past six months.

The June meeting is also the Annual Safeguarding Meeting, where the DSL will ensure that all members of the Safeguarding Team attend.

6.3.2 Termly meetings of the Board of Directors

The Principal, NSD and Director of Studies (also a DDSL) have a termly management meeting to review all aspects of the College. One of the key agenda points for this meeting is safeguarding. Any relevant points discussed in relation to safeguarding will be communicated to the DSL immediately after the conclusion of the meeting.

6.3.3 Personal Tutor meetings

Each Wednesday a Personal Tutor meeting takes place between each of the Year 12 Personal Tutors. During this meeting a variety of issues are discussed to help support students, and safeguarding is a key agenda point. The Deputy Heads of Sixth Form (Amy Youngman and Sean Pillai) who chair these meetings, will ensure that at the end of the meeting any safeguarding concerns are immediately communicated to the DSL.

6.3.4 Head of Faculty meetings

Regularly throughout the academic year, a Head of Faculty meeting takes place with heads from each of the eight facilities at the College. During these meetings a variety of issues are discussed to help support teachers to improve the provision of education offered to students. The DSL will attend these meetings to get updates on any safeguarding issues that are raised. The Leader of Faculties (James Wykes) who chairs these meeting, will ensure that, on occasions when the DSL is unable to attend, at the end of the meeting any safeguarding concerns are immediately

communicated to her.

6.3.5 Daily meetings and communication

The DSL and Director of Studies (DDSL) communicate on a daily basis to discuss relevant safeguarding concerns.

6.3.6 Safeguarding must be an agenda point at all meetings

The person responsible for chairing any meetings that take place at Ashbourne is expected to have safeguarding as one of the agenda points. At the end of the meeting, if any safeguarding concerns are highlighted these must be immediately communicated to the DSL.

6.4 Positive promotion

Safeguarding will be promoted positively throughout College in a number of ways, including:

- Relevant policies available on the College website, on the Student and Parent Portals and the FileMaker database system, which is accessible to all staff members.
- Posters around the College provide key information to all members of the Ashbourne community about the College's Safeguarding Team.

6.5 Early intervention (early help)

Any student may benefit from early intervention but all staff should be particularly alert to the potential need for early help for a student who fits into the categories noted in clause 3.2.

Early intervention can take many forms, such as:

- College-based programmes
- Mentoring schemes
- Additional pastoral or safeguarding support.

At Ashbourne, early intervention mainly involves College-based programmes and mentoring schemes. This involves providing support as soon as a problem emerges, and consultation with the local authority

Early Help Team. All staff should be aware of the early intervention process, and understand their role in it. This could include: identifying emerging problems, for example dramatic weight loss, liaising with the DSL, 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. As stated previously in this policy, Ashbourne has a relatively small student body and therefore the DSL has the capacity to manage all of the early intervention programmes; however, the DSL may well delegate individual students to a DDSL, Personal Tutor or in certain cases teachers. In the case when the DSL delegates this responsibility to manage early intervention to another member of staff, she will continue to monitor that individual to ensure that she is confident that the student's case is being managed effectively.

All staff should be prepared to identify students who may benefit from early help, be aware of the early help process and understand their role in it. This is part of the intervention procedure at Ashbourne. If early help is appropriate, the DSL should support staff in liaising with other agencies and setting up an inter-agency assessment as appropriate. If early help or other support is appropriate, the case should be kept under constant review and consideration given to a referral to CSC if the student's situation does not appear to be improving.

Initially, staff who consider that a student may benefit from early intervention should discuss this with the College's DSL, by logging their concern using the Safeguarding Share option on the FileMaker database, which the DSL will then follow up (see clause 3.11) and consider what type of additional support should be offered to the individual.

Effective early intervention relies upon:

- Identifying students who would benefit from early intervention;
- Undertaking an assessment of the need for early intervention; and
- Providing targeted early intervention services to address the assessed needs of a student and, if applicable, their family which

focuses on activities to improve the outcomes for that student.

Where a student and their family would benefit from coordinated support from more than one agency (e.g. education, health, police) there should be an inter-agency early help assessment. This should identify what help the student and their family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. If Early Intervention is appropriate and where they are not taking the lead, the DSL will support the member of staff liaising with other agencies and setting up inter-agency Early Intervention assessment as appropriate.

Decisions as to who performs this role will be taken on a case-by-case basis and the College will consider carefully which member (s) of staff will be most effective for the individual student and their family.

For an Early Intervention assessment to be effective:

- It should be undertaken with the agreement of the student and their parents or carers and should involve the student and their family as well as all of the professionals who are working with them;
- A member of staff, invariably the DSL, should be able to discuss concerns they may have about a student and their family with a social worker in the local authority; and
- If students and/or their parents do not consent to an early intervention assessment, then the DSL should make a judgment as to whether, without help, the needs of the student will escalate. If so, a referral to CSC may be necessary.

Effective early intervention involves the College (under the guidance of the DSL) providing high quality support as soon as possible, in cooperation with or coordinating with other agencies as appropriate, to help address the assessed needs of the student and their family, in order to significantly improve the outcomes for the student. However, each case should be kept under constant review, and consideration should be given to a referral to CSC if the student's situation does not appear to be

improving.

6.5.1 Half-termly reports – feedback about student progress

Each student and their parents receive reports from each of the relevant teachers four times throughout the year. These reports enable the College to see if students are underperforming and then seek to understand the reasons why that is the case. The DSL may liaise with all teachers to get updates and to identify whether any students are eligible for early intervention. In particular the DSL will work closely with the Deputy Head of Administration who proof reads all reports.

6.5.2 Structure of the College

Ashbourne's small class sizes (no more than 10 students) enable teachers to better understand their students and to identify any concerns in relation to safeguarding, in particular those students that are suitable for early intervention.

6.6 E-Safety

The College has appropriate filters and monitoring systems in place to safeguard students from potentially harmful and inappropriate online material. Further detail of the College's approach to online safety can be found in the College's [E-Safety Policy](#).

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

Students 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 people will use these technologies to harm students. The harm might range from sending hurtful or abusive texts and emails (cyber-bullying), to enticing students 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; (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 students with distorted and unrealistic images of others' lives, causing some students 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 students 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 students; (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 [Acceptable Use of ICT Policy and Agreement](#) explain the responsibilities of staff in relation to keeping students safe in College.

The College will do all it reasonably can to limit students' 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 students from online abuse without "over blocking" or imposing

unreasonable restrictions as to what students can be taught through online education.

Students also receive guidance on safe use of the web (including anti-bullying) through the PSHEE curriculum in Year 11 and Year 12 Personal Tutor groups (see 6.10).

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

Any student may suffer from online harm and all staff should be alert to the risk of it. Indicators that a student may be being abused or harmed online overlap with other indicators of abuse which can be found in Appendix 1.

