

Brampton College Safeguarding Policy (including Child Protection)

September 2023

The safety and welfare of all our pupils at Brampton College is our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment so that every student can learn in safety. In all matters relating to child protection the college will follow the procedures laid down by the Barnet MASH team which is the single point of entry for all referrals regarding concerns for a child or young person (unborn to 18 years) or where it is felt they would benefit from additional support. We will also follow the DoFE guidance contained in Working Together to Safeguard Children (2018) and departmental advice 'What to do if you are worried a child is being abused- Advice for practitioners' and Keeping Children Safe in Education (2023). This policy is applicable to the whole college community.

All members of staff have a duty to safeguard our students' welfare and must therefore familiarise themselves and comply at all times with this policy. This includes a duty both to children in need and to children at risk of harm. All staff should read and **understand** at least Part 1 and Annex A of KCSIE. All college staff should be aware that safeguarding incidents can happen at any time and anywhere and are required to be alert to any possible concerns.

All college staff should identify children that may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance, staff should discuss early help requirements with the designated safeguarding lead. Staff may be required to support other agencies and professionals in an early help assessment.

Anyone who has a concern about a child's welfare should ensure a referral is made to children's social care. In the first instance, staff should generally discuss any potential referral with the designated safeguarding lead, who in most instances would make any referral. Staff may be required to support social workers and other agencies following any referral.

Leadership in Safeguarding

The College proprietors have a strategic leadership responsibility its safeguarding arrangements and will ensure that they comply with their duties under legislation, having regard to government guidance and ensuring policies, procedures and training are effective, comply with the law at all times. In this respect, the College will have regard in particular to the provisions of the Human Rights Act 1998 (Articles 3, 8 and 14, and Protocol 1, Article 2) and the Equality Act 2010 in respect of careful consideration of support for pupils with protected characteristics. This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England, including the prohibition of the use of corporal punishment. The College proprietors will ensure that safeguarding policies and procedures are understood and followed by all staff, that all staff undergo safeguarding and child protection training (including online safety) at induction and that training is regularly updated. They will ensure that the college adopts a whole-college approach to safeguarding, in which safeguarding underpins all relevant aspects of process and policy and in which all systems, processes and policies operate with the best interests of the child at heart.

Proprietors and college leaders will ensure that safeguarding systems are well promoted and easily understood and accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback, and in which the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

In addition, the proprietors will ensure that child protection files are maintained as set out in Annex C of KCSIE 2023 and appropriate safer recruitment policies are in place in accordance with Part three; and ensure an appropriate senior member of staff, from the college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead will take lead responsibility for safeguarding and child protection (including online safety).

What is child abuse?

All college staff should be aware abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The College will be informed by the guidance on peer-on-peer sexual violence and sexual harassment in KCSIE 2021 and 2022 as regards training staff and responding effectively to reports of incidents.

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

Students with Special Educational Needs (SEN) and disabilities

The College recognises that students with SEND requirements may face additional safeguarding challenges. There can be additional barriers to recognising abuse and neglect in this group of students. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's impairment without further exploration;
- students with SEN and disabilities can be disproportionately impacted by things like isolation or bullying- without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Specific Safeguarding Issues

Staff will use expert and professional organisations to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information can be found on the TES website and the NSPCC website and there is information from Optimus for staff.

Staff will also be informed by broad government guidance on the issues listed below via the GOV.UK website:

Children absent from education

The college will monitor all student absences from school and promptly address concerns about irregular attendance with the parent/carer. In some circumstances, the College has a legal duty to report absences to the Local Authority.

The College will inform their local authority of any pupil who is going to be deleted from the admission register where they:

- have been taken out of school by their parents and the school has received written notification from the parent they are being educated outside the school system e.g., for home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;

- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- have been permanently excluded.

The College will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the college's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

The college will also inform the relevant local authority immediately if that child is removed from roll so that the local authority can as part of their duty identify children of compulsory school age who are missing education.

More information on this can be found at KCSIE 2023, page 24

Child Missing from Home or Care

If a child did go missing from home or care the college would cooperate with other agencies in the early and effective sharing of information between professionals and local agencies to identify patterns of behaviour. Relevant data may include times and duration of missing episodes, information from return interviews, absence data from schools, etc. would be provided to MASH at Barnet if required.

More information on this can be found at this link: [child missing from home or care](#)

Child criminal exploitation: "county lines".

The college will raise awareness in its Safeguarding Training of Child Criminal Exploitation, in particular, "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 involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism

(<http://www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre/national-referral-mechanism>) should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources. Both boys and girls can be at risk of criminal exploitation, and both can be at risk of sexual exploitation in this context.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society County Lines Toolkit For Professional

Child sexual exploitation

The College will raise awareness of Child Sexual Exploitation in its Safeguarding Training. Child sexual exploitation is a form of child sexual abuse, where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation doesn't always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

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

More information on this can be found at this link: [child sexual exploitation \(CSE\)](#)

Bullying involving Cyberbullying

The college will provide education to students on e-safety and ensure that all students understand and adhere to the college's guidelines in this area. This includes guidance for pupils on staying safe online. For more details on cyber-bullying please refer to the college's anti-bullying policy. E-safety for students is taught through PT sessions and assemblies and to the GCSE students in PHSE.

All teaching and admin staff completed the revised 2021 OSA course in e-safety, which addresses the specific concerns around online threats to children's wellbeing addressed in KCSIE 2021 and 2022. Training in threats posed by "the 4 C's" (content, contact, conduct and commerce) is a core feature of this course. With regard to the emphasis upon the challenges and opportunities for safeguarding related to Filtering and Monitoring in KCSIE 2023, College staff have this September completed the National Cyber Security Centre course for teachers in Cyber Security.

More information on this can be found at this link: [bullying including cyberbullying](#)

Domestic Violence

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn

The college will raise awareness in its staff training of the possibility for our students of domestic violence and abuse. These terms are defined as being 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
- emotional

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

The changes to the definition of domestic violence raise awareness that young people in the 16 to 17 age group can also be victims of domestic violence and abuse. Staff should encourage young people to come forward and get the support they need, through a helpline or specialist service.

More information on this can be found at this link: [domestic violence](#)

Drugs

As part of the College's statutory duty to promote pupils' wellbeing, the college will endeavour to:

- Provide accurate information on drugs and alcohol through education and targeted information;
- Tackle problem behaviour in schools, with wider powers of search and confiscation;
- Work with local voluntary organisations, health partners, the police and others to prevent drug or alcohol misuse

More information on this can be found at this link: [Drugs](#)

Faith Abuse

The college takes the view that child abuse is never acceptable wherever it occurs and whatever form it takes. Abuse linked to belief, including belief in witchcraft or possession, is a horrific crime which is condemned by people of all cultures, communities and faiths.

