



CHELTENHAM
LADIES'
COLLEGE

SAFEGUARDING (CHILD PROTECTION) POLICY

Cheltenham Ladies' College's Designated Safeguarding Lead (DSL) is Richard Dodds, Vice Principal (VP).

Richard Dodds can be contacted at doddsr@cheltladiescollege.org Tel: 01242 707004 or ext 2256 or 07538129293

The Deputy Designated Safeguarding Lead (DDSL) is Caroline Ralph, Head of Pastoral Care (HPC).

Caroline Ralph can be contacted at ralphcj@cheltladiescollege.org Tel: 01242 707013 or ext 2260

The Council member (governor) with a particular responsibility for safeguarding is Gerard Evans, who can be contacted directly via EvansGJD@cheltladiescollege.org or via the Clerk to Council office **Tel: 01242 690445 or ext 2401**

The Safeguarding (Child Protection) Policy should be considered in conjunction with the policies referred to in this document and additional policies which include:

- Alcohol, Drugs and Smoking Policy for Pupils
- Anti-bullying and Anti-cyberbullying Policy
- Attendance and Registration Policy
- Behaviour, Discipline and Rewards Policy
- Educational Visits Policy
- Equal Opportunities Policy
- ICT Acceptable Use Policy for Pupils
- Induction Policy for All Staff
- Medical Policy
- Missing Child Policy
- Physical Interventions and Positive Handling Policy
- Relationships between Staff and Pupils
- Search and Confiscation Policy for Pupils
- Staff Code of Conduct
- Visitors and Volunteers' Procedure
- Whistleblowing Policy

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LEGISLATION AND GUIDANCE

At College, as in all other schools in the UK, we work within a legislative framework that seeks to safeguard and promote the welfare of all children. This policy has been developed in accordance with the principles established in the following:

- Children Acts 1989 and 2004
- Education Act 2002
- DfE Guidance 'Working Together to Safeguard Children' (July 2018) (WTSC)
- 'Keeping Children Safe in Education' (September 2018) (KCSIE)
- Disqualification under the Childcare Act 2006
- Prevent Duty for England and Wales (March 2015)
- UK Guidance for Child Internet Safety (August 2016) (UKCCIS)
- Local procedures outlined by the Gloucestershire Safeguarding Children Board (GSCB)

AIMS

The intention of this policy is the creation of a culture of openness throughout the College where all members of the community feel able to express their concerns and anxieties without fear of retaliation or humiliation and have confidence that they will receive a serious, sensitive and professional response from those in positions of responsibility. Specifically, the aims of the policy are:

- To provide an environment in which children and young people feel safe, secure, valued and respected, confident and know how to approach adults if they are in difficulties
- To develop the awareness of Council, teaching staff, non-teaching staff and volunteers of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse to ensure that any concerns are addressed at the earliest possible stage. The term 'staff' used in this policy includes any volunteers; volunteers have the same safeguarding obligations as teaching and non-teaching staff
- To acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding pupils
- To develop a structured procedure within College which will be followed by all members of the College community in cases of suspected abuse
- To develop effective working relationships with all other agencies involved in safeguarding children
- To ensure that all adults within College who have access to children have been checked as to their suitability
- To provide a process by which allegations of abuse against members of staff, including the Principal, or volunteers will be handled
- To provide a framework to underpin Council's annual review of child protection policy & procedures and the efficiency with which related duties have been discharged

We recognise that because of the day to day contact with children, College staff are ideally placed to observe the outward signs of abuse. All staff in College will therefore:

- Establish and maintain an environment where children feel secure, are listened to and feel encouraged to talk
- Be aware of the systems and processes in College which support safeguarding and ensure that children know that there are adults in the College who they can approach if worried

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- Ensure that any deficiency or weakness in child protection arrangements will be remedied without delay
- Be aware of the local early help process and understand their role in it
- Be aware of the process of making referrals to children’s social care and for statutory assessments under the Children Act 1989 that may follow a referral along with the role they might play in such assessments
- Be clear that it is the Designated Safeguarding Lead who has the lead responsibility for child protection and safeguarding. The DSL (and Deputy) is most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

PUPILS’ AND PARENTS’ AWARENESS

- Opportunities exist in the Wellbeing programme, through PSHE topics (and other areas of the curriculum if appropriate), in the houses and in tutor groups for pupils to develop an understanding of what constitutes acceptable or unacceptable behaviour on the part of others and to develop their own self-confidence and assertiveness. This includes explanation of the legal position regarding the age of consent and abuse of trust
- They are informed about this policy and about sources of help and advice in College, including the Counselling Service and the Medical Centre as well as Social Services and agencies such as Childline and the NSPCC
- Prefects and the pupils in the Daisy group are made aware this policy as part of their training
- This policy is available on the Parent Portal and external website. More generally, College establishes open and professional communication with parents in which the safety and wellbeing of all pupils is a clear priority