If you suspect that a student may be at risk of or suffering from online harm, follow the procedures set out in clause 3 and discuss any concerns with the DSL immediately and an agreed course of action will be made in accordance with the procedures set out in this policy.

6.7 Educational visits

The Educational Visits procedures are set out in the College's [Risk Assessment for Educational Visits Policy](#), and reflect the consideration given to the protection of our students when they are involved in educational trips and visits outside of the College's premises.

Where extended College activities are provided by and managed by the College, the procedures set out within this policy 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 students attend off-site activities, including those abroad on

educational trips, the College will check that effective child protection arrangements are in place. All staff are bound by the College's Risk Assessment for Educational Visits Policy, when arranging and organising off-site trips.

The DSL closely monitors the conduct of students and how staff manage these trips. Students and staff are asked for feedback following every trip that involves an overnight stay.

Please refer to our to the College's Risk Assessment for Educational Visits Policy, for further information.

6.8 Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have appropriate safeguards in place. To protect students, we will:

- seek their and their parents' consent for photographs to be taken or published (for example, on our website or in newspapers or publications);
- when photographs of students are published, we use only the student's first name with an image unless parents/students have consented for the student's full name to appear next to the image;
- ensure that students are appropriately dressed;
- encourage students to tell us if they are worried about any photographs that are taken of them.

Further guidance for staff on the taking and storing of photographs and images of students is contained in the Staff Code of Conduct.

From time to time professional photographers are invited onto the College to take group photographs or pictures of significant events; any professional photographers hired by the College will be subject to appropriate vetting checks.

6.9 Premises

The College will take all practicable steps to ensure that the College premises are as secure as circumstances permit.

6.9.1 Security

Visitors are to report to reception where they will sign in and be handed a red lanyard with a Visitor ID card. Safety of our students, staff and visitors is a key priority and the lanyards and ID cards play a key role in keeping all members of the community safe at all times. All members of the Ashbourne Community receive a photo ID card with their name and picture, which must be clearly displayed and worn at all times whilst on the College premises. The College's use of lanyards and ID cards allows staff and students to ascertain at a glance whether persons on site are members of the Ashbourne community. The College imposes a duty on all members of the Ashbourne community to immediately report any persons not wearing their lanyard to the relevant reception on site.

The Facilities Manager has also ensured that CCTV is installed on every floor. This enables the Reception Team to monitor the College premises more effectively and increases the chances of identifying those individuals not wearing a lanyard and ID card.

For further information, please visit the College's [Lanyard and ID Policy](#).

6.9.2 Natural light

The College has been designed in such a way where lots of natural light comes into each classroom, which we believe helps to facilitate the learning experience. This also enables staff members to feel more comfortable having one-to-one meetings with students, and enables staff members to easily be able to see what students are doing in a room if left unattended.

6.10 Safeguarding education

Students are taught how to keep themselves safe and build resilience to key issues (including radicalisation) through the Year 11 PSHEE and Year 12 Personal Tutoring classes.

As well as offering the students valuable support with their university application and A-Level studies, these programme allow the students to gain a greater depth of understanding and awareness about the following:

- British values
- Building resilience
- Peer-to-peer abuse
- Radicalisation
- Relationships and Sex Education (RSE) and Health Education
- Online safety

With online safety, cyber-bullying by students, 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](#). Students are educated about the risk of online harm – including youth produced sexual imagery, and the ways to mitigate those risks. The PT and PSHEE lessons will also aim to develop critical thinking and assessment skills to further enhance the students' own ability in making safer, more informed decisions as to the material they access online and its validity.

The College produces blogs for both the PSHEE and Personal Tutoring classes, which are accessible to students and parents on the College website and in the Student and Parent Portals.

Through these sessions teachers will ensure that the students are reminded of the College's Safeguarding procedures and the support available to them.

6.11 Looked after children

The DSL ensures that staff have the skills, knowledge and understanding necessary to keep safe any students on roll who are looked after by a local authority.

The DSL is the designated member of staff who has responsibility for their welfare and progress. The College ensures that the designated

member of staff, invariably the DSL, receives appropriate training in order to carry out their role.

6.12 Safer recruitment

The College is committed to operating safer recruitment procedures in compliance with relevant legislation and guidance and in accordance with the College's [Safer Recruitment and Selection of Staff Policy](#).

Ashbourne spends a significant amount of time to ensure the right type of individual is selected to work at the College. In addition to the mandatory checks, different members of the SLT will meet with potential staff members to ensure that the College is confident that the individual can carry out their duties to a high standard and are suitable to work with young individuals.

The College ensures that all staff, including volunteers, have an appropriate DBS and other relevant checks to meet the requirements of the Single Central Record (SCR). For further information, please visit the College's Safer Recruitment and Selection of Staff Policy.

6.13 Monitoring attendance

The College's Attendance Officer follows up carefully with student attendance each day. The Attendance Officer will follow-up on absences four times throughout the day, and report any concerns with regard to students in which she has safeguarding concerns directly to the DSL. Attendance meetings take place every two weeks, which are also attended by the DSL and at least one of the DDSL's. For further information about how the College monitors attendance, please visit the College's [Student Behaviour and Exclusions Policy](#).

6.14 Risk assessments for students

The DSL will carry out risk assessments for the following types of students:

- Joining Year 13 as a new starter.
- Joining the college when they are already 18 or over.

- Entering into Year 12 or 13 when they are under the age of 16.

Each of these students will be met individually by the DSL, or another appropriate staff member selected by the DSL, and the information will be stored on Ashbourne's Safeguarding database. As a result of these meetings, further tasks may need to be completed. Ordinarily these meetings will lead to the DSL to assign the student to either the 'no concern' or 'mild concern' category on our Safeguarding database (see clause 3.11). Where appropriate the DSL may also decide to inform the subject teachers with more information about these students.

If a student making an application discloses a safeguarding concern, the DSL or DDSLs will immediately take steps to ensure that the college may properly accommodate the student. This would involve surveying any document provided by the previous school(s), professionals (doctors, psychologists etc) and the relevant Local Authority if a referral has been made to CSC.

It is imperative that each party is confident that Ashbourne may offer a proper provision, making any reasonable adjustments. The student and their family should agree with the college's provision for the student.

This means that the DSL will be informed of all new registrations to ensure there are no safeguarding concerns or, if these exist, they or one of the DDSLs will commence appropriate investigations.

In order to ensure that all students are suitably supported and in the environment best suited to their wellbeing, Ashbourne insists that all safeguarding issues which may affect any student are disclosed from the very beginning of the Registration process for the college. Ashbourne's [Admissions Policy](#) makes clear that failure to disclose known safeguarding issues during the Registration process may lead to the withdrawal of the offer of a place at the college.