Key messages

- Child abuse is condemned by people of all cultures, communities and faiths, and is never acceptable under any circumstances.
- Everyone working or in contact with children has a responsibility to recognise and know how to act on evidence, concerns and signs that a child may be suffering, or is likely to suffer, significant harm.
- Standard child safeguarding procedures apply in all cases where abuse or neglect is suspected, including those that may be related to particular belief systems.
- The number of cases of child abuse linked to faith or belief in spirits, possession and witchcraft is believed to be small, but where it occurs it causes much distress and suffering to the child. It is likely that a proportion of this type of abuse remains unreported.
- Abuse linked to faith or belief may involve a wider context, where the child is treated as a scapegoat in circumstances of family stress, deprivation, domestic violence, substance abuse and mental health problems.

More information on this can be found at this link: [faith abuse](#)

Female Genital Mutilation (FGM)

In its safeguarding training, the college will raise staff awareness of FGM and the duty to report it to the police. This 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. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

All teachers (along with social workers and healthcare professionals) have a statutory duty to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils.

For the purposes of the mandatory reporting duty, a teacher is someone who undertakes teaching work as follows (including through distance learning or computer aided techniques):

- planning and preparing lessons and courses for pupils;
- delivering lessons to pupils;
- assessing the development, progress and attainment of pupils; and
- reporting on the development, progress and attainment of pupils.

These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the head teacher to provide such direction. The mandatory reporting duty will not therefore apply to supervised teaching assistants.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve children's social care as appropriate

The local police non-emergency number is 101 or 0207 1618952.

More information on this can be found at this link: [female genital mutilation \(FGM\) and gender- based violence/violence against women and girls \(VAWG\)](#)

Forced Marriage

Safeguarding training will also raise awareness of Forced Marriage. A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

There is a clear distinction between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement still remains with the prospective spouses. However, in forced marriage, one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. In the cases of some vulnerable adults who lack the capacity to consent, coercion is not required for a marriage to be forced. The pressure put on people to marry against their will can be physical or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor. It can happen to both women and men, although many of the reported cases involve young women and girls aged between 16 and 25. There is no "typical" victim of forced marriage. Some may be over or under 18 years of age, some may have a disability, some may have young children and some may also be spouses from overseas.

The college will follow guidance for dealing with forced marriage given in The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk) School and available from the Forced Marriage Unit (Contact: 020 7008 0151).

CHART OF POTENTIAL WARNING SIGNS OR INDICATORS

These indicators are not intended to be an exhaustive list. EDUCATION			
Absence and persistent absence. Request for extended leave of absence and failure to return from visits to country of origin. Fear about forthcoming school holidays	Surveillance by siblings or cousins at school. Decline in behaviour, engagement, performance or punctuality. Poor exam results.	Being withdrawn from school by those with parental responsibility. Removal from a day centre of a person with a physical or learning disability	Not allowed to attend extra-curricular activities Sudden announcement of engagement to a stranger Prevented from going on to further/higher education

More information on this can be found at this link: [forced marriage](#)

The College notes that the legal age of marriage in the UK is now (from February 2023) 18 years.

Gangs and Youth Violence

The College will raise awareness in its training of the danger of gangs and youth violence (cf. child criminal exploitation and sexual exploitation, above), make all efforts to prevent it occurring and to respond effectively to any incidences of it. The College recognises that 'early intervention' includes anti-bullying and a curriculum that ensures that young people develop the social and emotional skills they need in order to meet their full potential. During the year the college will provide workshops, assemblies and tutor time to ensure students develop conflict resolution skills, understanding risky situations, and violence and abuse should be clearly defined so that young people know when to seek help.

More information on this can be found at this link: [gangs and youth violence](#)

Serious Violence

Staff are aware of the dangers of students being exposed to and falling under the influence of groups involved in serious violent crime and of the signs that may indicate children's vulnerability to or involvement with them, such as unexplained increased absence from school, significant decline in performance, changes in friendship groups, development of relationships with older individuals or groups, signs of self-harm, decline in wellbeing, signs of assault or of unexplained injury. Unexplained new possessions or gifts may indicate that children have been approached by or become involved with individuals or groups connected with criminal gangs. All staff understand that they must report any concerns they have about a student in this regard to the DSL and the Principal.

Staff have been made aware of the Home Office guidance available on this subject in **Preventing Youth Violence and Gang Involvement, and in Criminal Exploitation of Children and Vulnerable Adults: County Lines**

Mental health

Mental health is everyone's business – every year at Brampton College we endeavour to ensure staff who spend time with students have the skills and knowledge to understand mental health issues. The message we want staff and students to understand is that good mental health and resilience are fundamental to our physical health, our relationships, our education, our training, and our work and to achieving our potential. New students coming to the college are asked to join workshops in their first month with us where they can be encouraged to build resilience and ensure they know where to go for support and help if they should need it.

More information on this can be found at this link:

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

[mental health](#) and [mental health first aid](#)

Preventing radicalisation (the Prevent Duty)

We recognise that it is a key role of the college to support young people and that the college may provide stability in the lives of children who may be at risk of harm. We also recognise that our pupils can be susceptible to exploitation by others, and in particular to the risks posed by inappropriate internet content. Staff will be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination.

Staff acknowledge the need for a culture of vigilance to be present in the college to support safeguarding. This includes awareness and sensitivity to attitudinal changes of pupils which may indicate they are at risk of radicalisation.

Staff will consider the level of risk to identify the most appropriate referral, which could include reference to Channel or Children's Social Care. Contact details for support and advice on the Prevent Duty can be found below.

The Department of Education statutory Prevent Duty guidance can be accessed on:

<https://www.gov.uk/government/publications/prevent-duty-guidance>

The Channel General Awareness course can be accessed on the link below:

<https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance>

It is a college requirement to complete the general awareness course listed above.

More information on this can be found at this link: [Radicalisation and child protection | NSPCC Learning](#)

Peer on peer abuse

All staff are aware that children can abuse other children (“peer-on-peer abuse”) and will strive to maintain the values, conditions and relationships that militate against instances of its most common forms, as identified in KCSIE 2019 and again in particular relation to sexual violence and sexual harassment as discussed in KCSIE 2021 and 2022. At the same time, the College will also seek to ensure that children understand that the law on peer on peer abuse exists to protect them and not to criminalise them.