STAFF RECRUITMENT, EMPLOYMENT AND TRAINING

- College believes that the first step to safeguarding all pupils is to appoint staff who share its commitment to their welfare and to screen out unsuitable applicants through rigorous recruitment procedures, in line with the Independent Schools’ Inspectorate and National Minimum Boarding Standards regulations. They also have regard to current expert advice (eg NCSL) on advertising, scrutiny of applications, interviewing, references, personal documentation, DBS checks etc. The HR Director and other key staff involved in employing staff are trained in these procedures
- During the recruitment process at least one of the person who conducts an interview will have completed safer recruitment training and conduct a safeguarding interview
- All staff sign a code of conduct on joining College which sets out the conduct expected and major policies are explained
- All staff receive safeguarding training as part of their induction. All staff are trained by the DSL on our Safeguarding (Child Protection) Policy and Procedures; including KCSIE part one, and where appropriate Annex A of KCSIE. In addition, staff are trained on further policies during their induction including;
 - Behaviour, Discipline and Rewards Policy
 - The Staff Code of Conduct Policy
 - Whistleblowing Policy
 - Relationship between Adults and Pupils Guidelines

SAFEGUARDING (CHILD PROTECTION) POLICY continued

- Staff attention is also drawn to the safeguarding response to children who go missing from education and the role of the DSL (and Deputy) in College
- All staff are required to complete an online training module on KCSIE and Staff Code of Conduct

The DSL will conduct an annual update to all staff at the beginning of each Autumn Term; any other necessary updates will take place during the course of the year as required. Full refresher training will take place on a three-yearly basis or more frequent if required by GSCB. The DSL and Deputy DSLs will attend suitable training in child protection and inter-agency working every two years.

- The Principal and Nominated Safeguarding Council Member (NSCM) will also undergo appropriate child protection training and updates; this will involve refresher training every two years. The job description for the NSCM is available as Annex 5 of this policy
- Staff are encouraged to pay attention to safeguarding issues in all areas of College life, for instance but by no means exclusively, risk assessments for trips, planning of staff accommodation in boarding houses, exeat arrangements, organisation of external events and so on
- Any concerns about a member of staff's behaviour towards a pupil or pupils will be dealt with under the College Staff Disciplinary Procedure, having particular regard to expert advice on child protection issues involving staff and to the legal obligation to report any possible offences

PROCEDURES

Our College procedures for safeguarding children will be in line with Gloucestershire's Safeguarding Children Board (GSCB), "Working Together to Safeguard Children" and "Keeping Children Safe in Education".

We will ensure that:

- There is also a designated member of Council who takes responsibility for independent scrutiny and challenges of the College's safeguarding policies and practice. The NSCM responsible for child protection will meet termly with the DSL to discuss any CP issues and reports to meetings of Council, reviewing this policy fully for approval once a year
- The Council undertakes an annual review of College policies and procedures relating to child protection, and of the efficiency with which the related duties have been discharged
- In addition to this independent scrutiny, the College Leadership Team regularly review whether policy and practice in safeguarding are effective and compliant with current legislation
- All staff have read and understood Part One of KCSIE. In addition, staff who directly engage with pupils will also be expected to have read and understood Annex A from KCSIE
- The designated person responsible for child protection matters is currently the Vice Principal who is the Designated Safeguarding Lead for Cheltenham Ladies' College. He has appropriate training in child protection issues. All concerns should be passed to the DSL in the first instance. In the absence of the DSL concerns should be passed to the Head of Pastoral Care who is the Deputy DSL and also has appropriate training
- All staff and designated members of Council have received training in how to respond to a pupil who discloses abuse, and the procedure to be followed in appropriately sharing a concern of possible abuse or a disclosure of abuse. (Annex 1)

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- All parents / carers are made aware of the College's responsibilities in regard to child protection procedures through publication of the College's Child Protection Policy on the Cheltenham Ladies' College website. A paper copy will be sent on request.
- We are aware that it is a criminal offence to allow a person barred from working with children to work at Cheltenham Ladies' College. Our Safer Recruitment Policy sets out our procedures for carrying out checks on staff suitability, including DBS checks, barred lists checks and prohibition checks together with references and interview information as recommended by the Local Authority and Independent Schools Standards Regulations, 'Keeping Children Safe in Education' guidance, and in accordance with current legislation
- The name and contact details of the Designated Safeguarding Lead is clearly shown in the staff rooms, and houses in College
- The high importance of safeguarding and child protection requires immediate attention to be given to any deficiencies or weaknesses identified in College procedures, and College will remedy these without delay. Our procedures will be reviewed and updated annually or more frequently if necessary
- The Principal should be made aware of all allegations against members of staff when they are reported including if the person suspected of abuse is the "designated person" (ie the DSL). If the person suspected of abuse is the Principal, the allegation must be reported directly to Chair of Council and immediately referred to the designated officer (LADO) at the local authority. The person suspected of abuse would not be notified that suspected abuse had been reported; this includes the Principal were an allegation to be made against her. No investigation will be carried out until after the discussion with the designated officer (LADO) has taken place
- The safety of the child is paramount and if a member of staff were ever to feel that their reported concerns had not been taken sufficiently seriously they should contact Social Services directly. In line with the College policy on whistleblowing, any member of staff taking such action would not be penalised

Staff and volunteers should also feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding regime. These appropriate whistleblowing procedures are suitably reflected in the staff training and the Whistleblowing Policy so that staff may take their concerns to the College's leadership team. If a member of staff feels unable to raise the issue with the leadership team, or that their concerns are not being addressed, the member of staff should contact the Designated Officer (LADO) when appropriate to do so in accordance with Keeping Children Safe in Education.