6.15 Counselling

Ashbourne works with a counsellor, Rebeca Robertson, who provides

support to both our students and staff members in a confidential setting. The information shared during these meetings are not discussed with the College. If staff or students wish to receive counselling, they must contact the DSL to take this forward.

For contact details of this counselling service, please refer to Appendix 5.

6.16 SEND students

The DSL works closely with the access arrangements team, which includes the deputy DSL and the the Specialist SEND Assessor and Advisor to ensure that appropriate support is provided to those students who have a SEND.

For more information about the support Ashbourne provides to SEND students please refer to the College's [SEND and Access Arrangements Policy](#).

6.17 Overseas and independent living students

Overseas and Independent Living Students are considered as a potentially vulnerable group. Additional support meetings are organised for these students to address key issues related to safety and living in London including practical help and advice such as registering with a GP. These sessions are co-ordinated by the DSL. Due to the potential vulnerability of these students living on their own they are initially registered on Ashbourne's Safeguarding database as a level 1 concern (see 3.11). After an initial meeting with the DSL, unless major concerns are raised, students will generally be moved to a level 0 concern and their performance and general welfare will be monitored by their Personal Tutor.

In addition, the College, as part of its responsibility as a Tier 4 sponsor, ensures the following in relation to students whose visa it sponsors:

6.17.1. Parents must send the College a signed letter confirming the full address of where their child will be living whilst studying in the UK. This will also include details of who else will be living at the same property.

6.17.2. Where students under the age of 18 will not be living with a responsible family member, the parent must confirm further information about the person/people their child will be living with, including their age, occupation, contact details, nationality and relationship to the student.

6.17.3. Ashbourne will not issue the Confirmation of Acceptance for Studies (CAS) required for visa applications if the family does not disclose the information highlighted in points 6.17.1 and 6.17.2.

6.17.4. To ensure that any changes to living arrangements prior to the visa application continue to meet our requirements, when assisting our students with their Tier 4 visa applications and other preparations prior to relocating to the UK we will ask them once more about their proposed living arrangements in the UK. This will include asking about who they will live with and the nature of their relationship with those individuals.

6.17.5. Within six weeks of their arrival in the UK, all Tier 4 students are required to provide the College with proof of their address to confirm that the information provided in 6.17.1 above is accurate. To ensure that this happens, the College will ensure that students register with their local GP and a copy of a letter confirming their Doctor registration, including details of the students' address, will be kept on file at the College.

6.17.6. If a student under the age of 18 changes their address, the College will require another parental consent letter including the details highlighted in points 6.17.1 and 6.17.2.

6.17.7. As with all other Ashbourne students, to ensure we have accurate details about living arrangements, the College asks students to confirm their address, contact details and next of kin details twice per academic year.

7. Roles and responsibilities in managing safeguarding

7.1 All staff

All staff are required to:

- Have read and be familiar with this policy and be aware of systems, policies and procedures within the College which support safeguarding (See 1.2 Related Policies); this should be reviewed annually;
- Have read, understood and be familiar with both Part 1 and Annex A of KCSIE (2021); this should be reviewed annually;
- Immediately ensure that a direct referral is made to CSC (within one working day) if there is a risk of immediate serious harm to a student. This is a legal requirement. Due to the small size of the College, and the dedicated Safeguarding Team, ensure in this case invariably means immediately informing the DSL or a DDSL.
- After reporting a Safeguarding concern they must follow-up with the DSL and, where appropriate, the CSC to ensure that things have been followed up. This is a legal requirement.
- To keep the College informed (in particular DSL) on an on-going basis of any information that might have implications for the safeguarding of the students in the College. For example, where their relationships and associations both within and outside the workplace (including online) may have implications for the safeguarding of students at Ashbourne. This may include working with the DSL and, if required, support social workers to take decisions about individual students.
- Use the Ashbourne FileMaker database to log any concerns about safeguarding issues relating to students;
- Provide a safe environment in which students can learn, which includes ensuring that registers are completed immediately at the beginning of each class, and that students are wearing a lanyard at all times, and informing those members of the Ashbourne community on site not wearing a lanyard to immediately report to the reception of that building (see the [Lanyard and ID Policy](#) for further information);
- Be aware of the signs of abuse, neglect and radicalisation so that they are able to identify students who may be in need of extra help or who are suffering, or are likely to suffer, significant harm and in

such circumstances to take appropriate action, working with other services as needed;

- Be aware of groups of students which may be at greater risk (see clause 2.2);
- Be aware of specific safeguarding issues, such as Child Sexual Exploitation (CSE), FGM, Children Missing Education (CME), radicalisation, Peer-on-Peer abuse and child criminal exploitation: county lines (refer to clause 8 for further details);
- Attend the INSET day that will take place on the Friday before the start of the Autumn Term. During this training session, staff will receive PREVENT training, as well get a refresher training session on key safeguarding issues.
- Complete required and relevant safeguarding training as directed by the DSL within the agreed time period, and keep up-to-date with any relevant safeguarding and child protection developments.

7.1.1 Abuse of trust and inappropriate relationships

As a result of their knowledge, position and/or the authority invested in their role, all adults working with students are in positions of trust. A relationship between a member of staff and a student cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Staff should note that it is an offence for a person aged 18 or over and in a position of trust to (a) intentionally touch a child in a sexual way; (b) have a sexual relationship with a child, even if the relationship is consensual; (c) cause or incite a child to engage in sexual activity; (d) intentionally engage in sexual activity in the presence of a child; or (e) for the purposes of sexual gratification cause a child to watch a third person engaging in a sexual activity or look at an image or any person engaging in a sexual activity. A position of trust could arise even if the member of staff does not teach the student. A student for these purposes is a person under the age of 18. Note that Ashbourne does not condone any

relationship between a member of staff and a student currently in education at the College, that involves the points (a) to (e) highlighted above, irrespective of the student's age.

7.1.2 Good practice guidelines for staff

In addition to their responsibilities, we have also highlighted the following Good Practice guidelines for staff:

- All staff must behave responsibly and professionally in all dealings with students and specifically with students for whom they have a duty of care. All staff must follow the procedures set out in the College's [Staff Code of Conduct Policy](#), which includes guidance on one-to-one teaching, staff/student relationships and communication with students (e.g. via social media).
- Staff should always avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential immediately to the DSL.
- Treating all students with respect;
- Setting a good example by conducting themselves appropriately;
- Encouraging positive and safe behaviour;
- Being alert to changes in students behaviour and maintaining an attitude of 'it could happen here' where safeguarding is concerned;
- Recognising that challenging behaviour may be an indicator of abuse;
- Asking the students permission before doing anything for them which is of a physical nature (except where there is an urgent need to take action to protect them or to prevent them from harming others), such as assisting with dressing, physical support during PE or administering first aid;
- Maintaining appropriate standards of conversation and interaction with students and avoiding and discouraging the use of inappropriate sexualised or derogatory language;
- Ensuring students are encouraged to talk to staff members about any concerns, no matter how small they are and ensure that students feel comfortable doing so;

- Being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of neglect and/or abuse.
- Understand that assessments of students should consider whether wider environmental or contextual factors are present in a student's life that are a threat to their safety and/or welfare (Contextual Safeguarding).
- Understand the boundaries to employ with students in their day-to-day work, both to protect themselves and the young people in their care.