The college will take the approach and raise the awareness of all staff that sexual harassment and violence could happen here. We will adopt a *zero-tolerance approach to harmful sexual behaviour*.

The college will take all reports of harmful sexual behaviour seriously, including apparently innocuous incidents, in order that a dangerous culture of acceptance of such behaviour should not develop.

The college will have regard to the guidance in part 5 of KCSIE 2022 concerning all aspects of disclosures and reports, the wishes of the victim and the need to protect the general student population, possibility of intrafamilial harms, and in whether to report incidences, according to their level of seriousness, to the local authority safeguarding team and/or the police.

All staff are aware that children can abuse other children, and that it can happen both inside and outside of school or college and online. Staff will recognise the indicators and signs of possible peer on peer abuse and know how to identify it and respond to reports.

Exclusionary behaviour can include intimidating, isolating or excluding a person from a group; the college recognises that SEND students may be particularly vulnerable to peer group isolation or bullying (including prejudice-based bullying) than other children.

The college also recognises the gendered nature of peer-on-peer abuse; that girls are more likely to be the victim and boys the perpetrators.

The College also recognises that children who are, or are perceived to be, LGBT can be targeted by other children and will always seek to provide a trusted adult with whom they can be open. We will endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff. The LGBTQ lunchtime club, run by students and a member of staff, is one such measure. LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum in PSHE lessons.

The College’s policy is to offer support to victims, perpetrators and any other children affected by peer-on peer abuse. We will do this via our counselling support services, support from teachers and Personal Tutors and external agencies where appropriate. Perpetrators will be supported to change his/her behaviour. This may include clear instructions

and a warning or final warning. The College will ensure that the bullying child knows what the problem behaviour is, that it is wrong and harms others. We will show the bullying child that this behaviour is taken seriously and will not be tolerated

All staff should understand, that even if there are no reports in the college, that does not mean it is not happening: it may be the case that it is just not being reported. **As such, it is important that staff having any concerns regarding peer-on-peer abuse speak to the DSL, Mike Wheeldon, or to the Deputy DSLs, Sam Kaltsa and Lindsey Jacobs. Staff receiving disclosures from students should do so according to the steps for disclosures set out below and reported immediately to the DSL or a Deputy DSL.**

All staff must understand the importance of challenging inappropriate behaviours between peers that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Bullying (including cyberbullying) – see also the Bullying Policy.

Physical abuse, such as hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm

Initiation or “hazing” type violence and rituals

Sharing of nude or semi-nude images

This practice has prompted considerable worry and controversy. In particular, the practice may be a sign that children are at risk now as well as compromising their futures with images that could be permanently available to colleges, employers and child pornography traffickers. Young people may be charged with serious sex crimes and placed on lifelong sex offender registries for impulsive teenage indiscretions. Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal – and whilst non-consensual is illegal and abusive.

Youth-produced sexual images of an illegal nature are pictures created by minors (age 17 or younger) that depict minors and that are or could be child pornography under applicable criminal statutes, and those images sent by any electronic technology (e.g., cell phone, webcam, digital camera). In addition, they include the full range of such incidents that come to the attention of law enforcement, including those involving adults and situations that do not involve romantic relationships.

The College will have regard to the D of E’s document, *Searching Screening and Confiscation Advice for schools and the UKCIS Education Group publication, Sharing nudes and semi-nudes: advice for education settings working with children and young people which outlines how to respond to an incident of nudes*

More information on this can be found at this link: <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

“Upskirting” – in this connexion, staff are also made aware in their training of the possibility of students’ perpetrating and falling victim to this practice, now a criminal offence, which involves taking pictures under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, and/or cause the victim humiliation, distress or alarm.

Teenage relationship abuse

This form of abuse refers to causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

The college will raise awareness in its training of research by the NSPCC showing that teenagers didn't understand what constituted abusive behaviour, such as controlling behaviour (which could escalate to physical abuse), e.g., checking someone's phone, telling them what to wear, who they can/can't see or speak to, and that this abuse was prevalent within teen relationships. This led to these abusive behaviours feeling 'normal' and therefore left unchallenged as they were not recognised as being abusive.

Further research showed that teenagers didn't understand what consent meant within their relationships. They often held the common misconception that rape could only be committed by a stranger down a dark alley and didn't understand that it could happen within their own relationships. It is the college's policy to use tutor times, the behaviour policy, PHSE lessons (where RSE is part of the curriculum) and assemblies to challenge and inform this behaviour.

More information on this can be found at this link: <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

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) is aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. 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 social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. We will follow the guidance issued by the Department and the Ministry of Housing, Communities and Local Government on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets

Modern Slavery and Trafficking

The college has used, and will continue to invite, speakers from 'Stop the Traffic' to explain many of the issues linked to trafficking. These have covered wider issues of modern slavery and injustice but the speakers have also used the opportunity to explain the need for personal safety on holiday and when using the internet. Without alarming students the message that this 'could not happen to you' is stressed and also increases the students awareness of injustice and the plight of other young people.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk) and via the link: [trafficking](#)

Community safety

The college recognises that incidents in the surrounding area can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. The college undertakes to give practical advice to our students on how to keep themselves safe outside the immediate area of the college.

Children and the court system

The College recognises that the separation and divorce of parents can result in very stressful circumstances for children. The college undertakes to offer students in this position the opportunity of counselling and, if a student has to attend a family court, to follow the guidance provided in publications such as Going to Court and being a witness (12-17 year olds).

Children with family members in prison

The college recognises that very occasionally a student may be at risk of poor mental health, stigma, and isolation as a result of a family member being in prison. We will in such cases follow the advice given by The National Information Centre on Children of Offenders, (NICCO) to help mitigate negative consequences for those children.

Transparency

Brampton College prides itself on its respect and mutual tolerance. Parents/guardians have an important role in supporting Brampton College. Copies of this policy, together with our other policies relating to issues of child protection are on our website and we hope that parents and guardians will always feel able to take up any issues or worries that they may have with the school. Allegations of child abuse or concerns about the welfare of any child will be dealt with consistently in accordance with this policy. Open communications are essential.

Safer Employment Practices

Brampton College follows the Government's recommendations for the safer recruitment and employment of staff who work with children and acts at all times in compliance with the Independent School Standards Regulations. Please also see the College's recruitment Policy.

