

South Quay College Safeguarding and Child Protection Policy

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1. Introduction and Scope of Policy

South Quay College (SQC) is committed in its duty of “safeguarding and promoting the welfare of children” (Education Act 2002, sec. 175), recognising that this is fundamental to every activity and interaction that occurs within the life of the college. The college’s safeguarding policies and practices ensure we are supporting our students and the wider college community by protecting them from harm, promoting their welfare and overcoming barriers to achievement. We provide an environment in which students, carers, staff and visitors feel safe, valued, listened to and supported.

1.1 Safeguarding Definition

This policy utilises the definition of safeguarding published in the government guidance https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811513/DRAFT_Keeping_children_safe_in_education_2019.pdf

[‘Working Together to Safeguard Children’](#) (2019) and [‘Keeping Children Safe in Education’](#) (2019), which defines safeguarding as:

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

Safeguarding practices apply to every member of the college community, but in recognition of the age range of our students, we identify our professional duty towards two relevant groups within the college:

- **children**
 - anyone under the age of 18.
- **adults at risk**
 - aged 18 years or over
 - has needs for care and support (whether or not the authority is meeting any of those needs),
 - is experiencing, or is at risk of, abuse or neglect, and
 - as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it

Put simply, **safeguarding involves protecting students from harm, and taking the necessary actions to promote their welfare.**

1.2 Equality and Diversity

Intrinsically related to our safeguarding duty, SQC and its staff are subject to the Equality Duty (Equality Act, 2010). The Equality Duty requires public bodies to have due regard to the need to:

- i. Eliminate discrimination and other conduct that is prohibited by the Act
- ii. Advance equality of opportunity between people who share a protected characteristic and people who do not share it
- iii. Foster good relations across all characteristics – between people who share a protected characteristic and people who do not share it.

The protected characteristics outlined within the act are:

- **Race** (*race, colour, ethnic/national origin, nationality – including citizenship*)
- **Sex** (male or female)
- **Age**
- **Disability** (*physical or mental condition and long-term/progressive illness i.e. HIV*)
- **Sexual Orientation** (*lesbian, gay, bi-sexual and heterosexual*)
- **Religion or belief** (*religion, religious or non-religious belief*)
- **Gender Reassignment** (*includes those who chose to live in the opposite gender assigned to them at birth, those in the process of gender reassignment and those who have undergone gender reassignment*)
- **Marriage or Civil Partnership** (*married or in a civil partnership*)
- **Pregnancy and Maternity** (*pregnant, on maternity leave or breastfeeding*)

Safeguarding practices and the wider conduct of staff must comply with the Equality duty.

2. Responsibilities and Expectations of Staff and Volunteers

The guidance *'Keeping Children Safe in Education' (2019)* makes clear that **everyone has responsibility for safeguarding students** at SQC. This requires all staff and volunteers to adopt a child-centred approach that considers, at all times, what is in the best interest of the student. Fulfilling the safeguarding responsibility involves all staff and volunteers:

- creating a safe environment for learning
- conducting themselves in a professional manner and maintaining appropriate boundaries (see section 5)
- ensuring students feel heard
- identifying concerns (including Early Help identification – see section 4.1)
- handling disclosures (see section 3.1)
- sharing information and reporting concerns (see section 3.2)
- taking prompt action, and
- developing resilience and the capacity to manage risks within our students

All staff and volunteers must read the SQC Safeguarding Booklet as part of their induction, and complete the required online training. The SQC Safeguarding Booklet makes clear that all staff and volunteers must read at least section one of *Keeping Children Safe in Education*, and those who have daily contact with pupils must also read Annex A.

2.1 The Role of the Designated Safeguarding Lead (DSL)¹

SQC appoints a senior member of staff to undertake the role of Designated Safeguarding Lead (DSL). The DSL takes lead responsibility for safeguarding and child protection, and supports all staff in fulfilling their safeguarding duty. The DSL has responsibility for ensuring there are policies and processes in place to:

- ensure staff, volunteers and governors are adequately trained to carry out their safeguarding and Prevent duty
- manage concerns that are reported within SQC
- manage referrals to external services, including local authority children's and adult services
- support staff who make external referrals
- liaise with key professionals and services in multi-agency working model
- ensure child protection files are securely stored and transferred when required

SQC appoints Deputy Designated Safeguarding Leads to support the DSL. The DSL can delegate certain activities to the Deputy DSL, whilst maintaining lead responsibility. Deputy DSL must receive appropriate DSL training.

Staff appointed as DSL and Deputy DSL are detailed in Appendix B – Key Contacts and Information, and can be found in Appendix A – Safeguarding Flowchart.

The DSL also ensures that key areas of risk management have been assessed, and appropriate staff are tasked with their oversight (see table below).

Risk Assessment	Staff responsible for risk management
Managing visitors and external speakers on site	Office and contracts team

¹ Further information on the Role of the Designated Safeguarding Lead can be found in Annex B of [Keeping Children Safe in Education](#).

Educational visits and enrichment activities	Key stage managers and staff leading the visit
Admitting or readmitting students whose behaviour may place other students or staff at risk	Principal, Key stage manager, key stage inclusion panel, relevant external services
Students with health needs and those who require healthcare plans	DSL, Pastoral Manager, Safeguarding Manager
Assessing students who self-harm, who may pose a risk to themselves or others	DSL, Pastoral Manager, Safeguarding Manager, relevant external services

2.2 The role of the Governing Body²

Section 175 of the Education Act (2002), and regulations under section 157 relating to safeguarding pupils in schools, place a duty on the boards of maintained schools and academy trusts to have arrangements in place to ensure that they:

- carry out their functions with a view to safeguarding and promoting the welfare of children; and
- have regard to the statutory guidance issued by the Secretary of State in considering what arrangements they need to make for the purpose of that section.

Furthermore, *Keeping Children Safe in Education* requires all boards to ensure their schools have effective safeguarding policies and procedures in place that take into account local risks, any statutory guidance issued by the Secretary of State, any LA guidance and locally agreed inter-agency procedures.

SQC's governing body appoints a safeguarding governor to take leadership responsibility for the colleges safeguarding arrangements, which includes the Prevent Duty. Key aspects of the safeguarding governor's role include:

- Understand the safeguarding requirements of the college (including relevant policies i.e. Safeguarding and Staff Behaviour/Code of Conduct)
- Ensure that there are effective systems in place to keep vulnerable children safe
- Check that the school is compliant with statutory guidance
- Check whether there is a consistency in safeguarding across the whole school
- Support the work of the Designated Safeguarding Lead
- Ensure suitable training arrangements are in place for governors and staff (including their safeguarding governor role, and the role of the DSL and deputy DSLs).
- Report back to the Governing Body about how effective safeguarding is

The details of the safeguarding governor can be found in Appendix B – Key Contacts and Information.

3. Reporting Concerns

As highlighted earlier in this document, all staff and volunteers have a responsibility to safeguard students. No single professional can have a full picture of a student's needs and circumstances, so if students and their families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Reporting concerns you may have about a student, either from a disclosure a student has made, or from your own observation, is a fundamental part of your safeguarding duty. Any staff member or volunteer who has a concern about a child's welfare should follow the referral processes outlined in this policy.

² Further information can be found in section 6.7 of the [Governance Handbook](#).

3.1 Dealing with disclosures

A student may choose to make a disclosure of concern, harm, abuse or neglect to any staff or volunteer within the college. The following guidelines offer helpful advice for responding to students who make a disclosure.