- College obtains assurance that child protection checks and procedures apply to any staff employed by another organisation and working with College's pupils on another site
- The Local Safeguarding Children Board (GSCB) establishes the procedures to be followed if concerns are raised about a child; College will follow these procedures. We will work closely with Social Services and the Police as required, for example by attending case conferences, and will keep appropriate, confidential and secure records of any concerns, even if a referral is not necessary. If a pupil on the Child Protection Register is absent for more than two days or leaves College, her social worker will be informed by the DSL. If any pupil under the age for compulsory school attendance leaves College, this will be reported to the relevant local authority, along with her destination, if known.

RESPONSIBILITIES – STAFF

Supporting Pupils in College

College's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All 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 College. We expect all 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 have an important role in insisting that pupils always adhere to the standards of behaviour set out in our Behaviour Discipline and Rewards Policy and in enforcing our Anti-Bullying and Anti-Cyberbullying Policy.

Time is allocated in Wellbeing to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. College Prayers and RS lessons are used to promote tolerance and mutual respect and understanding.

Child in Need

A Child in Need refers to a pupil whose circumstances may require them to have extra support in order for them to live a life which does not compromise their ability to fulfil their potential. These pupils will benefit from 'early help' and support should be put in place as soon as a problem is identified. The College will refer to external agencies such as CYPS (Children and Young Peoples Services) (Nationally; CAMHS) and our Early Help Co-ordinator at Gloucestershire's Children's Social Services for advice and support. Any child may benefit from early help, but all 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
- 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 should be prepared to identify any pupil that is a 'Child in Need' and will benefit from 'early help'; providing support for a child as soon as a problem emerges. In the first instance staff should discuss early help requirements with the DSL.

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

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Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. The College Equal Opportunity Policy ensures these pupils are supported and treated equally.

Child at Risk

A Child at Risk is a pupil who is at risk of significant harm (which may or may not be abuse) and any child in immediate danger or risk of harm will be referred to Social Services and / or the Police immediately in accordance with the procedures outlined in this policy. The DSL will usually make referrals but staff are aware that any member of staff can make a referral although the DSL should be informed as soon as possible that a referral has been made.

Staff will be informed about individual child protection issues on a need-to-know basis. We will endeavour to achieve the best balance between the desires for confidentiality on the part of the child and the need to give members of staff sufficient information for them to fulfil their role responsibly.

Staff members are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should act immediately and in the best interests of the child. Staff understand their responsibility to safeguard children and will share any concerns they may have about a child with the appropriate staff. If staff have a concern, they must act and speak to the DSL (or Deputy) to agree a course of action. The DSL will then act in accordance with the GSCB thresholds. Actions could include:

- Managing any support for the child internally via College's own pastoral support processes
- An early help assessment
- A referral to social services, for example as the child might be in need, is in need or suffering or likely to suffer harm

RESPONSIBILITIES – DESIGNATED SAFEGUARDING LEAD (DSL AND DEPUTY DSL)

- Referring a child, if there are concerns about a child's welfare, possible abuse or neglect, to the local authority's Children's Social Services (GCSB) as soon as is reasonably practical (within 24 hours). This may take place without informing parents / guardians where appropriate. Where an allegation is made against a member of staff, it is the Principal who will contact the Designated Officer (LADO)
- Referring cases to the Channel programme where there is a radicalisation concern
- Supporting staff who make a referral to GCSB or to the Channel programme
- Supporting staff in providing a child with early help
- Referring all cases of where a person has been dismissed or left due to the risk / harm to a child to the DBS
- Referring all cases where a crime has been committed to the Police as required
- Referring any 'serious' cases to the Charities Commission
- Ensuring that all records are kept confidentially, securely and separate from pupil records
- Acting as a focal point for staff concerns and liaising with other agencies and professionals
- Acting as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies

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- Ensuring that either they or another appropriately informed member of staff attends case conferences, family support meetings, core groups, or other multi-agency planning meetings, contributes to the Framework for Assessments process and provides a report which has been shared with parents
- Ensuring that any absence of two days, without satisfactory explanation, of a pupil currently on the Child Protection Register, is referred to their Education Welfare Officer and / or Social Worker
- Liaising with the Principal to inform her of issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and Police investigations
- Ensuring that all College staff are aware of College's Child Protection Policy and Procedures and know how to recognise and refer any concerns
- Ensuring that the Child Protection Policy is reviewed annually, or more often if necessary, and the procedures and implementation are updated and reviewed regularly, and work with the governing body regarding this
- Ensuring that the Child Protection Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of College in this
- Ensuring that College links with the local GSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Ensuring that when children leave College that their child protection file is copied for any new school or college as soon as possible but transferred securely and separately from the main pupil file. In accordance with DfE guidance, a confirmation receipt will be requested
- Understands the unique risks associated with online safety and has the relevant knowledge and up to date capability required to keep children safe whilst they are online in College;
- Taking responsibility, along with other members of the Leadership Team, for the Missing Child Policy which deals with children going missing from the College

The designated member of Council gives an annual update to Council. In addition, each term the DSL will report any current child protection issues to the designated member of Council.

The DSL keeps up to date with knowledge to enable him to fulfil his role, including attending relevant training, at least every two years, provided by Gloucestershire's Safeguarding Children Board, the Safeguarding in Education Team or a similar provider.