In line with Part 3 of the DfE's guidance 'Keeping Children Safe in Education' (KCSIE September 2022), the Proprietor (the controlling director of Brampton Educational Services Ltd trading as Brampton College) prevents people who pose a risk of harm from working with pupils by adhering to statutory responsibilities to check all staff who work with children, taking proportionate decisions on whether to ask for any checks beyond the minimum required, and ensuring volunteers are appropriately supervised. Organisations providing contractors or consultants working on site are asked for assurances that where relevant and required, their staff have been suitably vetted in line with legal requirements.

The College works with external agencies where appropriate including inter-agency working on the part of the DSL and attendance at strategy meetings.

As part of carrying out safe recruitment procedures under KCSIE, members of the teaching and non-teaching staff at the school including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment.

Alternatively, if the applicant has subscribed to it and gives permission, the school may undertake an online update check through the DBS Update Service.

Further to the DBS check, anyone appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching by order of the Secretary of State. Those undertaking management posts will be subject to prohibition from management of independent schools checks.

As a standard part of the safer recruitment procedure, the College will inform applicants for any position at the college that online searches, for example of an applicants' social media, will be carried out as part of due diligence checks.

All governors, volunteers and contractors working regularly during term-time are also subject to the statutory DBS checks. Confirmation is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils at school or on another site.

Should the college develop concerns about an existing staff member's suitability to work with children, it will carry out all relevant checks as if the individual were a new member of staff.

This policy is reviewed by the college and by the proprietor annually. Please also refer to the college's Recruitment Policy for further details.

Raising Awareness

Mike Wheeldon is the Designated Lead on Safeguarding. Included in his duties is the responsibility to liaise with the local authority on issues of child protection or in case of allegations against the Principal or any of the directors of Brampton Educational Services Ltd. He will carry out an annual review of the college's safeguarding policy and procedures and report back to the Principal. The proprietor is responsible for:

- reviewing the procedures for and the efficiency with which the safeguarding duties have been discharged;
- ensuring that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay;
- approving amendments to safeguarding arrangements in the light of changing regulations or recommended best practice.

We recognise that the college plays a significant role in the prevention of harm to our students by providing good lines of communication with trusted adults, supported friends and an ethos of protection. We include within this the emotional wellbeing of our pupils and recognise the role college plays in recognising and protecting our students who may be vulnerable to radicalisation or exposed to extremist views.

Designated Safeguarding Lead

Mike Wheeldon, Vice Principal, is our Designated Safeguarding Lead (DSL) or in his absence, the Deputy DSLs, Sam Kaltsa and Lindsay Jacobs. Both the DSL and his deputies have been fully trained for the demands of this role in child protection and inter-agency working in accordance with the locally agreed procedures and as set out in Annex B of Keeping Children Safe in Education. Both regularly attend courses with child support agencies to ensure that they remain conversant with best practice. They undergo refresher training every year and they both have a job description for their safeguarding roles and key activities. The DSL role is to ensure that each member of staff has access to and is aware of and understands the school's safeguarding policy and procedures. Their training meets the requirements of the DfE's 'Keeping Children Safe in Education' (KCSIE) and will liaise with the local authority and work with other agencies in line with Working Together 2018 www.gov.uk/government/publications/working-together-to-safeguard-children--2

The DSL can be contacted at any time.

The DSL maintains close links with the MASH hub for Barnet and reports at least once a year to the proprietor on the child protection issues outlined above. The DSL will make prompt contact with children's social care where there are concerns that a child may be in need of help or is at risk of harm. The DSL will also make prompt contact with the Local Authority Designated Officer ("LADO") in relation to allegations against someone working at the school and/or the police if a criminal offence is suspected.

The DSL will liaise with the local authority when necessary and work with other agencies in line with Working Together to Safeguard Children 2018 and attendance at strategy meetings. The DSL will work with partner agencies to seek advice, support and guidance, drawing on multi agency expertise, knowledge and experience to support pupils at risk of harm including emotional and intellectual harm via social media and use of the internet.

The DSL receives focused training to support learning and understanding of the ever-changing landscape of safeguarding which is underpinned by legislation and guidance and includes issues such as radicalisation. The DSL's and the College's focus is to support children in need through seeking early help and/or inter agency working, including using the Team around the Child Approach and/or the Common Assessment Framework.

The college's records on child protection are kept securely in the management folder in a child protection folder, which is separated from routine pupil records. Access is restricted to the DSL, the Principal and the Vice Principal, and the deputy DSL.

Induction and Training

Every new member of staff, including part-timers, temporary, visiting, volunteers and contract staff working in the school, receives appropriate induction training on their responsibilities in being alert to the signs of abuse, on-line safety, bullying or children at risk of radicalisation and on the procedures for recording and referring any concerns to the DSL or the Principal and, if required, to the main points of local procedures of Barnet's local authority to which referrals are made.

Details of Barnet's arrangements can be seen by visiting the following website: <https://www.barnet.gov.uk/bscb-home/professionals-.html>

All members of staff have been asked to carry out particular training for the prevention of radicalisation by completing the following on line course: http://course.ncalt.com/Channel_General_Awareness

The College has kept a copy of staff training in the staff training record.

The Principal and all staff attend regular refresher training in line with advice from Barnet's LSCB with the designated persons (the DSL and the two Vice Principals) receiving training every two years. Training in child protection and safeguarding is an important part of the induction process. More detail is set out in our policy on 'Induction of New Staff in Child Protection'. Training includes a review of the college's safeguarding policy including the staff code of conduct policy/behaviour policy, the school's whistleblowing policy, awareness training to equip staff to identify children at risk of being drawn into terrorism, the identity of the DSL and a copy of Part 1 and Annex A of KCSIE 2021. Training also promotes staff awareness of child sexual exploitation, forced marriage and female genital mutilation. Staff are made aware of the signs, symptoms and indicators of such practices and are required to take action without delay if such a practice is suspected.

All new staff must read and sign to confirm that they have read Part 1 of KCSIE 2022 and the relevant school policies listed in our Induction of New Staff in Child Protection policy.

All staff completed in September 2021 the OSA online safety CPD training, an accredited course ensuring those working with children have an up-to-date knowledge of the statutory requirements they must meet, the threats to children online, how to reduce these risks, and guidance on ensuring staff use of digital technology is safe and responsible

Staff Obligations

Disqualification from providing childcare or registration, including 'by association'

The Childcare (Disqualification) Regulations 2009 apply to those providing early years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 AND to those who are

directly concerned in the management of that childcare. Therefore, this regulation has not direct application to staff at Brampton College where the youngest student is 15.