- **Keep calm and avoid reactions of shock.** Try to ensure your body language remains reassuring.
- **Listen carefully.** Never push for information or ask leading questions. If the student changes their mind about speaking to you, accept their decision and let them know you are always ready to listen.
- **Show acceptance of what you are being told,** even if the information seems unlikely. Do not express disbelief.
- **Never promise confidentiality.** Let them know that you have a professional responsibility to ensure they, and others, are kept safe, which can mean getting the right support. Reassure them you will only tell people you think will be able to help them, and you will tell them when you do that.
- **Assure them they are not to blame and it's not their fault.** They may have been bribed or threatened that they or others will be harmed if they tell anyone.
- **Don't investigate/validate what is being said.** It is not your responsibility to investigate or prove the information being given. Don't use leading questions or probe, but seek to draw the conversation to a satisfactory close as soon as appropriate.
- **Don't talk to the alleged abuser.** Your responsibility is to report the information in an accurate and timely manner through the processes outlined in section 3.2.
- **Explain what you will do next;** that you will report the concern to someone who will be able to help.
- **Report the disclosure accurately and promptly** (see section 3.2).

Helpful things to say

- "Thank you for telling me."
- "It's not your fault."
- "You've done the right thing."
- "I will help you and only tell other people who can help you like me."

Unhelpful things to say

- "What?!? Are you sure?"
- "I can't believe this?"
- "Why did you not tell anyone before?"
- "Why did they do that?"

3.2 Reporting process

Any staff who have a concern about a student must take prompt action, and report those concerns **immediately**. Staff should initially speak to the DSL or a Deputy DSL (using the contact information in Appendix B if necessary) to get advice on managing the concern. It is likely the DSL or Deputy DSL will then direct staff to record the concern via the **My Concern** reporting system, which can be accessed at <https://myconcern.education>. Staff are required to log in using their work email address and a password they have chosen in accordance with the My Concern guidance.

Once staff have logged in there are two available options to select; 'Report a Concern' or 'Update a Concern'. Select 'Report a Concern' to submit initial reports about a concern or risk. Select 'Update a Concern' if you want to update a concern **you** have previously submitted (you cannot update a concern reported by a colleague unless the DSL has given you access).



When reporting a concern, please ensure that:

- The staff member who has a concern or receives a disclosure is the person who completes a report (not a colleague or manager).
- Reports should be written in the first person (i.e. use “I”, “my”).
- Reports are factual and accurate. Record exactly what the student said (including any slang or terms they used), not your interpretations or assumptions. The reports you make can be used as evidence in court, so ensure they are comprehensive and accurate.
- The date, time, location and context of the disclosure are recorded. It can be helpful to make a note of the student’s presentation (appearance, body language, mannerisms etc.).
- Any original notes you or the student made at the time are passed on to the DSL in case they are required for subsequent investigations.

If the DSL is implicated in the concerns, follow the guidance in section 3.4 of this policy.

It is the expectation that all concerns will be reported via this process, however all staff need to be aware of the process for making referrals to local authority children’s services (see section 3.3 of this policy), as staff can refer concerns directly to the local authority in exceptional circumstances (i.e. no DSL or Deputy DSL is contactable). If staff are not happy with the decision or advice of the DSL, they should speak to the Principal or seek advice from the Multi Agency Safeguarding Hub (MASH) team (contact details in section 3.3).

3.3 Local authority Children’s Services and Adult Safeguarding contact information

Each local authority has local safeguarding partners (composed of at least Children’s Social Care, the police and health services) that publishes a threshold document³, specifying identified levels of need, and the services available to meet those needs. The threshold document should include:

- the process for the early help assessment and the type and level of early help services to be provided;
- the criteria, including the level of need, for when a case should be referred to local authority children’s social care for assessment and for statutory services under:
 - section 17 of the Children Act 1989 (children in need);
 - section 47 of the Children Act 1989 (reasonable cause to suspect children suffering or likely to suffer significant harm);
 - section 31 (care orders); and
 - section 20 (duty to accommodate a child) of the Children Act 1989.
- clear procedures and processes for cases relating to the sexual exploitation of children and young people.

³ The Tower Hamlets documentation can be found at <http://www.childrenandfamiliestrust.co.uk/wp-content/uploads/2010/09/TH-Multi-agency-Threshold-Guidance-FINAL-GDPR-changes.pdf>

Within this framework, staff are able to refer to Children’s Services or Adult Safeguarding services, ideally having discussed their concerns with the DSL. If for any reason the DSL has not been made aware of a referral, they should be informed as soon as possible.

Local authorities may provide advice over the phone (through their Multi-agency Safeguarding Hub (MASH)), but all will require a written referral. This may be through an electronic referral form that needs to be completed, or through an online portal.

The contact details for neighbouring local authorities are detailed below, but any children’s services contact information can be found at <https://www.gov.uk/report-child-abuse-to-local-council>.

	Children’s Services	Safeguarding Adults
Barking & Dagenham	020 8227 3811 EDT: 0208 594 8356 Email: childrenss@lbbd.gov.uk	020 8227 2915 EDT: 020 8594 8356 Email: intaketeam@lbbd.gov.uk
Greenwich	020 8921 3172 EDT: 020 8854 8888 Email: mash-referrals@royalgreenwich.gov.uk	020 8921 2304 EDT: 020 8854 8888 Email: aops.contact.officers@royalgreenwich.gov.uk
Hackney	020 8356 5500 EDT: 020 8356 2710 Email: fast@hackney.gov.uk	020 8356 5782 EDT: 020 8356 2300 Email: adultprotection@hackney.gov.uk
Haringey	020 8489 4470/4592/ 5652/ 5762 /4582 (Monday to Thursday 8.45am to 5pm; Friday 8.45am to 4.45pm) EDT: 020 8489 0000	020 8489 1400 EDT: 020 8489 0000 Inter-agency referral form found here
Islington	020 7527 7400 EDT: 020 7527 0992 - (5-9pm, 7 days a week) Email: csctreferrals@islington.gov.uk	020 7527 2299 EDT: 020 7226 0992 Email: access.service@islington.gov.uk
Lewisham	020 8314 6660 EDT: 020 8314 6000 Email: mashagency@lewisham.gov.uk	020 8314 7777 EDT: 020 8314 6000 Email: SCAIT@lewisham.gov.uk
Newham	020 3373 4600 EDT: 020 8430 2000	020 3373 0440 (24hr helpline) Safeguarding Adults form
Redbridge	020 8708 3885 EDT: 020 8708 5897 Email: cpat.referrals@redbridge.gov.uk	020 8708 7333 EDT: 020 8554 5000 adults.alert@redbridge.gov.uk
Southwark	020 7525 1921 EDT: 020 7525 5000 Email: mash@southwark.gov.uk	020 7525 1754 EDT: 020 7525 5000 safeguardingadultscoordinator@southwark.gov.uk
Tower Hamlets	020 7364 5601/5606 EDT: 020 7364 4079 (after 5pm and weekends) Email: mash@towerhamlets.gov.uk	020 7364 5005 EDT: 020 7364 4079 (after 5pm and weekends)

3.4 Allegations against a member of staff

If staff or volunteers have concerns about the safeguarding conduct of a member of staff, including allegations by a student of abuse, this should be reported to the DSL and Principal. If the concerns or

allegations relate to the DSL, this should be reported to the Principal only. If the concerns relate to the Principal, this should be reported to the chair of governors and/or the safeguarding governor (details in Appendix B). This applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

It should be noted that the allegations may relate to the personal or professional life of the member of staff or volunteer, and applies regardless of whether the alleged abuse took place in the college. Allegations against a teacher who is no longer teaching, and historical allegations of abuse, will be referred to the police.

The Principal (who may delegate to the DSL), or chair of governors/safeguarding governor, then assumes the role of case manager. Any allegation made against a member of staff or volunteer should be dealt with fairly, quickly and consistently, in a way that effectively balances the protection and welfare of the student, and supporting the person who is the subject of the allegation.