7.1.3 Meeting students on a one-to-one basis

All staff are aware of the potential risks (i.e. false allegations against staff) of meeting a young person alone, particularly if the young person has had an experience of sexual/emotional abuse. Due to the number of academic interventions that take place at the College to improve student performance, one-to-one meetings are likely to be an integral part of a staff member's role and they must exercise their own professional judgement and a degree of caution in these situations. All staff should try to ensure that they do not place themselves in any compromising situations, where allegations could potentially be made against them.

Suggested protective measures to consider include:

- Staff members should ask another person (e.g. another staff member or a friend of the student – as appropriate to the content) to sit in on the meeting.
- Staff members should sit in a room where it is possible to be observed through a window or glass-panelled door. If the staff member is not clearly visible from outside the room, they should not close the door. If there is a blind in the room, the staff member should ensure that it is not down.
- Unless in exceptional circumstances, staff/student meetings should always be conducted within normal College hours.

7.2 DSL and DDSLs

Fran Burns (DSL) takes lead responsibility for safeguarding and child protection (including online safety) at the College. As a member of the SLT, the DSL has the appropriate status and authority within the College to carry out the duties of this post. The DSL is given the time, funding, training, resources and support to provide advice and support to other staff on student welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of students.

The role principally involves:

- Managing referrals
- Working closely with external agencies, members of staff, students and parents to ensure the effective management of safeguarding at the College
- Ensuring that she is up-to-date by taking relevant training
- Raise awareness about safeguarding issues at the College
- Ensure that all information in relation to safeguarding issues is stored safely on Ashbourne's secure Safeguarding database.

The DSL is ably supported by DDSLs. The DSL ensures that the DDSLs are trained to the same standard as the DSL. Whilst the activities of the DSL can be delegated to her deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSL; this lead responsibility should not be delegated.

For further information about the DSL's role, please refer to Appendix 2.

7.3 Students

Students have a key responsibility in terms of wearing a lanyard and ID card at all times when on the College premises. The lanyard should be worn around the neck, on the front of the body and on the outermost piece of clothing.

In addition, if a student identifies another individual on Ashbourne's premises who is not wearing a lanyard and ID card, they must ask them to

report to the reception of that building immediately. This is particularly true for students who are members of the Student Council, who must set an example for other students to follow.

Students are encouraged to raise any safeguarding concerns directly with the College. In the first instance they should contact either the DSL or DDSLs. If students do not feel that their concerns are being taken seriously, they are welcome to contact outside agencies where appropriate (refer to contact details in Appendix 5).

7.4 Parents

Parents should raise any safeguarding concerns directly with the College. In the first instance they should contact either the DSL or DDSLs. If parents do not feel that their concerns are being taken seriously, they are welcome to contact outside agencies where appropriate (refer to contact details in Appendix 5).

7.5 Nominated Safeguarding Director (NSD)

The NSD is Simone Shaw. She takes leadership of the College's safeguarding arrangements on behalf of the Senior Management Team (SMT) and liaises with external agencies where this is required, including in the event of allegations of abuse made against the Principal.

The NSD will play an essential role in ensuring students are kept safe from harm. If the NSD is unavailable, her role and duties will be carried out by the Principal, except in a case where an allegation of abuse is made against the Principal himself. In these cases, the LADO will undertake this responsibility.

The NSD, Principal and Director of Studies will undertake appropriate training in accordance with the Local Safeguarding Children Board's recommendations to fulfil the role and duties. The DSL will ensure that this takes place within the required timelines.

For a full description of the role and duties of the NSD, please refer to Appendix 3.

8. Specific safeguarding issues

All staff should have an awareness of specific safeguarding issues, some of which are covered within this section. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put students in danger.

8.1 Students missing from education

Students who go missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect, which may include sexual abuse or exploitation, child criminal exploitation including involvement in county lines, mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

The College's procedures for unauthorised absence and for dealing with students who go missing from education are set out within the College's [Student Behaviour and Exclusions Policy](#), and the [Missing Child Policy](#).

Where reasonably possible, Ashbourne will hold more than one emergency contact number for each student to provide the College with additional options to make contact with a responsible adult particularly when a student is missing from College for an extended period of time.

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

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

Attendance registers are carefully monitored to identify any trends on a

daily basis. The College will report to the RBKC a student who fails to attend regularly or has been absent from College without permission for a continuous period of 10 College days or more. For further information about Ashbourne's attendance procedures, please visit the College's Student Behaviour and Exclusions Policy.

8.1.1 Informing parents

Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Principal, CSC and/or the police before discussing details with parents.

Legislation recognises a child's (legally, any student under the age of 18) right to make decisions about their own information and to express their wishes and preferences. Students 18 years of age and above have an absolute right to prohibit sharing their own personal information with their parents. If any other student requests that their parent/carer is not informed of action to be taken under these procedures we will consider their request bearing in mind the following:

- Whether informing parents would put the student at increased risk of harm
- Whether not informing parents would place the student at increased risk of harm
- Whether the student has the capacity to understand the decision they are making
- Whether any other students may be at risk of harm due to the information available to us
- Whether there is sufficient cause to override the student's wishes in the public interest.
- The College will also receive advice from CSC where required.

In relation to Channel referrals, the DSL will consider seeking the consent of the student (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues

such as the health of the individual, law enforcement or protection of the public.

8.2 'Honour based' abuse

So-called 'honour-based' violence (HBA) encompasses crimes that 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 HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a student being at risk of HBA, or already having suffered HBA.

There is a range of potential indicators that a student may be at risk of HBA. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found in the Multi agency statutory guidance on FGM and also in the Multi-agency guidelines: 'Handling cases of forced marriage'.

To give an example of indications that a student has already been subjected to FGM:

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

8.2.1 Female Genital Mutilation

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is

illegal in the UK and a form of child abuse with long-lasting harmful consequences.

There is a range of potential indicators that a student may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi-agency statutory guidance on FGM (pages 59-61 focus on the role of schools).

There is a mandatory reporting duty for all staff members in respect of FGM. Where a staff member discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a girl who is aged under 18, they must ensure that the matter is reported to the police. Therefore, members of staff must immediately inform the DSL or a DDSL and follow up to ensure that the matter has been reported to the police. Those failing to ensure that such cases are reported to the police will face disciplinary sanctions. It will be rare for a staff member to see visual evidence, and they should not examine students in this regard.

See the Home Office guidance for the Mandatory Reporting of FGM – procedural information for further details about the duty.