However, the College takes its responsibility to safeguard young people very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the college immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

Content Filtering Service

The College recognises that an effective approach to the question of access to appropriate internet content is one that involves the specific attention not just of the DSL and his Deputies, the SLT and the IT manager, but all staff, in terms of striking an appropriate balance between protection from harm, on the one hand, and learning opportunities, including those to do with risk and real-life experience, on the other. The college will filter internet content which is clearly harmful or inappropriate, such as that encouraging discrimination, drug abuse, extremism, violence, pornography or self-harming, but allow and monitor access to sites that might refer to or be adjacent to such content if it is being used in an appropriate educational manner. Teacher observation and education around such appropriate access is a vital part of this monitoring. This is especially the case since a great deal of students' internet-based activity comes, both in college and outside, from independent sources such as 4G, or, increasingly via VPN, beyond our filtering and monitoring processes, as well as the increasing emphasis placed on privacy by internet providers.

Decisions about monitoring will operate on the basis of an assessment of risk, considering both the likelihood and the potential harm that access to content might pose. We also recognise that, generally speaking, our younger students may be more at risk than those in the sixth form, and some decisions about access may be age-determined. All such decisions will be taken the DSL and his Deputies, although the IT Manager may place a temporary ban on access as an immediate safety measure. The DSL receives notifications of content blocked by the firewall.

The College will, in accordance with *Keeping Children Safe In Education 2023*, review the selection of content categories and sites on an annual basis and whenever there is a major technological change but respond to individual requests to allow access to sites that might normally be blocked as and when they arise.

The College undertakes to educate students about and to protect them from the dangers of such activities through raising staff awareness, for example in the ONS Safeguarding course and the NCSC Cyber Security training, along with assemblies, PT activities and PSHE lessons. Our communications to parents will be used to reinforce the importance of children being safe online.

The college uses a CFS firewall appliance (Content Filtering Service), which is based on a rating architecture that relies on a dynamic database to block objectionable or inappropriate websites.

CFS cross-references all websites as they are requested against a vast and highly accurate database of URLs, IP addresses and domains. The firewall then receives a rating in real time, and compares that rating to the local policy setting. The appliance will then either allow or deny the request, based on locally configured policy.

The Content Filtering Service has categorized over 20 million URLs, IP addresses and domains in a continuously updated, dynamically rated database, with thousands more added daily.

Because the ratings are determined both by artificial intelligence and human observation, the database is highly accurate and the instance of false positives is minimized. The policy-based system allows the administrator to block all pre-defined categories or any combination of categories, and to apply these policies on a granular level. For example, if one group of users requires access to sites typically found within one category, this level of access can be granted while still denying access to other users.

Categories range from offensive types of content such as "Violence," which would include anti-social websites that advocate use of weapons or explosives, to sites that may not be offensive but would otherwise cause a potential risk to the network in terms of bandwidth usage, such as "Freeware/Software downloads" or "Multimedia."

Since September 2016 the college has been using SmoothWall firewall appliance along with e-Safe service:

- Intelligent endpoint monitoring for safeguarding and e-safety
- Behaviour monitoring tools to help meet safeguarding and e-safety obligations by analysing conversations and images being shared across college devices.
- e-Safe service provides us with a tool for monitoring:
 - which websites are being visited, their content and any actions being taken, giving us the ability to provide advice on intervention and support
 - contents of messages being sent to and from locations on the college network. Once a message has been flagged for human review, e-Safe's forensic specialists identify any risky behaviour and report it to the college's nominated safeguarding and pastoral care contacts.
- all static and moving images as they are being transferred through the network, even over Skype and webcams.

Reporting

- The appliance generates daily incident reports to alert our DSL of safeguarding incidents so steps can be taken to intervene, and to generate a record to show how the college is actively handling situations.
- Incidents are checked against current and historical activity to identify progressive or escalating issues such as radical and extremist behaviour, self-harm, sexting, grooming, and bullying.

This enables the college to target key issues that affect children, young people and adults. We recognise the duty of care towards the young people and adults we work with. This enables us to relevant measures to safeguard these individuals against the risks of **cyberbullying, sexual abuse, drugs, mental health, self-harm, radicalisation and more.**

SmoothWall e-Safe service

- Safe and timely intervention can only be achieved if the person reviewing the material understands the context of the conversations and the euphemisms and slang terms used by young people. Unlike software-only monitoring, the e-Safe service removes the need for untrained college staff to spend hours reviewing data for potential safeguarding incidents.
- Inappropriate activity and risk is not limited to online behaviour and can happen anywhere offline - e-Safe provides protection wherever the device is located.
- Monitoring is carried out by highly trained child protection specialists.

- Students identified as most vulnerable receive threat level prioritisation and early flagging to prevent incident recurrence.

The college will make use of a range of resources in training staff, teaching students and raising awareness among parents of online safety, such as those listed in paragraph 132 and Appendix B of KCSIE 2023, p145.

Visiting Speakers

The Prevent statutory guidance requires schools to have clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The College's responsibility to our students is to ensure that they can critically assess the information that they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The College is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the College. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that where appropriate their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the College may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the College site, will be supervised by a College employee. On attending the College, Visiting Speakers will be required to show original current identification document including a photograph such as a passport or photo card driving licence. The College shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

Use of Mobile Phones and Cameras

Please see the school's Data Protection Policy for the School's policy on taking photographs of pupils outside of these year groups.

Procedures for dealing with allegations or concerns about a child

The college treats the safeguarding of the pupils in its care as the highest priority and recognises the important role it has to play in the recognition and referral of children who may be at risk. All our college staff are made aware of their duty to safeguard and promote the welfare of children in the college's care. Staff members are alerted to the particular potential vulnerabilities of looked after children. The college wishes to engender a culture of openness and safety and therefore staff are encouraged to report any concerns that they have regarding safeguarding to the DSL, or in her absence, the Principal or Vice Principals.

Staff are reminded that the college's Whistleblowing Policy can be utilised if necessary.

Every member of staff, including part-timers, temporary, visiting, contract and volunteer staff working in school is required to report instances of actual or suspected child abuse or neglect to the DSL. This includes alleged abuse by

one or more pupils against another pupil. Reference will be made to an external agency if there is risk of significant harm.

If staff members are unsure they should always speak to the DSL. In exceptional circumstances such as in an emergency or a genuine concern that appropriate action has not been taken, staff members can speak directly to children's social care. If a referral to children's social care is appropriate in most instances the designated safeguarding lead should make it. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made they can and should consider making a referral themselves.

The DSL will report safeguarding concerns to the Principal, or in his absence the Vice Principals. Where there is reasonable cause to suspect that a child is suffering, or likely to suffer significant harm, a referral to Children's Social Care will be made immediately. For children in need of additional support from one or more agencies, the college will co-operate with police and social services to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of *Working Together to Safeguard Children*.