3.4.1 Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Immediately discuss the allegation with the Local Authority Designated Officer (LADO). This is to consider the nature, content and context of the allegation (i.e. establish practical details about the time, dates(s) and location of the alleged abuse and the names of potential witnesses). On no account should the case manager seek to interview the student(s), or the person(s) against whom the allegation has been made. The college must keep a written record of these details and this should be signed and dated by the case manager. If the LADO is unavailable, then the MASH team should be contacted directly.
- In consultation with the LADO agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. This may be undertaken within a Multi-Agency Allegation Against Staff and Volunteers (ASV) meeting. This will be convened by the LADO and should include a representative of the college.

(The case manager may, on occasion, consider it necessary to involve the police *before* consulting the LADO e.g. if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the LADO as soon as practicably possible after contacting the police).

- Where appropriate, carefully consider whether suspension of the individual from contact with students at the college is justified or whether alternative arrangements can be put in place.

Alternative arrangements could involve:

- Redeployment within the college so that the individual does not have direct contact with the child(ren) concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted

Advice will be sought from the LADO, police and/or children's social care services, as appropriate.

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (and the police or children's social care services, where

necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

- **If immediate suspension is considered necessary**, agree and record the rationale for this with the LADO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the LADO to initiate the appropriate action in college and/or liaise with the police and/or children's social care services as appropriate.
 - Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate.
 - Inform the parents or carers of the child(ren) involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
 - Parents or carers of the child/children involved should be informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
 - Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

If the college is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the governing body will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

3.4.2 Allegation Investigation Outcomes

The case manager, in consultation with the LADO, will decide whether the allegation is:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Further guidance about managing allegations against staff and visitors can be found in part four of *Keeping Children Safe in Education*, and local information relevant to Tower Hamlets, including courses of actions for

different investigation outcomes, can be found in [Procedures for Managing Allegations of Abuse Against Staff Working in Children's, School And Family Settings](#).

3.5 Whistleblowing⁴

Whistleblowing is the act of raising concerns about wrongdoing, illegal activity or negligence in the workplace. Actions that would give grounds for whistleblowing include:

- a criminal offence
- not obeying the law
- endangering of an individual's health and safety or welfare
- damage to the environment
- improper unauthorised use of public funds or other funds
- a miscarriage of justice has occurred, or is likely to occur
- maladministration, misconduct or malpractice
- actions that pose a risk of harm to children or adults at risk
- covering up of wrongdoing

Whistleblowing relates to concerns with a public interest, that is, the concern affects others (see the [Public Interest Disclosure Act 1998](#)). If staff have a personal grievance, this should be reported by the college's Complaints Policy and Procedures.

Should staff have a concern that falls within the remit of whistleblowing, they are encouraged to express this in order to maintain professional standards within the college and promote the welfare of the college community. They should be confident that these concerns are listened to and taken seriously by the college.

Staff may feel unsure about whistleblowing (perhaps due to concerns of reprisal, victimisation, harassment, loss of working relationship etc.), but they must recognise their responsibility to safeguard the college and its staff and students, and avoid becoming complicit through their inaction. The earlier a concern can be raised, the easier it should be to deal with it.

Whistleblowers are protected by law from victimisation, harassment, unfair treatment and unfair dismissal. If a whistleblower is mistreated by a colleague as a result of whistleblowing, the colleague will face disciplinary action. Confidentiality is assured at the point of making a protected disclosure and will be maintained during investigations and hearings, other than when there is a need for disclosure of identity due to cross examination of the staff member as a witness in any subsequent procedure. Confidentiality will be maintained as far as is possible within the whistleblowing process.

3.5.1 How to raise concerns/whistleblow

Concerns should initially be raised in writing to a line manager or relevant head of department. Staff should set out the background and history of the concern giving names, dates and places where possible, and the reason why they are particularly concerned about the situation. If the employee does not feel able to put their concerns in writing, they should arrange to meet with the Business Manager.

If the employees concern relates to their line manager, they should raise their concerns in writing to the Business Manager.

What response can be expected?

The action taken by SQC will take depends on the nature of the concern. The matters raised may:

- be investigated by the Head of department

⁴ Further information on whistleblowing can be found at <https://www.gov.uk/whistleblowing>.

- be investigated by the Business Manager, either in conjunction with other SQC employees or separately
- be investigated internally by an appropriately skilled and experienced individual, knowledgeable in the area concerned
- form the subject of an independent enquiry if required

In order to protect individuals, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations that fall within the scope of specific procedures (for example, **child protection** or allegations against a professional or **discrimination**) will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation.

Within ten working days of a concern being received the individual with whom the employee raised the matter will write to the employee:

- acknowledging the concern has been received
- indicating how it is proposed to deal with the matter
- giving an estimate of how long it will take to provide a final response
- telling the employee whether any initial enquiries have been made, and
- telling the employee whether further investigations will take place,
- and if not, the reason why.

The amount of contact between the individual(s) considering the issues and the employee who made the protected disclosure will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from the employee in a discreet manner. When any meeting is arranged, the staff member may be accompanied by a union or workplace representative. The meeting can be 'off site', if requested.

If an employee makes an allegation, but it is not confirmed by the investigation, no action will be taken against that employee. If, however, an employee makes malicious or vexatious allegations, disciplinary action may be taken against them. In determining whether an employee has acted maliciously and/or vexatious the investigator will consider whether the employee was motivated to make the allegation(s) simply out of a desire to pursue a personal vendetta or grudge.

This process is intended to provide staff with an avenue to raise concerns within SQC. We hope anyone invoking this procedure will be satisfied with the response given. If not, the employee should indicate this to the Principal (in the case of delivery based staff) or the Business Manager (in the case of support based staff). Should staff or volunteers feel unable to raise concerns within SQC, or feel concerns they have raised have not been addressed, they can contact the NSPCC whistleblowing helpline on 0800 028 0285 (08:00-20:00, Mon-Fri) or email help@nspcc.org.uk.

3.6 SEND students

We acknowledge that students with special educational needs and disabilities (SEND) can face additional safeguarding challenges. We are aware that additional barriers can exist when recognising abuse and neglect in this group of young people. This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration; students being more prone to peer group isolation than other children; students with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers.

All students at South Quay College have a One Plan that includes additional SEND concerns that need to be taken into account when assessing safeguarding concerns. Furthermore, those students with an Education, Health and Care Plan (EHCP) will have the information and recommendations contained within their plans taken into account when managing their safety and welfare, and managing any concerns and risks.

3.7 Looked After Children, previously Looked After Children and Care Leavers

A child who is looked after by a local authority, referred to as a looked-after child (LAC) as defined in section 22 of the Children Act 1989 means a child (0-18 years of age) who is subject to a care order (or an interim care order) or who is accommodated by the local authority. Students who are looked after by the local authority are required to have plans and provision in place for their educational achievement. This is coordinated by the virtual school, in partnership with SQC.

Responsibility for the coordination of support for looked after children (LAC) within SQC is held by the designated teacher for looked after children (details of who holds this position can be found in Appendix B). The designated teacher will oversee that all looked after students at SQC have a high quality Personal Education Plan (PEP) in place in line with statutory guidance, and SQC is present at relevant LAC review meetings. These responsibilities can be delegated to suitably trained staff.

LAC, previously LAC and care leavers can face additional challenges and vulnerabilities, which staff need to be aware of. Timely and effective inter-agency communication is essential for this group of students, particularly if they are missing from home or education.