We recognise that children cannot be expected to raise concerns in an environment where members of staff fail to do so. All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues. Any staff member can refer their concerns to Children's Social Care directly. Our child protection training gives advice on how our staff can establish a safe working environment for the children, hence reducing the risk of staff being falsely accused of unprofessional conduct, which may have a bearing on child protection.

MANAGING RISKS OF SELF-HARM

Safeguarding children may mean protecting them from self-inflicted harm. A pupil who self-harms may not be at serious risk but will still need support. However, it is important that those caring for the pupil are aware of dark thoughts, depression, anxiety and any self-harm or suicidal thoughts, in order to provide proper support, monitoring and protection. Accordingly, any member of staff who becomes aware that a pupil is harming herself or is thinking of doing so should inform both her Housemistress and the Lead Nurse. They will then determine what, if

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any, further action should be taken. Guidelines exist within the Medical Policy on how the risks of self-harm are managed.

ACTION TO BE TAKEN BY STAFF WHERE THERE ARE CONCERNS ABOUT A CHILD

Possible indicators of abuse and other safeguarding concerns are covered in child protection training, subsequent refresher sessions and updates.

There are four main categories of abuse: physical, sexual, emotional abuse and neglect. All of these can happen at home, at College, or elsewhere, inflicted by adult on child or by child on child. The signs and indicators of abuse or neglect are detailed in later in this policy.

Members of staff involved with a pupil should aim for a relationship which engenders trust. They should also be prepared to listen and to be observant and sensitive to changes in attitude and wellbeing. Incidents of social and emotional abuse can often be resolved using the stages set out in the pastoral section of the Staff Handbook. Pupils may also refer themselves to the College counselling service and should be reminded of this confidential source of help. (Please see also Anti-bullying and Anti-cyberbullying Policy and Behaviour, Discipline and Rewards Policy.)

If any member of staff suspects that a pupil has been abused, the circumstances should be reported, in writing or orally with a follow-up written report, to the DSL, who is the “designated person”, immediately. Allegations of abuse must also be reported. The DSL will follow the guidelines published by the Gloucestershire Safeguarding Children Board on their website, but is duty bound to report cases of suspected abuse or disclosures of abuse to Children’s Social Care within 24 hours. The Principal and Nominated Council Member will also be informed by the DSL.

If a pupil confides in a member of staff that she has been abused, the member of staff should follow the procedure for managing such disclosures that would have been outlined during their training. (Annex 1). The pupil should be allowed to talk without any suggestion that judgement is being passed. She should not be questioned in any depth as this could compromise a subsequent investigation by specially trained social workers or Police. Staff should not promise unconditional confidentiality as it may be necessary to involve these other agencies but the pupil should be reassured that any information passed on will be on a "need-to-know" basis for her own welfare. Members of staff should make written notes immediately after a talk with a pupil in which abuse has been alleged, and sign and date these notes which should be passed to the DSL.

Any cases of historical abuse allegations that are reported to, or come to the attention of the DSL will be reported by the DSL to the Police as appropriate.

PEER ON PEER ABUSE:

Staff recognise that abuse can take place between pupils and this type of abuse can be physical, sexual or emotional abuse. This peer on peer abuse can manifest itself in various ways and is most likely to include, but not limited to:

- Bullying (including cyberbullying)

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- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment
- Sexting (also known as youth produced sexual imagery)
- Initiation / hazing type violence and rituals

Any peer abuse will not be tolerated; abuse is abuse and must not be passed off as ‘banter’ or part of growing up’. Perpetrators will be dealt with in accordance with our Behaviour and Discipline and Rewards Policy and Anti-bullying and Anti-cyberbullying Policy; further information can be found in the ‘Discipline’ section of the College Anti-bullying and Anti-cyberbullying Policy. Any abuse of this nature will also be referred to Gloucestershire Safeguarding Children Board (GCSB).

Any pupil alleged to have abused another may be suspended and asked to return home or to guardians pending an investigation. The arrangements for this will depend upon the circumstances of the individual in question at the time of investigation. Disciplinary measures may be taken even if there is insufficient evidence for a prosecution.

As a full boarding school staff are particularly alert to safeguarding pupils against the potential for peer abuse. Children may be particularly vulnerable in residential settings. In reflection of that, there are additional requirements for boarding schools and these are set out in National Minimum Standards for Boarding Schools which can be found at www.gov.uk.

CHILD ON CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Pre-planning, effective training and effective policies will provide College with the foundation for a calm, considered and appropriate response to any reports. Reports of sexual violence or sexual harassment should be made immediately to the DSL (or Deputy).

Any decisions are for College to make on a case-by-case basis, with the DSL (or Deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children’s social care and the Police as required.

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

The risk and needs assessment should consider:

- The victim, especially their protection and support
- The alleged perpetrator
- All the other children (and, if appropriate, adult students and staff) at College, especially any actions that are appropriate to protect them

The DSL (or Deputy) should ensure they are engaging with children’s social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be

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required. Further detail on how College will respond to reports of child on child sexual violence and sexual harassment can be found in Annex 2 of this policy.