The school's local authority is BARNET Council

If after a referral the child's situation does not appear to be improving the designated safeguarding lead (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the child's situation improves.

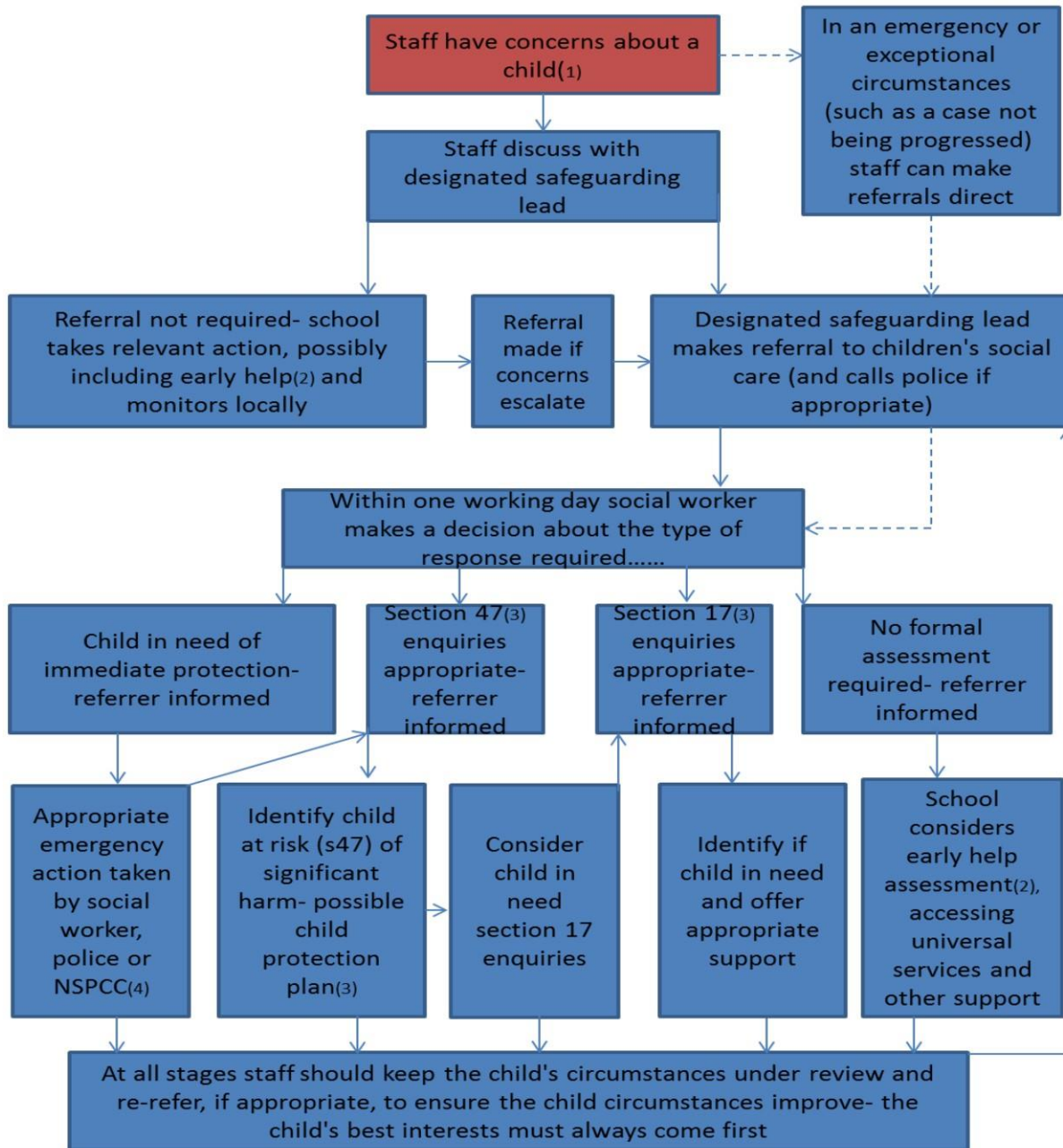
If it is decided that rather than child protection (Section 47) measures, Early Help is more appropriate, then the Designated Safeguarding Lead will support the relevant teachers, particularly the Head of Learning Support in liaising with other agencies and setting up an inter-agency assessment as appropriate.

If Early help and or other support is appropriate the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation doesn't appear to be improving.

If, a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Anybody can make a referral.

It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and Serious Case Reviews have repeatedly shown the dangers of failing to take effective action. Poor practice includes: failing to act on and refer the early signs of abuse and neglect, poor record keeping, failing to listen to the views of the child, failing to re-assess concerns when situations do not improve, sharing information too slowly and a lack of challenge to those who appear not to be taking action.

Actions when there are concerns about a child



External agency contact information

The school's points of contact for children who are the focus of concern are as follows:

<https://thebarnetscp.org.uk/bscp/professionals/lado-1>

MASH can be contacted on **020 8359 4066** if you are concerned about a child or young person in Barnet during working hours. Outside of these hours, care and welfare concerns about children and young people that need an immediate response should be reported to the Emergency Duty team on **020 8359 2000**. Where an emergency response is required, the Police should be called on 999 at any time.

Local Area Designated Officer (LADO for Barnet)

Shrimatie Bissessar

0208359 4528 Barnet's MASH Team

Opening Hours:

9am – 5.15pm Monday to Thursday

020 8359 4066 / 4097

Fax 020 8445 8032

9am – 5pm Friday

9am to 12.30pm Referrals / Discussions / Advice with Duty Workers 1.30pm to 5pm Emergency Calls Only

Designated safeguarding lead Mike Wheeldon is available on the College number 020 8203 5025

Information about prevent can be found on the following website: <http://www.preventtragedies.co.uk/>

Out of Office Hours Emergency Social Work Service

(Including out of hours Child Protection Referrals)

020 8359 2000

The Barnet Council Emergency Service Controller will take initial details and contact the appropriate out of hours officer.