8.2.2 Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Ashbourne can play an important role in safeguarding students from forced marriage.

There are a range of potential indicators that a student may be at risk of

forced marriage. The Forced Marriage Unit has published Multi-agency guidelines: Handling cases of forced marriage. Pages 32-36 of this guidance focuses on the role of Colleges. Staff can also contact the Forced Marriage Unit if they need advice or information.

If staff have a concern regarding a student that might be at risk of HBA they must also refer to the guidance in clause 3.2 of this policy.

8.3 Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Terrorism is defined as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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. It can also call for the death of members of the armed forces, whether in this country or overseas.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular have become major factors in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in student's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement to identify students who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

In accordance with the Department for Education Statutory Guidance

2015: Prevent Duty, the College recognises its duty to have due regard to the need to prevent students from being drawn into terrorism and adopts appropriate protocols to minimise the risk. The DSL is the designated Prevent Duty person responsible for co-ordinating action within the College and liaising with other agencies. Although the College assesses the risk to be low at present, the College will implement prevention measures such as applying appropriate restrictions to internet sites likely to promote terrorist and extremist materials, discussing these dangers with Students when appropriate in suitable forums, and undertaking Prevent awareness staff training periodically to ensure that staff are able to identify students at risk and know how to intervene.

The DSL will also assess and manage appropriately any risks identified in the vicinity of the College, including those posed by any visiting speakers. All staff must undergo Prevent training.

8.3.1 What staff should do if a child is seen as at risk of radicalisation

Staff should follow the College's normal referral processes when there are concerns about students who may be at risk of being drawn into terrorism, as set out above (see clause 3). This may include a referral to Channel or CSC depending on the level of risk. The DSL, in recognition that students may be at risk of being drawn into terrorism or other forms of extremism, will ensure that the College carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risks in the local area. Such risk assessments are discussed with the Principal, NSD and DDSLs to ensure the College's safeguarding arrangements are sufficiently robust to help prevent and protect students from being drawn into terrorism, and are regularly revised.

8.4 Child Sexual Exploitation (CSE)

CSE 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, gifts, affection or

status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. 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. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex or sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. Some of the following signs may be indicators of sexual exploitation:

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

Any concerns that a student is being or is at risk of being sexually exploited should be communicated without delay to the DSL. The College is aware that a student may not be able to recognise the coercive nature of the abuse and may not see themselves as a victim. Consequently, the student may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other victim of abuse.

8.5 Private fostering

Children being privately fostered are required by law to be seen by a social worker. If a member of staff or volunteer becomes aware that a student may be in a private fostering arrangement, where a student under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person's home, they should raise this in the first instance with the DSL. The DSL will then contact CSC to seek further advice. As many of our students will live in different boroughs, the DSL will be required to consult with the CSC team for the particular borough where the student currently resides. The DSL will check that the arrangements are suitable and safe for the student and this is likely to involve follow up meetings with CSC.

For further information refer to the Children Act 1989: private fostering.

8.6 Domestic abuse

The cross-government definition of domestic violence and abuse is: Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological, physical, sexual, financial and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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

8.7 Peer-on-peer/child-on-child allegations of sexual violence and sexual harassment

8.7.1 Whole-school approach

Ashbourne has a zero-tolerance approach to peer-on-peer abuse of any

kind and takes all concerns and allegations very seriously.

It is vital that all staff understand the importance of challenging inappropriate behaviour between students, even if it appears relatively innocuous or takes place online and/or outside of the College environment. This is not only to prevent escalation and/or ongoing abuse but also to create a culture of accountability and responsibility. It is important to:

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

Dismissing or tolerating such behaviour risks normalising it.

Staff should assume that peer-on-peer abuse is taking place even where no concerns or allegations have been raised. Students may not find it easy to report abuse directly or at all, and so staff must remain vigilant and alert to any signs of abuse or potential abuse and inform the DSL or DDSL of any concerns, however seemingly small. Where staff have ‘reasonable cause to suspect that a student is suffering, or is likely to suffer, significant harm’, they should immediately follow the procedures set out in clause 3 of this policy. All staff should be clear on the College’s policy and procedures as set out in the [Peer-on-Peer Abuse Policy](#), and be familiar with part 5 of KCSIE 2021.

The College’s whole-school approach to safeguarding aims to mitigate against the risk of peer on peer abuse and also includes educating students to understand and recognise unacceptable behaviour and what to do about it through the Year 11 PSHEE programme and the Year 12

Personal Tutoring programme. Within the scheme of work for these taught classes, lessons include: Consent and Healthy Relationships, as per RSE education guidance, peer-on-peer abuse, anti-bullying and online risk and safety awareness.

8.7.2 Sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two students of any age and gender. It can also occur through a group of students sexually assaulting or sexually harassing another student or group of students. Students who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment too. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal), inside or outside the College, and are never acceptable.

8.7.2.1 Consent

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

8.7.2.2 Sexual violence

Sexual violence, which includes rape, sexual assault and assault by penetration, are criminal offences under the Sexual Offences Act 2003 for which perpetrators may face criminal investigation and charges.

8.7.2.3 Sexual harassment

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. It is likely to violate a student's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment may also lead to criminal investigations and charges, as per the Sexual Offences Act 2003.

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

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

8.7.2 Who is most at risk of sexual violence and sexual harassment?

Any report of sexual violence or sexual harassment must be taken very seriously. Staff should be aware, however, that some groups are potentially more at risk to sexual violence and sexual harassment. Evidence shows girls, students with SEND and students who identify as members of the LGBTQ+ community are at greater risk.

The DSL, who works closely with the access arrangements team, ensures that all SEND students are on the safeguarding database and that they receive the appropriate level of support. For more information about the support Ashbourne provides to SEND students please refer to the College’s [SEND and Access Arrangements Policy](#).

Staff should also be aware that perpetrators of sexual violence and sexual harassment are more likely to be boys, and should be alert to related safeguarding factors that may lead them to behave in such a way.

8.7.3 How students can raise concerns and/or allegations about their own experiences and/or those of others.

All concerns and/or allegations of sexual violence and sexual harassment will be taken seriously and dealt with sensitively, with appropriate and timely action and support.

1. Students should first speak with either their personal tutor, another trusted member of staff or the DSL.
2. Where concerns and/or allegations raise issues of actual harm or risk of harm to a student, the attending member of staff has a legal duty to notify the DSL. Where appropriate the DSL will consult with external agencies and will ensure students are kept informed.

8.7.4 Responding to concerns and/or allegations

In the event of disclosures about peer-on-peer abuse, all students involved (both alleged victim and alleged perpetrator) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the DSL and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- the alleged perpetrator; and
- the other students (and, if appropriate, staff) at the College.

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report.

The DSL will consider the risks posed to students and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, and sharing College premises.