CONTEXTUALISED SAFEGUARDING

Safeguarding incidents and / or behaviours can be associated with factors outside College and / or can occur between children outside College. All staff, but especially the DSL (or Deputy) should be considering the context within which such incidents and / or behaviours occur. This is contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and / or welfare. Children's social care assessments should consider such factors so it is important that College provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

ONLINE SAFETY

Our ICT Acceptable Use Policies for pupils and staff recognise that internet safety is a whole College responsibility (staff, pupils, parents). Children and young people may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. College has also suitable filtering and monitoring systems in place to protect our pupils from inappropriate sites from being accessed via the College network; these are not 'over blocking' of sites and so do not lead to unreasonable restrictions. We also acknowledge that most pupils have their own portable devices which enable them free access to the internet using their own network.

We therefore recognise our responsibility to educate our pupils, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies.

Every pupil will receive safeguarding guidance on online safety through:

- The Wellbeing and PSHE programmes within College
- The peer mentoring system – 'Cybirds' – with two pupils appointed per junior house who provide help and advice to younger pupils as well as working with the Housemistress to give House based training. The Cybirds have annual training with a representative from CEOP or police liaison office
- Housemistress-led in-house training
- Friday wellbeing or Saturday morning enrichment sessions are planned and led by Cybirds, focusing on all forms of cyber safety, particularly the use / abuse of social networking sites and the dangers of 'sexting'
- Wellbeing or Saturday morning talks for both pupils and parents on e-safety and presentations at parents' meetings

SEXTING

'Sexting' among children and young people can be a common occurrence; where they often describe these incidents as 'mundane'. Children, involved in sexting incidents, will be dealt with

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(by the Police) as victims as opposed to perpetrators (unless there are aggravating circumstances). Any 'sexting' incident that takes place within College will be recorded together with any actions that are taken. When considering the actions that are to be taken, the following should be considered:

- Any significant age difference between the sender and receiver
- Any external coercion or encouragement
- Whether the image is of a severe or extreme nature
- Whether the image has been more widely distributed
- Whether any knowledge of the sender / recipient may add cause for concern

The incident will be handled in accordance with the UK Council for Child and Internet Safety (UKCCIS) guidance which is available in Annex 3 of this policy. The incident will be referred using normal safeguarding procedures if appropriate.

ALLEGATIONS OF ABUSE AGAINST A MEMBER OF STAFF

Where a member of staff is suspected of abuse, the College owes a duty of care both to the alleged victim and the employee, and must handle any allegation of abuse in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

Allegations that a member of staff or a volunteer has abused a pupil or pupils either inside College premises or during a College trip or visit could be made by:

- Parents
- The abused pupil
- Other members of staff
- Other pupils
- The Police or Social Services
- A third party

We understand that a pupil may make an allegation against a member of staff or volunteer. If such an allegation is made, the member of staff receiving the allegation will immediately inform the Principal. The Principal (or Nominated Safeguarding Council Member) shall discuss the allegations against the staff member with the LADO immediately (within 24 hours) and also inform the DSL, unless the DSL is the focus of the allegation.

If the allegation made concerns the Principal, the person receiving the allegation will immediately inform the Chairman of Council who will consult as above, without notifying the Principal first.

If parents do not already know of an allegation, they will be told as soon as possible. However, where outside agencies such as Police or Social Services are involved, disclosure will only be made when and to the extent indicated by those agencies. Parents will be kept informed of the progress of the case and the outcome (but not the content) of any disciplinary proceedings. Parents will need to be made aware of the prohibition on reporting or publishing allegations about teachers in section 141F of the Education Act 2002. If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

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College has a statutory duty to make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. There are reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation).

A member of staff may be suspended from duty while a proper investigation is carried out, but College is required to suspend only as a last resort and all options to avoid suspension must be considered before taking that step. Alternative measures (eg redeployment, or providing an assistant to accompany the member of staff) may provide the same result as suspension and should be implemented wherever possible. In the case where the member of staff accused is a resident member of boarding staff, they may be required to live away from their term-time accommodation whilst an investigation is carried out. The arrangements for this will depend upon the circumstances of the individual in question at the time of investigation. Disciplinary measures may be taken even if there is insufficient evidence for a prosecution. All unnecessary delays will be eradicated in dealing with allegations against staff.

CONCERNS ABOUT SAFEGUARDING PROCEDURES WITHIN THE COLLEGE

The safeguarding of pupils is the responsibility of all staff employed. Therefore, all staff and volunteers should feel able to raise concerns about poor practice or any concerns in the College's safeguarding regime. Any such concerns will be taken very seriously by the College leadership team. Appropriate whistleblowing procedures are in place and outlined in the College's Whistleblowing Policy.

Where a member of staff feels unable to raise an issue within College or feels that their genuine concerns are not being addressed other whistleblowing channels are open to them such as the NSPCC whistleblowing helpline. (help@nspcc.org.uk or call 0800 028 0285).

REPORTING OBLIGATIONS

Where a person leaves the employment of College, or ceases to offer services to the College, after an allegation of abuse is substantiated, the DSL will consult with the LADO as to whether to refer the case to the Disclosure and Barring Service (DBS) or to the Teaching Regulation Agency (TRA).