3.8 Private Fostering Arrangements⁵

The *Replacement Children Act 1989 Guidance on Private Fostering* provides the following definition:

“A private fostering arrangement is essentially one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. Private foster carers may be from the extended family, such as a cousin or great aunt. However, a person who is a relative under the Children Act 1989 i.e. a grandparent, brother, sister, uncle or aunt (whether of the full or half blood or by marriage) or step-parent will not be a private foster carer. A private foster carer may be a friend of the family, the parent of a friend of the child, or someone previously unknown to the child’s family who is willing to privately foster a child. The period for which the child is cared for and accommodated by the private foster carer should be continuous, but that continuity is not broken by the occasional short break. Exemptions to this definition are set out in Schedule 8 to the Children Act 1989...The private foster carer becomes responsible for providing the day to day care of the child in a way which will promote and safeguard his welfare. Overarching responsibility for safeguarding and promoting the welfare of the privately fostered child remains with the parent or other person with parental responsibility. Local authorities do not formally approve or register private foster carers. However, it is the duty of local authorities to satisfy themselves that the welfare of children who are, or will be, privately fostered within their area is being, or will be, satisfactorily safeguarded and promoted. It is the local authority in whose area the privately fostered child resides which has legal duties in respect of that child.”

If a member of staff or volunteer at SQC becomes aware that a student may be in a private fostering arrangement, where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation

⁵ Further guidance on private fostering can be found in Annex E of [Keeping Children Safe in Education](#).
Karin Compton July 201913

by someone to whom they are not related in that person's home, they should raise this to the DSL. SQC will then notify the local authority of the circumstances, to enable the local authority to check that the arrangement is suitable and safe for the student.

Currently, SQC does not arrange any trips or learning experiences that amount to private fostering.

4. Identifying concerns and risks

SQC staff and volunteers need to be aware of the types of abuse and neglect so that they are able to identify students who may be in need of help or protection. They are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned, so that prompt action and support can be implemented. Knowing what to look for is vital to the early identification of abuse, neglect and safeguarding risks (outlined in section 4 of this policy, with further information available in Annex A of *Keeping Children Safe in Education*). If staff members are unsure about any concerns they have, they should speak to the DSL or Deputy DSLs. Further information can also be found in the guidance [What to do if you're worried a child is being abused](#).

4.1 Early Help⁶

Early help means providing support as soon as a problem emerges, and all staff and volunteers are key in identifying concerns and risks at an early stage. These concerns should be reported through the normal reporting processes (outlined in section 3.2) so that an appropriate plan of action can be agreed. This may involve sharing information and liaising with other professionals and services, completing an Early Help Assessment (EHA), and in some cases, acting as the lead professional to coordinate these actions.

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

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

Staff can contact the Tower Hamlets Early Help Hub for advice and support (contact details in Appendix B).

4.2 Definitions and signs of abuse and neglect⁷

Sexual Abuse	Emotional Abuse
Definition: Forcing or enticing a child or young person to take part in sexual activities. This may involve	Definition: Actual or likely severe adverse effect on the emotional and behavioural development of a child

⁶ Further information on Early Help is available in Chapter 1 of [Working Together to Safeguard Children](#).

⁷ Comprehensive information on abuse and neglect is available from the [NSPCC](#).

<p>physical contact (penetrative and non-penetrative) and non-contact e.g. watching or producing sexual images, encouraging sexualised behaviour, grooming and exploitation.</p> <p>Signs/Indicators</p> <ul style="list-style-type: none"> • Any allegations made by a child concerning sexual abuse • A child with excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour, or who engages in age-inappropriate sexual play • Sexual activity through words, play or drawing • Repeated urinary infections or unexplained abdominal, ‘tummy’ pains • Child who is sexually proactive or seductive with adult • Inappropriate relationships with peers and or adults • Severe sleep disturbances with fears, phobias, vivid dreams or nightmares • Eating disorders • Evidence of grooming by individuals or groups of adult 	<p>caused by persistent or severe emotional ill treatment or rejection. All abuse involves some emotional ill-treatment. This category is used where it is the main or sole use of abuse.</p> <p>Signs/Indicators</p> <ul style="list-style-type: none"> • Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy. Also depression, aggression and extreme anxiety • Highly aggressive or cool to others • Nervousness, frozen watchfulness, persistent tiredness • Obsessions or phobias • Sleep or speech disorders • Negative statements about self • Extreme shyness or passivity • Sudden under-achievement or lack of concentration • Inappropriate relationships with peers or adults • Attention seeking behaviour • Running away, stealing, and lying
<p>Physical Abuse</p> <p>Definition: Actual or likely physical injury to a child, or failure to prevent physical injury (or suffering) to a child, including deliberate poisoning, suffocation and fabricated or induced illness.</p> <p>Signs/Indicators</p> <ul style="list-style-type: none"> • Any injuries not consistent with the explanation given for them • Injuries which have to receive medical attention • Injuries which have not received medical attention (but should have) • Injuries that occur to places on the body not normally exposed to accidents • Reluctance to change for, or participate in, games or swimming • Bruises, bites, burn, fractures etc. which do not have an accidental explanation • Child gives inconsistent accounts for the causes of injuries 	<p>Neglect</p> <p>Definition: The persistent or severe neglect of a child or the failure to protect a child from exposure to any kind of danger, including cold and starvation or extreme failure to carry out important aspects of care, resulting in the significant impairment of the child’s health or development, including non-organic failure to thrive.</p> <p>Signs/Indicators</p> <ul style="list-style-type: none"> • Dirty skin, body smells, unwashed, uncombed hair and untreated lice • Under nourishment • Clothing that is dirty, too big or small, or inappropriate for weather conditions • Frequently left unsupervised or alone • Frequent diarrhoea • Frequent tiredness • Untreated illnesses, infected cuts or physical complaints which the carer does not respond to • Frequently hungry • Stealing or gorging food, overeating junk food

4.3 Preventing Extremism and Radicalisation⁸

Under section 26 of the Counter-Terrorism and Security Act 2015, SQC recognises its duty to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. Similar to our responsibility to safeguard students against other forms of harm, the prevent duty highlights the need to safeguard students from being drawn into a process by which they come to support

⁸ Further information can be in [The Prevent Duty – Departmental advice for schools and childcare providers](#).
Karin Compton July 201915

extremism and terrorism, including the risk of travelling to conflict zones; a process known as radicalisation. This involves being alert to students who may be vulnerable to this process, whilst also developing their resilience to manage these, and other, risks.

The process by which someone is radicalised can be very varied, making identification challenging. All staff and volunteers complete the [e-learning training](#) from the Home Office as part of their induction, to equip them with the foundational knowledge they require. Further training and resources are then available to support professional development, and the service offered to students. Staff and volunteers need to use their professional judgement when identifying and risk assessing concerns about radicalisation, but some signs to be alert to include:

- Students becoming increasingly argumentative and unwilling to listen to other's point of view. They may exhibit prejudice-based language or behaviour (e.g. based on race, religion, gender or sexuality).
- They may feel persecuted or wronged, and may develop an 'us and them' narrative.
- Susceptibility to conspiracy theories and unsubstantiated new stories/digital content.
- Out of character changes in dress, behaviour and peer relationships.
- Excessive time spent online, secretive about their online activity, and/or may have multiple profiles.
- Glorifying violence
- Evidence of possessing illegal or extremist literature
- Showing sympathy for extremist causes
- Associating with known extremist individuals or groups

If staff have any concerns regarding extremism and radicalisation, they should be reported through the usual reporting processes outlined in section 3.2. The DSL will then agree an appropriate course of action, which may involve intervention from SQC staff, work with the student's carer(s), liaison with the local Prevent coordinator, and/or a referral to the borough Channel panel or the police.

The Prevent duty is not intended to avoid or demonise difficult topics related to extremism. In fact, schools and colleges are recognised as important spaces in which these topics can be discussed. SQC recognises the responsibility it has to develop our student's resilience and sense of citizenship through our curriculum. An important part of this is a thorough exploration and promotion of the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs, as part of our students spiritual, moral, social and cultural development. In addition, the skills of critical thinking and digital resilience are explored in the curriculum, to highlight the risks that have been identified with digital mediums and content. Information and resources to support staff, volunteers and carers in protecting young people can be found at educateagainsthate.com. Further information on SQC's management of the Prevent duty can be found in the Preventing Extremism and Radicalisation policy.