A student against whom an allegation of abuse has been made may be neutrally suspended from the College during the investigation. The College will take advice from CSC on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged victim and perpetrator. If it is necessary for a student to be interviewed by the Police in relation to allegations of abuse, the College will ensure that, subject to the advice of CSC, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the College and advice will be sought as necessary from CSC and other external agencies (e.g. the Police) as appropriate.

Where an allegation of sexual abuse, exploitation or grooming is made against a student, both the victim and the alleged perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed.

8.8 The sharing of youth produced sexual imagery (sexting)

The practice of students sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given students 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 schools 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 outlined in clause 3 and refer this information immediately to the DSL. 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, delete, copy or print the imagery.

The DSL should hold an initial review meeting with appropriate staff members and subsequent interviews with the students 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 student 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, staff should follow the procedures set out in clause 3 of this policy. This will involve the DSL contact CSC to make referrals where appropriate.

Immediate referral at the initial review stage should be made to CSC 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. This may involve consultation with CSC, other external agencies (e.g. the Police) and members of the Safeguarding Team.

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 CSC. Otherwise, the situation will be managed within the College.

The DSL will log all incidents of sexting, including both the actions taken, actions not taken, reasons for doing so and the resolution, onto Ashbourne's Safeguarding database.

8.9 Child criminal exploitation (county lines): Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: organised criminal networks or gangs groom and exploit children and young people to carry illegal drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

8.10 Children and the court system

Students are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are age appropriate guides to support students (12-17 year olds) available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the

courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The College may refer some parents and carers to this service where appropriate.

8.11 Children with harmful behaviour

There will be occasions when students' behaviour warrants a response under child protection rather than anti-bullying procedures. All such instances must be reported to the DSL and will be dealt with in accordance with the procedures set out in clause 3.

The management of children and young people with harmful behaviour (including sexually harmful behaviour) can be complex and the College will work with other relevant agencies to maintain the safety of the whole College community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator – i.e. all students involved will be treated as being "at risk".

Students against whom an allegation of abuse has been made may be neutrally suspended from the College during the investigation. The College will take advice from CSC on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the students accused of abuse.

If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, the College will ensure that, subject to the advice of CSC, the student's parents are informed as soon as possible and that the student is supported during the interview by an appropriate adult. In the case of students whose parents are abroad, subject to separately satisfied risk assessments for the student and an identified Education Guardian, the student's Education Guardian will be requested to provide

support to the student and to accommodate them if it is necessary to suspend them during the investigation.

8.12 Upskirting

'Upskirting' became a specific criminal offence under the Voyeurism (Offences) Act 2019 on 12 April 2019.

It typically involves taking a photograph under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) for sexual gratification or causing humiliation, distress or alarm. Anyone of any gender can be a victim. The revised version of Keeping Children Safe in Education lists upskirting as one example of peer-on-peer abuse of which school staff should be aware.

Appendix 1 – Signs and types of abuse

All College 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.

A1.1 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.

A1.2 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.

A1.3 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 non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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. Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include non-consensual sharing of sexual images and videos

and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

A1.4 Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

A1.5 Psychological abuse – includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse or isolation.

A1.6 Self-neglect – is not a direct form of abuse but staff need to be aware of it in the general context of risk assessment/risk management and to be aware that they may owe a duty of care to a vulnerable individual who places him/herself at risk in this way. Risk to self and/or others – This may include but is not exclusive to self-harm, suicidal tendencies or potential risk of harming others, which may or may not include children. This may be as a consequence of an individual experiencing a significant level of personal, emotional trauma and/or stress and mental health issues.

A1.7 Discriminatory abuse – includes racism, sexism or discrimination based on a person's disability. Financial or material abuse – includes theft, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions or benefits. Safeguarding – includes promotion of health and well-being

as well as protection of specific individuals.

A1.8 Teenage relationship abuse – Teenage relationship abuse is a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner. This abuse may be child sexual exploitation.

Appendix 2: Role of the Designated Safeguarding Lead (DSL)

When compiling this role, the College has referred directly to the KCSIE (2021) document.

A2.1 Designated Safeguarding Lead

Fran Burns is the Designated Safeguarding Lead (DSL) at Ashbourne College. She takes responsibility for all safeguarding and child protection (including online safety; see Annex B below) issues at the College. As a member of the Senior Leadership Team (SLT), she has the appropriate status and authority within the College required to carry out the duties of this post. She is given the time, funding, training, resources and support necessary in order for her to provide advice and support to other staff on student welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of students.

A2.2 Deputy Designated Safeguarding Leads (DDSL)

The DSL is supported by two Deputy Designated Safeguarding Leads, Ruchi Agarwal and Lee Kirby, who are trained to the same standard as the DSL. Whilst the activities of the DSL can be delegated to her deputies, the ultimate lead responsibility for child protection, as set out in this policy, remains with the DSL; this lead responsibility should not be

delegated.

A2.3 DSL key responsibilities:

1. Managing safeguarding referrals
2. Working with others, externally and internally, to ensure effective safeguarding at the College
3. Undertaking relevant training at least once every two years and ensure that others also receive training, updating as appropriate
4. Raising awareness about safeguarding issues and providing appropriate training for staff at the College
5. Keeping safeguarding information secure

A2.3.1 Managing referrals

The DSL is expected to:

- refer cases of suspected abuse to the local authority Children's Social Care as required;
- support staff who make referrals to local authority Children's Social Care;
- refer cases to the Prevent team to conduct an appraisal for the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service and the TRA (Teachers' Regulatory Agency as required;
- inform the LADO of any allegations of staff abuse;
- refer cases where a crime may have been committed to the Police as required.

The DSL has the discretionary powers to contact the Local Authority Designated Officer on any matter the DSL considers cannot be properly dealt with internally, as well as to seek external advice from appropriate companies or legal services.

A2.3.2 Work with others

The designated safeguarding lead is expected to:

- act as a point of contact with the RBKC and any other related outside agencies;
- liaise with the principal to inform him of issues – especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
as required, liaise with the “case manager” and the LADO for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, Facilities Team, and members of the SEND Team) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff;
- organise regular (weekly) safeguarding update meetings with SLT members and an annual meeting that involves reviewing the Child Protection and Safeguarding Policy and procedures.
- in consultation with other members of the SLT, assess and verify new employee suitability to work with young individuals, attending interviews where necessary, in compliance with relevant legislation, Government guidance and the College’s [Safer Recruitment and Selection of Staff Policy](#).