Disclosure & Barring Service (DBS)

If College dismisses or ceases to use the services of a member of staff or volunteer in circumstances where there is risk of harm or actual harm to children then a referral to the Disclosure and Barring Service will be made as soon as possible. If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services to College at a time when child protection concerns exist in relation to that person, those concerns will still be investigated in full and a referral will be made to the Disclosure and Barring Service as soon as possible if the criteria for a referral are met.

Teaching Regulation Agency (TRA)

Where a teacher has been dismissed, or would be likely to have been dismissed had he / she not resigned, separate consideration will be given as to whether a referral to the Teaching

SAFEGUARDING (CHILD PROTECTION) POLICY continued

Regulation Agency (TRA) should be made, taking into account whether the circumstances are such that a prohibition order may be appropriate.

Where an allegation is made against a member of staff or volunteer, and a person in the regulated activity has been dismissed or removed due to safeguarding concerns, (or would have been had they not resigned); a prohibition order may be appropriate. The reasons such an order would be considered are: “unacceptable professional conduct”, “conduct that may bring the profession into disrepute” or a “conviction, at any time, for a relevant offence”.

If an allegation is shown to be deliberately invented or malicious, the Principal will consider whether any disciplinary action is appropriate against the pupil who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible, even if he or she was not a pupil. In September 2010 the Crown Prosecution Service published guidance for the Police on harassment under the Protection from Harassment Act 1997.

If abuse is alleged or occurs, the normal channel of communication is through the DSL to the relevant Social Services Departments. The Children Act 1989 and 2004 requires an additional channel for serious complaints or concerns should the normal channel be blocked. Concerns or allegations about College practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm can also be referred directly to Gloucestershire Safeguarding Children Board 01452 426565.

Charity Commission

College will report any ‘Serious Incident’ to the Charity Commission; a case of abuse involving a member of staff would therefore be reported.

Parents, staff and children can talk to the Gloucestershire Safeguarding Children Board, Childline or the NSPCC.

The names and telephone numbers of contacts are:

Gloucestershire Safeguarding Children Board (GSCB), www.gscb.org.uk Front Door For Children’s Services 01452 426565 (option 1)	Childline: 0800 1111 www.childline.org.uk
Local Area Designated Officer (LADO) Nigel Hatten 01452 426994 gscb@gloucestershire.gov.uk	NSPCC: 0808 800 5000 www.nspcc.org.uk
Early Help Co-ordinator Jubaida Rashid 01452 328160 cheltenhamearlyhelp@gloucestershire.gov.uk	
Cheltenham and Tewksbury Referral and Assessment Team 01242 532447	

CHILDREN MISSING FROM EDUCATION

A child going missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect including that a child may be at risk of radicalisation, FGM or forced marriage. Unauthorised absences from College will be managed in accordance with the College's Registration and Attendance Policy. College will monitor all pupil absences from College and promptly address concerns about irregular attendance with the parent / carer. Where reasonably possible more than one emergency contact number will be held on each pupil on our MIS (iSAMS). This will give us additional options when contacting the family over any concerns.

A pupil who fails to attend College regularly or has been absent from College without the College's permission for a continuous period of 10 school days or more will be reported to the local authority. In addition, College will inform the local authority of any pupil removed from the admissions register where:

- Parents have notified College that the pupil is going to be educated outside the College system
- A day pupil is still registered but has ceased to attend College and no longer lives within a reasonable distance of College
- The pupil has been certified by the Lead Nurse that they are unlikely to be in a fit state of health to attend College
- The pupil is in custody for a period of more than four months
- The pupil has been permanently excluded

College will comply with its reporting duties to the local authority in accordance with the England (Pupil Registration) Regulations 2006 and the Children Missing Education Guidance 2016. This includes notifying the local authority if a pupil is removed or added to the admissions register at a non-standard transition under in accordance with the regulations.

ENROLMENT AND ADMISSIONS REGISTER

Once a place has been formally accepted, a pupil's name will be entered onto the admission register held within the College database from the beginning of the first day on which it has been agreed that she will attend. Details held on the College database are in accordance with 'Children missing education' statutory guidance September 2016, Reference: DFE-00214-2016.

College is required to inform the local authority when we remove or add a pupil's name to the admissions register at a non-standard transition point (eg mid-term).

TRANSFER OF CHILD PROTECTION FILES

Where children leave College, the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, ensuring secure transit, and confirmation of receipt should be obtained. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

SAFEGUARDING ISSUES

Types of Abuse or Neglect

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 (eg via the internet). They may be abused by an adult or adults or another child or children. All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Indicators of Abuse

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.

Signs that MAY INDICATE physical abuse include:

- Injuries that are not consistent with the explanation offered
- Injuries not consistent with the child's age and development
- Repeated injuries over a period of time
- Runaway attempts and fear of going home
- Stilted conversation, vacant stares or no attempt to seek comfort when hurt describes self as bad and deserving to be punished
- Cannot recall how injuries occurred or offers an inconsistent explanation
- Wary of adults or reluctant to go home
- Often absent from College
- May flinch if touched unexpectedly
- Extremely aggressive or withdrawn
- Displays indiscriminate affection-seeking behaviour
- Abusive behaviour and language in play
- Overly compliant and / or eager to please
- Poor sleeping patterns, fear of the dark, frequent nightmares
- Sad, cries frequently
- Depression
- Poor memory and concentration

Neglect

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

Signs that MAY INDICATE neglect include:

- Unattended medical and dental needs
- Consistent lack of supervision
- Consistent hunger
- Nutritional deficiencies
- Inappropriate dress for weather conditions
- Poor hygiene
- Persistent (untreated) conditions (eg head lice or other skin disorders)
- Developmental delays (eg language, weight)
- Irregular or non-attendance at College
- Demands constant attention and affection
- Lack of parental participation and interest
- Regularly displays fatigue or listlessness, falls asleep in class
- Frequently absent or late
- Lacks trust in others, unpredictable

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.