4.4 Child Sexual Exploitation (CSE)⁹

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Services and professionals have become increasingly aware of the prevalence and harm of CSE, and therefore all staff are asked to be vigilant to its risks and potential indicators. Potential indicators of CSE include:

- Acquisition of money, clothes, mobile phones etc without plausible explanation;
- Gang-association and/or isolation from peers/social networks

⁹ Further information can be found in the [Child Sexual Exploitation guidance](#).

- Exclusion or unexplained absences from school, college or work
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/phone calls
- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age/sexually transmitted infections
- Evidence of/suspicious of physical or sexual assault
- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional well-being

In addition to identifying signs and symptoms of CSE, it is also helpful for staff to have an awareness of vulnerabilities that may make a young person more at risk of CSE. It must be remembered that not all children with these indicators will be exploited, and CSE can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse
- Lack of a safe/stable home environment, now or in the past (e.g. domestic violence or parental substance misuse, mental health issues or criminality, unstable accommodation)
- Recent bereavement or loss
- Social isolation or social difficulties
- Absence of a safe environment to explore sexuality
- Economic vulnerability
- Homelessness or insecure accommodation status
- Connections with other children and young people who are being sexually exploited
- Family members or other connections involved in adult sex work
- Having a physical or learning disability
- Being in care (particularly those in residential care and those with interrupted care histories)
- Sexual identity

If staff or volunteers have any concerns regarding CSE they should be reported through the usual reporting processes outlined in section 3.2. Staff may then be directed to submit a referral to the local authority MASH team.

4.5 Children missing from education¹⁰

A student missing from education is a potential indicator of abuse or neglect and such students are at risk of being victims of harm. SQC recognises that if a student is not attending education they are at greater risk of harmful concerns i.e. CSE, radicalisation and extremism (including travelling to conflict zones), criminal exploitation, trafficking, and being NEET (not in education, employment or training).

Effective attendance and registration policies and procedures are an important part of our safeguarding practices (see Attendance policy). These policies and procedures ensure:

- Students are registered within every session, and any non-attendance reported to carer(s).
- Staff are aware of the risks posed to students not being in education (see above).
- Poor or irregular attendance will be managed with effective liaison between staff, students, carers, and suitable partner agencies and services (e.g. Behaviour and Attendance Support Service, Outreach service, Early Help Transition Service, Parental Engagement Team, Children's Social Care).

¹⁰ Further information can be found in the [Children Missing Education](#) guidance.

- We inform the local authority when we plan to take students off-roll when they:
 - leave school to be home educated
 - move away from the school's location
 - remain medically unfit beyond compulsory school age
 - are in custody for four months or more (and will not return to school afterwards)
 - are permanently excluded
- We record the name of a student's new school and their start date when they leave SQC.

4.6 Female Genital Mutilation (FGM)¹¹

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. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers (along with regulated health and social care professionals) to report to the police where they discover, either through disclosure by the victim or visual evidence, that FGM appears to have been carried out on a girl under 18.

Staff and volunteers should be vigilant to the vulnerabilities and potential warning sign that FGM may occur. These include:

- students planning a long holiday abroad, or going 'home' to visit family
- a relative or cutter visiting from abroad, or talk of a female elder visiting from abroad
- a special occasion/ceremony/procedure to 'become a woman' or get ready for marriage
- a female relative being cut – a sister, cousin, or an older female relative such as a mother or aunt
- low integration in to UK society

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing, and may even look uncomfortable
- spending longer than normal in the bathroom or toilet (due to difficulties urinating)
- spending long periods of time away from a classroom during the day with bladder or menstrual problems
- frequent urinary, menstrual or stomach problems
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations
- confiding in a professional without being explicit about the problem due to embarrassment or fear
- talking about pain or discomfort between her legs

If any staff or volunteers discover that a student under the age of 18 has undergone FGM, they should report it through the SQC safeguarding processes, but teachers should understand that they will be supported to report the case to the police in line with the duty mentioned previously. The duty does not apply in relation to at risk or suspected cases or in cases where the woman is 18 or over. In these cases, staff should follow SQC safeguarding processes.

4.7 So-called 'honour-based' violence (HBV)

So-called 'honour-based' violence (HBV) is a term used to describe crimes committed against a woman or a girl (or sometimes men) who the family or the community feels has not followed what they believe is acceptable behaviour and has brought dishonour or shame to the family. These crimes may include FGM, forced marriage, practices such as breast ironing, abduction, physical and sexual assault, or in extreme cases, even murder.

¹¹ Further information can be found in [Multi-agency statutory guidance on female genital mutilation](#).
Karin Compton July 201918

Some common behaviours that families and communities may deem 'dishonourable' include:

- defying their parents
- talking to a male who is not related to the family
- seeking a divorce or seeking residence of the children after divorce
- refusing to marry a man chosen by the family (rejecting a forced marriage)
- sexual relationships or pregnancy before or outside of marriage (including kissing or intimacy in public)
- becoming 'western' (wearing make-up or clothes deemed inappropriate, having male friends or boyfriends from another faith etc.)
- gossip (rumours can damage the 'honour' of a family)
- using drugs or drinking alcohol
- being sexually assaulted or raped
- being LGBT

All forms of so-called HBV are abuse (regardless of the motivation) and must be reported via the SQC safeguarding processes. Staff and volunteers need to be alert to the possibility of a student being at risk of HBV, or already having suffered HBV.

4.8 Peer on peer abuse, sexual harassment and sexual violence¹²

SQC recognises that risks posed to students may come from their peers, both in and outside of SQC. This can include, but is not limited to, bullying (including cyberbullying), sexual harassment and sexual violence, physical assault, sexting (see section 4.9) and exploitation/grooming (both CSE and criminal exploitation). All incidents of peer on peer abuse should be recognised for the harmful actions they are, and never tolerated or dismissed as "banter", "just having a laugh" or "part of growing up". Neither should these incidents be seen as gendered norms, e.g. girls being sexually touched/assaulted or shamed on social media, or boys being subject to initiation/hazing type violence or sexual activity.

The risk of peer on peer abuse is minimised by having behavioural expectations made clear through displays in every classroom, included as part of every student's induction, requiring students to sign a 'Student Agreement', developing positive peer relationships through classroom activities and enrichment experiences, a robust SRE programme and wider PSHE curriculum, and overcoming barriers through the Active Citizenship and Enterprise (ACE) programme. Furthermore, staff know to be alert to early warning signs of animosity and tension between students, and will seek to reconcile any grievances through a restorative justice process. This may involve the involvement of carer(s) and any appropriate professionals working with the student/their family.

Challenging behaviour is dealt with through the processes outlined in the Behaviour policy and Anti-bullying and Harassment policy, but there may be occasions where more serious incidents require handling in a peer on peer abuse framework. Such occasions may involve elements of:

- a power imbalance; older or more confident students targeting more vulnerable students
- an incident being of a serious nature, possibly including a criminal offence
- raising risk factors for other students in the school
- indicating that other students may have been affected by this student/incident
- indications that young people outside the school may be affected by this student

4.8.1 What is sexual harassment and sexual violence?

Sexual harassment and sexual violence exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are **never** acceptable.

¹² Further information can be found in the [Sexual violence and sexual harassment between children in schools and colleges](#) guidance.

Sexual harassment is described as ‘unwanted conduct of a sexual nature’ that can occur online and offline. Sexual harassment in this policy is referenced in the context of child on child sexual harassment. 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 (but not is limited to):

- 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
- 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
 - sexual exploitation, coercion and threats

Sexual violence is classified under the Sexual Offences Act 2003 as:

- **Rape** – A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration** – A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual Assault** – A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Sexual harassment and sexual violence can occur between two children of any age and sex. Staff should be aware that some groups are potentially more at risk i.e. evidence shows that girls, students with SEND, and LGBT students (including those who are perceived to be by their peers, even if they don’t identify as such). It can occur through a group of children sexually harassing or sexually assaulting a single child or group of children.