A2.3.3 Training

The DSL, and any deputies, will undergo training to provide them with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children’s social care, so they have the knowledge and skills required to carry out the role. The DSL will also undertake Prevent awareness training. Such training, which will be updated at least every two years, will enable the DSL (and deputies) to:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local

authority children's social care referral arrangements; further details provided in Chapter 1 *Working Together to Safeguard Children*;

- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the College's Child Protection and Safeguarding Policy and Procedures, especially new and part time staff;
- be alert to the specific needs of children in need, those with special educational needs and young carers; this includes those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children (Section 17(10) Children Act 1989);
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- understand the importance of information sharing, both within the College, and with safeguarding partners, other agencies, organisations and practitioners;
- be able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the College with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- be able to 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;
- be able to 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;

- obtain access to resources and attend any relevant or refresher training courses and encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other DSLs or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

A2.3.4 Raising awareness

The DSL should:

- ensure the College's Child Protection and Safeguarding Policy and related policies are known, understood and used appropriately;
- ensure the College's Child Protection and Safeguarding Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the College's Child Protection and Safeguarding Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the College in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements;
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and College leadership staff. Their role could include ensuring that the College, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in

this group might face and the additional academic support and adjustments that they could make to best support these children.

A2.3.5 Keeping safeguarding information secure: child protection file

Throughout the academic year the DSL will maintain detailed, accurate and secure written records of concerns and referrals on the safeguarding database.

Where children leave the College the DSL should ensure their Child Protection File is transferred to the new school or college as soon as possible. This should be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained. These files will then be deleted. Receiving schools and colleges should ensure key staff such as DSLs and SENDCos or the named person with oversight for SEND in colleges, are aware as required.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or College in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

In line with our [Data Protection Policy](#), all child protection files will be held by the College until the student's 25th birthday, after which the files will be destroyed.

A2.7 Availability

During term time the DSL (or a deputy) should always be available (during College hours) for staff in the College to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) would be expected to be available in person there may be occasions and circumstances where communication can be made via phone or other secure and acceptable online communication media.

Ashbourne's regular safeguarding support takes place during term time

only. However, in order to offer clear guidance to our students and their families/carers we advise them on where to access emergency support, if required, during school holidays and out of hours. During all official holidays, this [Out of Hours Statement](#) is clearly displayed on the College website.

Appendix 3: Role and duties of the Nominated Safeguarding Director

The NSD is Simone Shaw. She takes leadership of the College's safeguarding arrangements on behalf of the Senior Management Team and liaises with external agencies where this is required, including in the event of allegations of abuse made against the Principal.

The NSD will play an essential role in ensuring students are kept safe from harm. If the NSD is unavailable her role and duties will be carried out by the Principal, except in a case where is an allegation of abuse made against the Principal. In these cases, the LADO will undertake responsibility.

The NSD and the Principal will undertake appropriate training in accordance with the Local Safeguarding Children Board's recommendations to fulfil the role and duties.

The main role and duties of the Nominated Safeguarding Director are to:

- Be familiar with the LSCB guidance and procedures relating to safeguarding and child protection and associated issues, and to attend training for nominated safeguarding and child protection governors, where available;
- Ensure that the SMT put in place a suitable safeguarding and child protection policy and associated procedures which have regard to regulations and standards issued by the Secretary of State for Education (DfE) in accordance with section 94 of the Education and Skills Act 2008 and sections 29 and 38 of the Counter- Terrorism and Security Act 2015 and associated regulations;
- Champion safeguarding and child protection issues within the College;

- Encourage members of the SMT and SLT to develop their understanding of the SMT and SLT responsibilities with regard to child protection and assist them to perform their functions in respect of safeguarding children and young people;
- Contribute to ensuring any deficiencies in the College's safeguarding practices which may be brought to the SMT's attention by a member of College staff, a parent, an officer of the local authority or from any other source are addressed;
- Meet regularly with the College's DSL in order to monitor the effectiveness of the College's Child Protection and Safeguarding Policy and the implementation of the policy and procedures in the College. Meetings will take place, at minimum, on a termly basis;
- Ensure that the SMT receive an annual report on the implementation of the College's Child Protection and Safeguarding Policy and Procedures from the DSL;
- Ensure that the DSL is part of the College's senior leadership team, and has sufficient time and resources at their disposal to carry out their duties effectively;
- Ensure that a DDSL is identified;
- Ensure that the DSL and DDSL receive the necessary training at least every two years – and keep updated on all new training aspects related to Safeguarding or Child Protection at least annually;
- Ensure that training in child protection is provided to all staff, including Lunch Time Supervisors, administrative staff and other ancillary staff, in accordance with the Local Safeguarding Children Board recommendations with at least annual updates;
- Ensure that arrangements are in place for the inclusion of child protection training on the College's procedures in an induction programme for all people working in the College, no matter for how long, nor the status of that individual;
- Ensure arrangements are in place to ensure safer recruitment procedures and appropriate checks are undertaken on all new staff and volunteers and to carry out a check of the College's Single Central Register on at least an annual basis;

- Be aware of how safeguarding and child protection issues are addressed through the curriculum and to take responsibility at Governor level to ensure that pupils are taught about safeguarding and given guidance on adjusting behaviour to reduce risks including the safe use of electronic devices and the internet, building resilience to protect themselves and their peers, and provided with information about who they should turn to for help within in the College;
- To provide information to the local authority about how the Board of Directors' duties in respect of safeguarding and child protection have been discharged if requested.

The Nominated Safeguarding Director will liaise with the Principal and the local authority regarding all confidential child protection issues involving allegations against staff.

Where there is an allegation of abuse against the Principal, the Nominated Safeguarding Director will take the lead in liaising with the local authority and/or other partner agencies including:

- - Notifying the designated officer of the local authority immediately before any action is taken;
 - Ensuring, with local authority support, that appropriate action is taken in accordance with agreed Local Safeguarding Children Board procedures;
 - Attending initial and subsequent strategy meetings as required if other agencies are involved;
 - Taking the lead in an investigation (when the Principal is unable to do so) under the College's internal employment procedures when the other agencies' involvement is at an end or as soon as it is confirmed that this may take place;
 - Taking the lead in reviewing the College's child protection and safeguarding policies and procedures with the Designated Safeguarding Lead, taking advice from the designated officer of

the local authority, and making the necessary changes;

- By sound use of all available data as indicated above, ensuring mechanisms are in place to enable staff, visitors and volunteers understand their responsibilities for safeguarding and child protection as outlined in KCSIE (2021).