Signs that MAY INDICATE emotional abuse include:

- Bedwetting and / or diarrhoea
- Frequent psychosomatic complaints, headaches, nausea, abdominal pains
- Mental or emotional development lags
- Behaviours inappropriate for age
- Fear of failure, overly high standards, reluctance to play
- Fears consequences of actions, often leading to lying
- Extreme withdrawal or aggressiveness, mood swings
- Overly compliant, too well-mannered
- Excessive neatness and cleanliness
- Extreme attention-seeking behaviours
- Poor peer relationships
- Severe depression, may be suicidal
- Runaway attempts
- Violence is a subject for art or writing
- Complains of social isolation

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.

Signs that MAY INDICATE sexual abuse include:

- Forbidden contact with other children
- Fatigue due to sleep disturbances
- Sudden weight change
- Cuts or sores made by the child on the arm (self-mutilation)
- Recurring physical ailments
- Difficulty in walking or sitting
- Unusual or excessive itching in the genital or anal area due to infection(s)
- Torn, stained or bloody underwear
- Injuries to the mouth, genital or anal areas (eg bruising, swelling, sores, infection)
- Sudden lack of interest in friends or activities
- Fearful or startled response to touching
- Overwhelming interest in sexual activities
- Hostility toward authority figures
- Need for constant companionship
- Regressive communication patterns (eg speaking childishly)
- Academic difficulties or performance suddenly deteriorates
- Truancy and / or running away from home
- Wears provocative clothing or wears layers of clothing to hide bruises

Specific Safeguarding Issues

In addition to identifying the types of abuse and neglect listed staff also need to be aware of specific safeguarding issues, be able to recognise indicative signs and pass on any concerns to the DSL.

Child Sexual Exploitation (CSE)

CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Signs that MAY INDICATE CSE include:

- Inappropriate sexual or sexualised behaviour
- Sexually risky behaviour, 'swapping' sex
- Repeat sexually transmitted infections
- In girls, repeat pregnancy, abortions, miscarriage
- Receiving unexplained gifts or gifts from unknown sources
- Having multiple mobile phones and worrying about losing contact via mobile
- Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- Changes in the way they dress
- Going to hotels or other unusual locations to meet friends
- Seen at known places of concern
- Getting in / out of different cars driven by unknown adults
- Having older boyfriends or girlfriends
- Involved in abusive relationships, intimidated and fearful of certain people or situations
- Associating with other young people involved in sexual exploitation
- Recruiting other young people to exploitative situations
- Truancy, exclusion, disengagement with College, opting out of education altogether
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- Mood swings, volatile behaviour, emotional distress
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- Drug or alcohol misuse
- Getting involved in crime
- Police involvement, Police records
- Injuries from physical assault, physical restraint, sexual assault

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 involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

Honour-Based Violence (HBV)

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and / or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

If staff have a concern regarding a child that might be at risk of HBV they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and children's Social Care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach as outlined below.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is internationally recognised as a violation of human rights of girls and young women. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Whilst all staff should speak to the DSL immediately with any concerns about FGM, there is a specific legal duty on teachers. 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 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, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

A teacher 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 also consider and discuss any such case with College or College’s designated safeguarding lead. The member of staff should call Gloucestershire Police on 101 or if there is an immediate risk to life or serious harm 999. The duty does not apply in relation to at risk or suspected cases (ie where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

For teachers, College will need to consider any failure to comply with the duty in accordance with their staff disciplinary procedures. Where College determines it is appropriate to dismiss the teacher as a result of the failure to comply, or the teacher would have been dismissed had they not resigned, College must consider whether to refer the matter to the Teaching Regulation Agency (TRA) in England.

Circumstances and occurrences that may point to FGM happening:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child’s family being from one of the ‘at risk’ communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemen, Afghanistan, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child’s sibling has undergone FGM
- Child talks about going abroad to be ‘cut’ or to prepare for marriage

Signs that may indicate a child has undergone FGM:

- Prolonged absence from College and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Disclosure

Forced Marriage:

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

Young people, especially girls who are forced to marry, or those who fear they may be forced to marry, are frequently withdrawn from education, restricting their educational and personal development. They may feel unable to go against the wishes of their parents and consequently may suffer emotionally, often leading to depression and self-harm. These factors can contribute to impaired social development, limited career and educational opportunities, financial dependence and lifestyle restrictions.

Staff may become aware of a student because they appear anxious, depressed and emotionally withdrawn with low self-esteem. They may have mental health disorders and display behaviours such as self-harming, self-cutting or anorexia. Often students' symptoms can be exacerbated in the periods leading up to the holiday season. Staff may wish to be particularly vigilant in that period.