4.8.2 Responding to reports of sexual violence and sexual harassment

Reports of sexual harassment and sexual violence may well be complex. Each incident will need to be managed on a case-by-case basis, but the following points, and further information from the [Sexual violence and sexual harassment between children in schools and colleges](#) guidance, provides a framework to be adapted in any occasion.

- Anyone reporting sexual harassment or sexual violence should be reassured they are being taken seriously, they have done the right thing, and any victims will be supported and kept safe
- Follow the guidelines in sections 3.1 and 3.2 of this policy re. dealing with, and reporting, disclosures
- Consider what support is necessary for the victim, the alleged perpetrator(s), and other children and staff. This could involve Children and Young People’s Independent Sexual Violence Advisors (ChISVAs) (contact details available through [Rape Crisis](#) and [The Survivor’s Trust](#)), [the Havens](#), the police, Children’s Social Care and the [Internet Watch Foundation](#) (to potentially remove illegal images). These considerations should include:
 - the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much

- control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour
- the ages of the students involved
- the developmental stages of the students involved
- any power imbalance between the students. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- is the alleged incident is a one-off or a sustained pattern of abuse?
- are there ongoing risks to the victim, other children, adult students or school or college staff?
- other related issues and wider context.
- If the victim does not want the college to tell anyone about it, the DSL should consider the following:
 - parents or carers should normally be informed (unless this would put the victim at greater risk).
 - the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to children's social care; and
 - rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police.

There are no easy or definitive answers when a victim requests not to tell anyone. Ultimately, the DSL will have to balance the victim's wishes against their duty to protect the victim and other children (and should seek advice from the NSPCC professionals helpline (0808 800 5000) if helpful).

- The college should do all they reasonably can to protect the anonymity of any students involved. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the students involved.
- An immediate risk and needs assessment should be completed, and consider:
 - the victim, especially their protection and support
 - the alleged perpetrator; and
 - all the other students (and, if appropriate, adult students and staff) at the college, especially any actions that are appropriate to protect them
- Possible options for courses of action include:
 - **Manage internally** – if the students are not in need of early help or statutory intervention the incident can be managed through internal behaviour management and safeguarding processes, ensuring all concerns, decisions and rationale are clearly recorded.
 - **Early help** – Providing the right early help is an effective means of promoting the welfare of students, and can address low level behaviours, preventing them from escalating. This may involve referrals to local third sector organisations or the school counsellor. All concerns, decisions and rationale are clearly recorded.
 - **Referrals to children's social care** - Where a child has been harmed, is at risk of harm, or is in immediate danger, a referral will be made to children's social care. Generally at this stage the parent/carer will be informed, unless doing so puts the student at additional risk, and this decision can be made in conjunction with children's social care. Close work with any allocated social workers will be important in providing the right level of support to students.
 - **Reporting to the police** – This can be done through our Safer Schools Officer (contact information in Appendix B), by calling 101, or 999 in an immediate emergency. Generally at this stage the parent/carer will be informed, unless doing so puts the student at additional risk, in which case the student will require clearly identified support in the decisions they are making. The college should, in conjunction with the police, agree what information can be given to staff and others.

An ongoing review of student's needs, and actions undertaken will help ensure the right support is being offered to all involved. Robust record keeping is essential in managing any incidents of this nature.

The Voyeurism (Offences) Act 2019 which criminalise the act of 'up skirting'. The [Criminal Prosecution Service \(CPS\)](#) defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders."

4.9 Online safety

New technologies, digital mediums and digital content provide many benefits and opportunities for learning, but also pose opportunities for risks. These risks can be summarised in to:

- **Content**
 - exposure to inappropriate content, including online pornography, extremist material, substance abuse
 - lifestyle websites promoting harmful behaviours (e.g. pro-anorexia)
 - hate content
 - content validation: how to check authenticity and accuracy of online content
- **Contact**
 - grooming (sexual exploitation, radicalisation etc.)
 - online bullying in all forms
 - social and commercial identity theft, including passwords
 - security breach of the ICT infrastructure
- **Conduct**
 - aggressive, hateful behaviour and cyber bullying
 - sexting (sending and receiving of personally intimate images) also referred to as SGII (self-generated indecent images)
 - revenge porn (the sharing of private, sexual material of another person without their consent with the purpose of causing embarrassment or distress)
 - privacy issues, including disclosure of personal information
 - digital footprint and online reputation
 - health and well-being (amount of time spent online)
 - copyright (little care or consideration for intellectual property and ownership – such as music and film)

Incidents of sharing inappropriate images (sexting) can have serious and far-reaching effects on students and the wider college community. SQC utilises the guidance [Sexting in schools and colleges, responding to incidents, and safeguarding young people](#) in avoiding these incidents, and managing them should they occur. The guidance adopts the term 'Youth produced sexual imagery' as this is clearer than sexting. It highlights the material being discussed in this context:

- Is produced by, shared by, or in possession of someone under 18 (either of themselves or another person under 18).
- Is sexual in nature i.e. if imagery contains a naked young person, a topless girl, and/or displays genitals or sex acts, including masturbation. It may also include overtly sexual images of young people in their underwear.
- Comprises both still images and videos.

The Protection of Children Act 1978 as amended in the Sexual Offences Act 2003 makes it an offense to possess, distribute, show or make indecent images of children (which is anyone under the age of 18). This law was designed to protect children from adults, however does mean under 18s who take, share or possess

images of themselves or peers are breaking the law. Within this context the National Police Chiefs Council have recommended that incidents of this nature are primarily treated as a safeguarding issue to avoid unhelpful criminalisation of children, and have produced [operational advice](#) for law enforcement to support this.

SQC takes the following steps when handling incidents of youth produced sexual imagery:

- 1. Reporting** - All concerns or disclosures need to be reported to the DSL using the safeguarding processes. Ensure the DSL is aware the concern has been raised by telephoning or speaking to them in person.
- 2. Initial review meeting** - The DSL will conduct an initial review meeting with appropriate staff. This meeting considers:
 - Whether there is an immediate risk to a young person or young people
 - If a referral should be made to the police and/or children's social care*
 - If it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery should not be viewed
 - What further information is required to decide on the best response
 - Whether the imagery has been shared widely and via what services and/or platforms. (This may be unknown.)
 - Whether immediate action should be taken to delete or remove images from devices or online services
 - Any relevant facts about the young people involved which would influence risk assessments
 - If there is a need to contact another school, college, setting or individual
 - Whether to contact carer(s) of the pupils involved - in most cases carer(s) should be involved

** An immediate referral to police and/or children's social care will be made at this initial stage if:*

- *the incident involves an adult*
- *there is 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 educational needs)*
- *what we know about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent*
- *the imagery involves sexual acts and any child in the imagery is under 13*
- *we have reason to believe a student is at immediate risk of harm owing to the sharing of the imagery e.g. they are presenting as suicidal or self-harming.*

- 3. Interviews and assessments** - The DSL (and other delegated staff) will follow agreed actions from the initial meeting, including interviewing the students involved, to establish the facts and assess the risks. The following areas will be considered:
 - Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
 - Who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the pupil in the imagery?
 - Are there any adults involved in the sharing of imagery?
 - What is the impact on the students involved?
 - Do the students involved have additional vulnerabilities?
 - Does the young person understand consent?
 - Has the young person taken part in this kind of activity before?
- 4. Informing carer(s)** - Carer(s) will be informed at the earliest opportunity, unless to do so puts the student at risk of harm. Any decision not to inform the carer(s) would generally be made in conjunction with other services such as children's social care and/or the police, who would take the

lead in deciding when the carer(s) should be informed. Staff may work with the student involved to decide on the best approach for informing carer(s).