When allegations are made against staff – contact John Paul Brookes

Consultation Line

(9.30am - 11.30am Tuesday and Wednesday)

020 8359 4336

This number is available for consultation, advice or when you just want to talk over a situation and case names are not required

Police Emergency - 999

Police Non-Emergency - **101 or 0207 1618952**

The following numbers may be useful for pupils:

BARNET Contact Centre 020 8359 4066

Childline 0800 1111

NSPCC 0808 800 5000

OFSTED Safeguarding Children

08456 404046 (Monday to Friday from 8am to 6pm)

Whistleblowing@ofsted.gov.uk

The school's points of contact for children who are in need of help are as follows:

BARNET Contact Centre 020 8359 4066

Extremism:

Department for Education dedicated helpline for staff and governors: 020 7340 7264 and counter-extremism@education.gsi.gov.uk

Other useful contacts

Disclosure and Barring Service PO Box 3963, Royal Wootton Bassett SN4 4HH, tel: 03000200190

Procedures for dealing with all disclosures/allegations of abuse

Allegations of abuse may be made against a member of staff, including the Principal, a volunteer, a contractor, a governor, a pupil, parent or other person connected to the college.

Allegations of abuse against teachers and other staff will be dealt with according to the statutory guidance set out in part four of KCSIE. Staff should also have regard to the Staff Code of Conduct to minimise the risk of allegations being made.

If a member of staff is made aware of **any** allegation of abuse, or if knowledge of possible abuse comes to his/her attention it is his/her duty to listen to the child, to provide re- assurance and to record the child's statements, but not to probe or put words into the child's mouth.

On hearing an allegation of abuse or complaint about abuse directly from a child, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided. No inappropriate guarantees of confidentiality should be given; rather the child should be told that the matter will be referred in confidence to the appropriate people in positions of responsibility.

The member of staff should make and submit an accurate written record and inform the Principal (or in his absence a Vice Principal) and the DSL **immediately** so that appropriate agencies can be informed within 24 hours and the matter resolved without delay. The DSL will contact the Local Authority Designated Officer (LADO also known as DO) for advice or direction and will inform Ofsted if appropriate.

1. Initial Complaint

A member of staff suspecting or hearing a complaint of abuse:

- Must listen carefully to the young person and keep an open mind. Staff should not take a decision as to whether or not the abuse has taken place.
- Must not ask leading questions, that is, a question which suggests its own answer.
- Must reassure the young person but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information to the Designated Person who will ensure that the correct action is taken.

- Must keep a sufficient written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the Designated Person as soon as possible.

2. Preserving Evidence

All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, and computers), must be safeguarded and preserved.

3. Reporting

All suspicion or complaints of abuse must be reported to the Designated Person, or if the complaint involves the Designated Person, to the Principal. If a conflict of interest arises in regard to a concern that would normally be reported to the Principal, the concern should be reported directly to the LADO at LB Barnet MASH on 0208359 4066.

4. Referral Guidelines

A referral to the SSD or police will not normally be made where:

- the complaint does not involve a serious criminal offence; and
- a referral would be contrary to the wishes of a student complainant who is of sufficient maturity and understanding and properly informed, and contrary also to the wishes of the complainant's parents; and
- the case is one that can be satisfactorily investigated and dealt with under the College's internal procedures, the parents being kept fully informed, as appropriate.

However, if during the course of the internal procedures, it appears that the situation is more serious, the Designated Person will again consider whether a referral should be made.

Should the allegation of abuse concern the DSL the member of staff should inform the Principal and the deputy to the DSL who will act in the place of the DSL. Should the allegation be against the Principal the DSL will immediately inform the LADO and the independent school inspectorate (ISI).

The Principal or the DSL will refer all allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering, or is likely to suffer significant harm, to the local authority designated officer (LADO) within 24 hours. NB, the reporting of safeguarding concerns to statutory agencies does not require parental consent.

Borderline cases will be discussed with the LADO without identifying individuals in the first instance and following discussions the LADO will judge whether or not an allegation or concern meet the relevant threshold. The LADO and the Principal/DSL will decide in the circumstances what further steps should be taken. This could involve informing parents and calling the police.

If the allegation concerns a member of staff, a volunteer or another pupil he/she would normally be informed as soon as possible after the result of any initial investigation authorised or conducted by the LADO is known. Advice will always be sought from the LADO first, however. The college will normally appoint a member of staff to keep the person informed of the likely course of action and the progress of the case.

The outcome of investigation of an allegation will record whether it is substantiated (sufficient evidence either to prove or disprove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to

disprove it) or malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive). If it is established that the allegation is malicious, no details of the allegation will be retained on the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with DfE advice.

If the LADO or any of the statutory child protection authorities decide to take the case further, any staff member concerned may be suspended if this is felt appropriate. The reasons and justification for suspension will be recorded and the staff member informed of them. In the case of staff, the matter will be dealt with in accordance with the Disciplinary Procedure. In the case of pupil-on-pupil abuse which the school has reported to the LADO and which the LADO or statutory child protection authority decides to investigate further, the matter will be dealt with under the College Behaviour and Discipline Policy after discussion with the LADO.

During the course of the investigation the college in consultation with the LADO will decide what information should be given to parents, staff and other pupils and how press enquiries are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 and in Keeping Children Safe in Education relating to reporting restrictions identifying teachers who are the subject of allegations from students.

Any students who are involved will receive appropriate care.

Low-level concerns

The College wishes to foster a culture of openness and safety, and the College's Whistleblowing Procedure reflects this, in accordance with the KCSIE 2022 part 4 recommendations. We aim to create a culture in which all concerns about adults (including where the threshold for an allegation is not met) are shared responsibly and with the right person, and recorded and dealt with appropriately, so that an open and transparent culture is maintained and we can identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working for or with the organisation are clear about professional boundaries and act within them, in accordance with the ethos and values of the organisation. Should any member of staff have any concerns about the behaviour of another member of staff towards a student, he or she should report it at once to the Principal and to the DSL (or to a Vice Principal where the concern relates to the Principal). Any concern will be thoroughly investigated under the College's whistleblowing procedures. Such reporting will be without prejudice to the member of staff's position in the College. Low level concerns about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Where there are allegations of criminal activity, the LADO/MASH team will always be informed, and advice taken, before the College undertakes any investigation of its own. Wherever possible, and subject to the rights of the student, the member of staff will be informed of the outcome of the investigation. No one who reports a genuine concern in good faith needs to fear retribution.

External reporting

We follow Disclosure and Barring Service (DBS) guidance and procedures regarding referrals and barring decisions and the Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. Separate to involvement of the LADO, schools have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) at the school or would have been removed had they not left.

Brampton College will make such a referral as soon as possible after the resignation or dismissal of any individual (whether employed, contracted, a volunteer or a student) whose services are no longer used because he or she is

considered unsuitable to work with children. This includes dismissal, non-renewal of a fixed term contract, no longer using supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above. Where an allegation relates to a member of supply staff provided by an agency, the agency will be fully involved.