- **Appendix 4: Additional external contacts**

| | |
|--|--|
| <p>Concerns about Students Bi-Borough Admissions and Access to Education: Children Missing Education, Child Employment and Elective Home Education:</p> | <p>Wendy Anthony Tel: 020 7745 6440 Email: wendy.anthony@rbkc.gov.uk</p> |
| <p>NSPCC Whistleblowing Advice Line</p> | <p>Address: Weston House, 42 Curtain Road London, EC2A 3NH Tel: 0800 028 0285 Email: help@nspcc.org.uk</p> |
| <p>Disclosure and Barring Service</p> | <p>Address: PO Box 181, Darlington, DL1 9FA Tel: 01325 953795 Email: dbsdispatch@dbs.gsi.gov.uk</p> |
| <p>Teaching Regulation Agency</p> | <p>Address: 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH Tel: 0207 593 5393 Email: misconduct.teacher@education.gov.uk</p> |
| <p>OFSTED Safeguarding Children</p> | <p>Tel: 0300 123 4666 (Monday to Friday from 8am to 6pm) Email: whistleblowing@ofsted.gov.uk</p> |
| <p>Independent Schools Inspectorate</p> | <p>Tel: 0207 6000100 Email: concerns@isi.net</p> |
| <p>Forced Marriage Unit</p> | <p>Tel: 020 7008 0151 Email: fmufco.gov.uk</p> |
| <p>Tri-Borough Multi-Agency Safeguarding Hub (MASH)</p> | <p>Esohoe Erhahon Education Lead, Tri-Borough MASH Telephone: 020 7641 5026 Email: eerhahon@westminster.gov.uk</p> |
| | |

| | |
|------------------------------------|---|
| Childline | 0800 1111 |
| NSPCC | Anne Longfield OBE Children's Commissioner Tel1: 0808 800 5000 Tel2: 0800 528 0731 Tel3: 0203 299 6900 Email: info.request@childrenscommissioner.gsi.gov.uk |
| College approved counsellor | Rebeca Robertson Email: Rebeca.Robertson@AshbourneCollege.co.uk Tel: 07946 381 024 |
| Sexual Assault Guidance | The Havens Tel: 020 3299 6900 Web: https://www.thehavens.org.uk/ |

Appendix 5: Further guidance

- - 157 Prevent Toolkit Children Act 1989
 - Advice to schools and colleges on gangs and youth violence –
<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>
 - Are you worried about online sexual abuse or the way someone has been communicating with you online? –
<https://www.ceop.police.uk/safety-centre/>
 - Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) Multi-agency statutory guidance on FGM (2016)
 - Child abuse linked to faith or belief: national action plan –
<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>
 - Children missing Education (2016)
 - Children's Plan 2007 Colleges
 - Contest (The National Counter-Terrorism Strategy)

- Counter-Terrorism and Security Act 2015
- Dealing with allegations of abuse against teachers and other staff – Department for Education 2012
- DfES Safeguarding Children in Education
- Domestic abuse: how to get help –
<https://www.gov.uk/guidance/domestic-abuse-how-to-get-help>
- Drugs: advice for schools –
<https://www.gov.uk/government/publications/drugs-advice-for-schools>
- Eating disorders – <https://www.beateatingdisorders.org.uk>
- Education Act 2011
- Employment 35/13-protected cautions and convictions further advice, AOC, July 2013
- Equality and Diversity Act 2010
- Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings (DCSF 2009)
- Independent Safeguarding Authority, 2009
- Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Keeping Children Safe in Education (KCSIE – 2021)
- London Child Protection Guidelines (Updated May 2018)
- NSPCC – Guidance on Child Protection Records
- Prevent Cloud Instructions and Guidelines
- Preventing Bullying –
<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>
- Revised Prevent duty guidance: for England and Wales (July 2015)
- Revised Prevent duty: Departmental advice for schools and childminders (June 2015)
- Safeguarding Children and Safer Recruitment in Education (DfES 2010)

- Safeguarding children in whom illness is fabricated or induced –
<https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>
- Safeguarding children from forced marriages
- Safeguarding Vulnerable Groups Act 2006
- Safer Practice, Safer Learning (NIACE 2007)
- Sefton – A coordinated response to self-harm in children and young people 2008
- Sefton LSCB – Multi-Agency Threshold Pathway to Provision Handbook 2015
- Self-harm –
https://www.surreycc.gov.uk/__data/assets/pdf_file/0019/14527/Recognising-and-managing-self-harm-and-suicidal-behaviour.pdf
- The mental health strategy for England –
<https://www.gov.uk/government/publications/the-mental-health-strategy-for-england>
- The Protection of Children in England – the Government Response to Lord Laming, 2009
- The UKCCIS (UK Council for Child Internet Safety) Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people (2017) will be followed.
- The use of social media for on-line radicalisation (July 2015)
- Vetting and Barring Scheme – Update.
- What to do if you're worried a child is being abused: advice for practitioners (2015)
- Working together to Safeguard Children (July 2018)
- [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#) – Government guidance
- [Disrespectnobody](#) is Home Office advice and includes resources on healthy relationships, including sexting and

pornography

- [Education for a connected world framework](#) from the UK Council for Internet Safety supports the development of the curriculum and is of particular relevance to RSHE education and Computing. It is designed, however, to be usable across the curriculum and beyond (covering early years through to age 18) and to be central to a whole school or college approach to safeguarding and online safety.
- [Teaching online safety in school](#) Dfe guidance outlining how schools can ensure their pupils understand how to stay safe and behave online as part of existing curriculum requirements
- [Thinkuknow](#) is the National Crime Agency/CEOPs education programme with age specific resources
- [UK Safer Internet Centre](#) developed guidance and resources that can help with the teaching of the online safety component of the Computing Curriculum.

| | |
|------------------------------|--|
| Authorised by | The Principal |
| Date | September 2021 |
| Effective date of the policy | September 2021 |
| Circulation | Teaching staff / all staff / parents / students on request |
| Review date | September 2022 |

Annex A: COVID-19 Response

Ashbourne has made substantial upgrades and undertaken a wide range of measures to ensure compliance with UK Government guidance and regulations and to minimise risk of spreading the virus. For further information please read the [COVID-19 Response Policy](#), which also sets out safeguarding measures for lessons conducted online.

Annex B: Online safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers the College to protect and educate the whole College community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

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; for example pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

Appendix A: Vulnerable students with an EHCP

Vulnerable students include those who have a social worker and young people up to the age of 25 with an Education, Health and Care Plan (EHCP).

Those who have a social worker include students who have a Child Protection Plan and those who are looked after by the Local Authority. A student may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

Those with an EHCP will be risk-assessed in consultation with the Local Authority and parents, to decide whether they need to continue to be offered a College place in order to meet their needs,

or whether they can safely have their needs met at home. This could include, if necessary, carers, therapists or clinicians visiting the home to provide any essential services. Many children and young people with EHCPs can safely remain at home.

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

Ashbourne will, where applicable, continue to work with and support student's social workers to help protect vulnerable children. This includes working with and supporting student's social workers and the local authority for RBKC. The lead person for this will be: Fran Burns.

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

Where parents are concerned about the risk of the child contracting COVID-19, Ashbourne or the social worker will talk through these anxieties with the parent/carer following the advice set out by Public Health England.

Ashbourne and social workers will agree, where applicable, with parents/carers whether children in need should be attending school and then follow up on any student that they were expecting to attend, who does not. They will also follow up with any parent or carer who has arranged care for their child(ren) who subsequently do not attend.