- 5. Handling devices and imagery** - The 2011 Education Act updated schools powers to confiscate items, including electronic devices. It permits the searching for, and of, devices where there are concerns such devices may contain inappropriate content, by staff authorised by the Principal¹³. Authorised staff may examine data or files, and delete these where there is good reason to do so (parental consent is not required). However, where possible adults should **not** view youth produced sexual imagery. Staff should seek to ascertain the content of such imagery through conversations with the student, ascertain who is involved in the incident, and find out to what extent the image has been shared. Staff should encourage students to delete imagery and confirm to them that this has happened.

The decision to view imagery should be based on the professional judgement of the DSL. If a decision is made to view imagery, the DSL would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- is unavoidable because a pupil has presented an image directly to a staff member or the imagery has been found on a school device or network
- will not cause significant distress or harm to the pupil

If it is necessary to view the imagery then the DSL should:

- Never copy, print or share the imagery; this is illegal.
- Discuss the decision with the Principal.
- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Principal.
- Ensure viewing takes place with another member of staff present in the room, ideally the Principal or a member of the senior leadership team. This staff member does not need to view the images.
- Wherever possible ensure viewing takes place on college premises, in as private a space as possible.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery.
- Record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions

If the DSL finds material which concerns them and they reasonably suspect the material has been or could be used to cause harm or commit an offence, they can decide whether they should delete the material or retain it as evidence of a criminal offence or a breach of college discipline. If the DSL decides that other agencies do not need to be involved, then imagery should be deleted from devices and online services to limit any further sharing of the imagery.

- 6. Recording incidents** - All incidents at SQC relating to youth produced sexual imagery need to be recorded, including the decisions that were made, and the reasons for making them. This includes incidents that have been referred to external agencies and those that have not. Where we do not refer incidents out to police or children's social care, SQC should record the reason for doing so and ensure that this is signed off by the Principal.

¹³ Further information can be found in

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/554415/searching_screening_confiscation_advice_Sept_2016.pdf.

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SQC is committed to educating its students to the risks and considerations of online activity, and particularly the legal and emotional consequences of involvement with youth produced sexual imagery.

4.10 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation.

4.11 Children and the court system

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

They 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. This may be useful for some parents and carers.

4.12 Children with family members 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.

4.13 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: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential
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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 Mechanism¹² 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.

4.14 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

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 affecting young people can also occur within their personal relationships, as well as in the context of their home life.

5. Staff conduct and professionalism

Staff conduct is instrumental in creating a safe and secure learning environment for students, and putting in to practice our safeguarding duty and principles. A consistent, caring and professional approach from staff supports the safety and wellbeing of our students, and is of the highest importance in light of the vulnerabilities and complexities experienced by our students.

All staff must read and sign the Professional Standards at City Gateway College, and adhere to them throughout their professional conduct. The professional standards outline the required conduct of staff across the areas of: Duty of care, Exercise of Professional Judgement, Power and Positions of Trust, Confidentiality, Propriety and Behaviour, Dress and Appearance, Gifts, Infatuations, Personal Living Space, Communications with Students (including the use of technology), Social Contact, Social Networking Sites and Online Gaming, Physical Contact, Physical Education and other activities which require physical contact, Showers and Changing, Students in Distress, Behaviour Management, Care, Control & Physical Intervention, Sexual Contact with Students, One to One Situations, Transporting Children, Extra-curricular activities, First Aid and Administration of Medication, Intimate Care, Curriculum, Photography, Videos and other Creative Arts, Internet Use, Whistleblowing, and Sharing Concerns & Recording Incidents.

Staff conduct and professionalism allows for secure and supportive relationships to be built with students within a protective and respectful framework. Failure to adhere to the Professional Standards can have serious and damaging consequences for staff, visitors and students and is not tolerated within SQC.

6. Incident Management

As part of SQC's commitment to providing a safe learning environment for staff and students, our Behaviour Policy outlines how positive behaviour is encouraged within the college, and challenging behaviour is managed within a robust framework.

There may be occasions when larger scale incidents occur, and the effective management and support of all staff helps ensure these are dealt with effectively and quickly, to minimise the disruption and risk posed to others. All staff and volunteers need to be familiar with our incident management processes, to promote the safety and wellbeing of the SQC community and our neighbours, which can be found in Appendix 1 of the SQC Behaviour Policy. This outlines that the Duty Lead (usually the Key Stage Manager or Pastoral Lead) will take responsibility for managing an incident and its follow up, so staff should follow their directions in the event of an incident.

Should a critical incident occur (e.g. malicious attack on the college, large scale loss of amenities, terrorist incident in the local area), the senior leadership team will follow the protocols contained in the SQC Critical Incidents Plan.

7. Offsite Visits and Residentials

SQC's safeguarding duty is not limited to school sites, but explicitly applies while students are in our care. This includes offsite visits, volunteering opportunities, residentials and any occasion where staff may be offsite with a student (e.g. a 1:1 session or de-escalation action).

In order to effectively safeguard our students, staff must adhere to the following guidelines:

- Avoid going offsite with a student on your own. There should always be at least two members of staff, and sufficient numbers to effectively manage the size of the group.
- If, on rare occasions, you are offsite on your own, ensure your manager is aware of your location and the reasons why you are offsite with a student. You must be contactable by phone, ensure your manager has the number, and return to site as soon as possible.
- **All** planned offsite visits and residentials must have the following in place:
 - Written consent from parents/carers
 - Emergency contact information for each student
 - A completed risk assessment
 - Written medical information and health care plans for relevant students
 - A first aid kit and any required medication
 - A qualified first aider
 - Dietary information for students
 - Any required food and drink, and the means to safely transport it
- Ensure carer(s) are aware when their child will be offsite, and where they will be.

Comprehensive information on managing off site visits and residentials can be found in the SQC Day Trips and Residential Policy.

8. Confidentiality and Information Sharing¹⁴

SQC recognises that it has legal and ethical obligations of confidentiality when it comes to the personal information of staff, volunteers, students, and their families. All these groups must be confident that SQC gathers, manages, stores, and shares their information responsibly and appropriately.¹⁵

¹⁴ Further information and guidance can be in [Information Sharing: Advice for practitioners](#).

¹⁵ Comprehensive information can be found in SQC's [Confidentiality Policy](#).

Students can expect to receive a confidential service at City Gateway, which means information they give us will not be shared unnecessarily, and only with those where there is sufficient reason to share it. All staff and volunteers should make clear in their introductions with students the trustworthiness of their professional conduct, but also the limitations of their confidentiality. Students must know that staff and volunteers have a professional responsibility to pass on information to suitable staff to support students welfare and safety, and if they have any concerns that the student, or someone else, may be at risk of harm. Staff should let students know when they need to do that, so that the student does not feel misled or disempowered.

Information sharing is a fundamental element of safeguarding children, young people and adults at risk, and poor information sharing has been repeatedly highlighted as an issue in serious case reviews following the death of, or serious injury to, a child. SQC follows the information sharing general principles to ensure sharing of information is:

- **Necessary and proportionate** - When taking decisions about what information to share, you should consider how much information you need to release. The Data Protection Act 1998 requires you to consider the impact of disclosing information on the information subject and any third parties. Any information shared must be proportionate to the need and level of risk.
- **Relevant** - Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make sound decisions.
- **Adequate** - Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.
- **Accurate** - Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.
- **Timely** - Information should be shared in a timely fashion to reduce the risk of harm. Timeliness is key in emergency situations and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore harm to a child. Practitioners should ensure that sufficient information is shared, as well as consider the urgency with which to share it.
- **Secure** - Wherever possible, information should be shared in an appropriate, secure way. Practitioners must always follow their organisation's policy on security for handling personal information.
- **Record** - Information sharing decisions should be recorded whether or not the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom, in line with organisational procedures. If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester. In line with each organisation's own retention policy, the information should not be kept any longer than is necessary. In some circumstances this may be indefinitely, but if this is the case there should be a review process.