Where the College considers the alleged misconduct to be so serious that it warrants a decision on whether the teacher should be prevented from teaching, it will refer the case to the Teaching Regulation Agency, acting for the Secretary of State, as required by sections 141D and 141E of the Education Act 2002. The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

From October 2015, section 5B of the Female Genital Mutilation Act 2003 will place a statutory duty on teachers along with social workers and healthcare professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases will face disciplinary sanctions. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the College's designated safeguarding lead and involve children's social care as appropriate.

Should historical allegations of child abuse be made against a teacher who is no longer teaching, the College will, in accordance with Keeping Children Safe in Education, report the matter to the police. Similarly, allegations against a teacher who is no longer working at the College will also be referred to the police. All allegations of historical abuse should be referred to the Head or DSL straightaway.

Parents

In general, we believe that parents should be informed about any safeguarding concerns regarding their children. It is important that we are honest and open in our dealings with parents. However, concerns of this nature must be referred to the DSL or the Principal who will decide on the appropriate response. In a very few cases, it may not be right to inform them of our concerns immediately as that action could prejudice any investigation, or place the child at further risk. In such cases, advice will be sought from the LADO.

Promoting Awareness

The College's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the school. We expect all the teaching and administrative staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that students always adhere to the standards of behaviour set out in our Behaviour Policy and in enforcing our anti-bullying policy.

Time is allocated in PSHE to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. Assemblies, PT sessions and PSHE lessons are used to promote tolerance and mutual respect and understanding.

All pupils know that there are adults to whom they can turn to if they are worried, including the school counsellor and their personal tutors. If the college has concerns about a young person there is always a recognised requirement for sensitive communication: the College recognises that children may not feel ready or know how to tell someone they are being abused, and staff members are aware of the need to avoid asking leading questions. In order to encourage trusting relationships between students and staff, the College has many features (such as small classes and first-name

terms between staff and pupils) and a variety of access points in which disclosure can take place. Thus, our support includes the following:

- All students have easy, direct access to the two VPs, the Head of Learning Support, and their Personal Tutors, in person, or via telephone or email enabling them to call for support in private.
- Students have homework diaries which contains guidance on where to turn for advice, including confidential help lines and web addresses for external specialists such as ChildLine, Kidscape, Get Connected and the Samaritans.
- Students can access the College Counsellor directly as well as via a member of staff, and can be supported by the Adolescent Psychotherapist or Educational Psychologist, via the Head of Learning Support.
- We provide classes in PSHE sessions on e-safety, RSE, and leading a healthy life, and ensure that all students understand and adhere to the college's guidelines in this area. Wellbeing education is an integral element of the PT sessions for sixth formers.

Position of trust

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

Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential. Staff should refer to the Staff Code of Conduct and the Staff Handbook, which also includes its Social Media Policy.

Monitoring and evaluation of this policy

The college monitors and evaluates its safeguarding policy and procedures through the following activities:

- Senior leadership team discussion sessions with children and staff
- Student questionnaires
- Frequent scrutiny of attendance data
- Regular analysis of a range of risk assessments
- Regular analysis of appropriate provision for the fulfilment of other safeguarding responsibilities relevant to the Annual reports from the DSL to the Proprietor
- Logs of bullying and/or racist behaviour incidents are reviewed regularly by the senior leadership team
- Regular review of parental concerns and parental questionnaires

- Regular review of the use of pupil-specific leisure rooms and clubs at lunchtime and after college
- Regular review of training offered to staff, including e-safety training.

Appendix:

[Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/299391/D_FE-00337-2014.pdf)

Published: September 2023

Part One of this document will be given to every member of staff as part of their Child Protection Induction training. Staff will be asked to sign a form to say they have read and understood the contents. The DSL will discuss this with new staff.

A Legal Requirement and an ISI Reporting Standard References:

- A. ISI Handbook for the Inspection of Schools, The Regulatory Requirements September 2018 www.isi.net
- B. 'The Early Years Foundation Stage: Statutory Framework September 2014':
[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/299391/D FE-00337-2014.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/299391/D_FE-00337-2014.pdf)
- C. 'Working Together to Safeguard Children', DfE guidance dated March 2018:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf
- D. What to do if you are worried a child is being abused <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>
- E. The definition and signs of child abuse (<http://www.nspcc.org.uk/signsofabuse>)
- F. 'Child Protection in Academies: Setting the Scene', Browne Jacobson Solicitors 2009
- G. 'School Staff as Police Officers'- an ISBA briefing document by Farrer & Co, February 2012
- H. Evidence from the NSPCC Policy Adviser - Safeguarding, Emily Arkell, to Sir Roger Singleton's Review, dated 2 February 2009. (www.nspcc.org.uk)
- I. The National Minimum Standards for Boarding Schools (NMS)
- J. Statutory guidance issued under section 29 of the Counter-Terrorism and Security Act 2015

Policies need to be developed from the core themes of:

- Safeguarding
- Promoting welfare

All of them should be reviewed at least annually by the proprietor [at a meeting in which detailed formal report is recorded and held on file (as there is no governing body)]. The ISI handbook states (Part 3, para 107):

"A review of the school's child protection policies must take place at least annually, including an update and review of procedures and their implementation. KCSIE indicates that the DSL should work with the proprietors on this. Proprietors should also ensure that the school contributes to interagency working in line with WT through effective implementation"


of the child protection policy and procedures and effective communication and good cooperation with local agencies. The implementation of these policy provisions will be checked through discussion with proprietors and the Designated Safeguarding Lead (DSL), and by scrutiny of the relevant board minutes and available evidence underpinning the review (e.g. any written report or information presented to governors to support the review, training records, referral information in respect of requests for help and support for individual children, issues and themes which may have emerged in the school and how these have been handled, contribution the school is making to multi-agency working in individual cases or local discussions on safeguarding matters). Minutes should therefore be sufficiently detailed to demonstrate both breadth and depth of the review. "

Related safeguarding policies

- Anti-Bullying Policy
- Induction of New Staff in Child Protection
- Missing Child Policy
- Recruitment Policy
- Taking, Storing and Using Images of Children Policy, Use of ICT, Mobile Phones and Other Electronic Devices Policy
- Whistleblowing Policy
- Staff Code of Conduct
- Educational Visits Policy
- Health and Safety Policy

Authority and circulation

This policy has been authorised and signed by the Principal of Brampton College. Its status is advisory. It is addressed to prospective parents and students and to all members of the teaching and administration staff. This policy is available in the Staff Handbook and on the College's website.

Authorised by:	John Wilson (Principal – Brampton College)
Signed:	
Date:	2 Sept 2023