Within this context we communicate to students the remit of confidentiality and information sharing through our verbal interactions and support, our student paperwork and agreement, and displays within our classrooms and around the site.

9. Safer Recruitment

SQC recognises it's responsibility to ensure that staff, volunteers and other adults on site do not pose a risk to students, and all necessary safety and suitability checks have been carried out. Safer recruitment is vital in guaranteeing the suitability of adults that come in to contact with students in order to ensure student safety. Our safer recruitment processes are detailed within the SQC Safer Recruitment policy.

By way of an overview, SQC ensures it accurately advertises any available roles, and makes clear the expectations of the checks involved. These checks include:

- an identity check
- an enhanced DBS check/certificate
- a barred list check
- a check of professional qualifications
- a check to establish the person's right to work in the United Kingdom
- further checks on people who have lived or worked outside the UK
- a prohibition from teaching check (where relevant to the role)
- a section 128 check (where relevant to the role and responsibilities)

Alongside these checks, SQC ensures that at least one member of an interview panel has received safer recruitment training, and all appointments are subject to two satisfactory references.

These checks are required for staff (including temporary staff, agency staff and trainee teachers) and volunteers who will be undertaking regulated activity¹⁶. Someone will be considered to be engaging in regulated activity if, as a result of their work, they:

- will be responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- will carry out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- engage in intimate or personal care or overnight activity, even if this happens only once.

Due to the high likelihood of staff and volunteers undertaking regulated activity, they will be required to undertake an enhanced DBS check and barred list check. Contractors who are working on site will be subject to an enhanced DBS check, but not a barred list check.

Visitors to the site will need to adhere to the processes set out in the Visitors Policy, which includes a requirement to sign in at the main reception where they will be given information relating to the conduct requirements around SQC, and information on our safeguarding processes. Visitors are required to wear a visitors lanyard, and will be supervised by staff at all times while they are on site.

10. Staff Training

South Quay College are committed to providing all staff Safeguarding and Child Protection Training every half term.

South Quay College ensure that staff are trained to the following levels

Advanced Safeguarding Training (Level 3)

DSL

Deputy DSL

All members of SLT

Student Journey Leads

Safeguarding Training (Level 2)

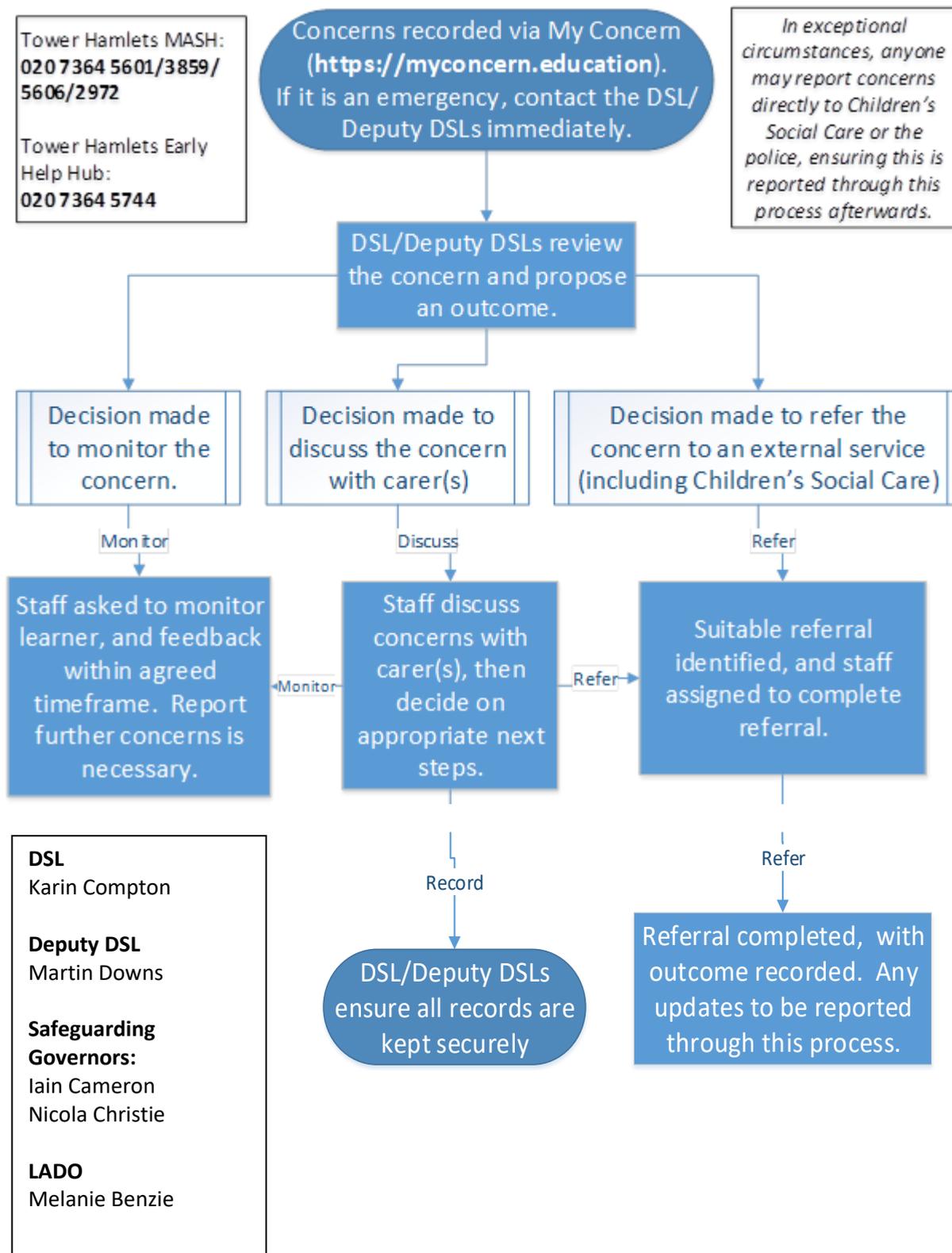
All staff not on the above list within the first 3 months of employment at South Quay College

Safeguarding Training (Level 1)

Delivered to all staff at Induction prior to engaging with students.

¹⁶ A full description of regulated activity can be found in the factual note [Regulated activity in relation to children: scope](#).

Appendix A – Safeguarding Flowchart for managing concerns about a student



Appendix B – Key Contacts and Information

Designated Safeguarding Lead:

Karin Compton: 020 3727 6263 (karin.compton@southquaycollege.org.uk)

Deputy Designated Safeguarding Leads

Martin Downs (martin.downs@southquaycollege.org.uk)

Chair of Governors:

Simon Appleby (simon.appleby@southquaycollege.org.uk)

Safeguarding representative on the Board of Governors:

Iain Cameron (Iain.Cameron@towerhamlets.gov.uk)

Nicola Christie (nicola.christie@btinternet.com)

Designated Teacher for Looked After Children:

Karin Compton (karin.compton@southquaycollege.org.uk)

Safer Schools Officer:

PC James Rickett 3528CE. James.Ricketts@met.police.uk

Tower Hamlets MASH (Children's Social Care): 020 7364 5601/5606

Tower Hamlets Early Help Hub: 020 7364 5744

Tower Hamlets Adult Safeguarding Service: 020 7364 5005

Tower Hamlets LADO:

Melanie Benzie

Email: LADO@towerhamlets.gov.uk

Secure email: LADO@towerhamlets.gcsx.gov.uk

Tel: 020 7364 0677

NSPCC Child Protection Helpline: 0808 800 5000

NSPCC Whistleblowing Helpline: 0800 028 0285

Anti-Terrorist Hotline: 0800 789 321

Department for Education Prevent Helpline: 020 7340 7264

Childline

Tel: 0800 1111

For further support services please reference J:/ Safeguarding/Forms/Safeguarding Referral Directory.