College can play an important role in safeguarding children from forced marriage. If a member of staff is concerned for a pupil who is under 18 they should follow the College's normal reporting procedures for a safeguarding concern and contact the DSL. College staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fm@fco.gov.uk.

Radicalisation – Prevent Duty

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty").

Staff are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. Staff need to be able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. College has put in place clear procedures for protecting children at risk of radicalisation.

The Prevent duty builds on existing local partnership arrangements. Effective engagement with parents is also considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. College would discuss any concerns in relation to possible radicalisation with a child's parents in line with the individual College safeguarding policies and procedures unless they have specific reason to believe that to do so would put the child at risk.

The designated safeguarding lead has undertaken Prevent awareness training and has provided training, advice and support to staff on protecting children from the risk of radicalisation.

SAFEGUARDING (CHILD PROTECTION) POLICY continued

Indicators of radicalisation could include:

- Their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause
- Racist graffiti / symbols / comments made in College
- Speaking out or writing in favour of extremist ideas in College work
- Changing their style of dress or personal appearance to accord with the group
- Extreme comments shared on social media
- Distribution of extreme or terrorist propaganda among other pupils
- Association with those known to be involved in extremism (including via the internet)
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- Possession of material or symbols associated with an extremist cause (eg the swastika for far right groups)
- Attempts to recruit others to the group / cause / ideology
- Travel for extended periods of time to international locations known to be associated with extremism

The national Prevent Strategy aims to stop people becoming terrorists or supporting terrorism. Cheltenham Ladies' College, working with other local partners, families and communities, seeks to play a key role in ensuring that the children and young people who attend the College or use its services are safe from the threat of terrorism. Prevent is part of College's wider responsibility for Safeguarding and this policy is therefore linked to College's Policy for Safeguarding and Child Protection.

The Prevent Strategy identifies that young people are more likely to be vulnerable to violent extremist or terrorist narratives, including non-violent extremism which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The Government's Prevent Strategy defines extremism as 'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'.

We believe that Cheltenham Ladies' College should be a safe place where children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of the terrorist ideology, and learn how to challenge such ideas.

In order to fulfil our Prevent Duty, we undertake to do the following:

- Actively promote Fundamental British Values, including mutual respect, tolerance and democratic participation, as part of our wider Wellbeing programme as well as within other curriculum areas and Prayers
- Respect learner and staff diversity, encouraging freedom and openness
- Assess the risk of children in College / settings / activities being drawn in to terrorism
- Maintain robust safeguarding policies which take in to account the policies and procedures set out by GCSB and identify extremism / radicalisation as issues to be reported promptly to the Designated Safeguarding Lead
- Train staff so that they have the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism
- Conduct due diligence checks on groups / individuals seeking to hire or use College premises

SAFEGUARDING (CHILD PROTECTION) POLICY continued

- Conduct due diligence checks on visitors to College, particularly visiting speakers, whether invited by children or staff
- Conduct due diligence checks on contractors working on College sites
- Ensure children are safe from terrorist and extremist material when accessing the internet in College
- Review our policies annually.

College staff are able to make a direct referral to the Channel Programme by contacting our local Channel Police officer and should understand when it is appropriate to do so. They are advised to contact the DSL in the first instance. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for College to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. In addition to information sharing, if a staff member makes a referral to Channel, they may be asked to attend a Channel panel to discuss the individual referred to determine whether support is required.

The Counter-Terrorism and Security Act 2015 places a duty on local authorities to ensure the Channel panels are in place. The panel must include the local authority and chief officer of the local Police. Panels will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, following a referral from the Police and where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. The Act will require partners of Channel panels (such as College) to co-operate with the panel in the carrying out of its functions and with the Police in undertaking the initial assessment as to whether a referral is appropriate. Schools and colleges which are required to have regard to Keeping Children Safe in Education are listed in the Act as partners of the panel.

Other Specific Safeguarding issues

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on the TES website and also on its own website www.nspcc.org.uk. Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website:

- Bullying including cyberbullying
- Child sexual exploitation (CSE) – see also above
- Child on child sexual violence and sexual harassment – see also above
- Children missing from home or care
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM) – see also above
- Forced marriage – see also above
- Gangs and young violence
- Gender-based violence / violence against women and girls (VAWG)
- Hate
- Mental health
- Missing children and adults strategy
- Private fostering
- Radicalisation – see also above

SAFEGUARDING (CHILD PROTECTION) POLICY continued

- Relationship abuse
- ‘Sexting’
- Teenage relationship abuse
- Trafficking

ANNEX 1

PROCEDURE FOR DEALING WITH DISCLOSURES (THE 6 R'S – WHAT TO DO IF):

1. Receive

- Listen to what is being said without displaying shock or disbelief
- Take what is said seriously
- Note down what has been said

2. Reassure

- Reassure the pupil that they have done the right thing in talking to you
- Be honest and do not make promises you cannot keep eg “It will be alright now”
- **Do not promise confidentiality;** you have a duty to refer
- Reassure and alleviate guilt, if the pupil refers to it eg “you’re not to blame”
- Reassure the child that information will only be shared with those who need to know

3. React

- React to the pupil only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details
- **Do not** ask leading questions; “Did he / she....?” Such questions can invalidate evidence
- **Do** ask open questions; “Anything else you want to say?”
- Do not criticise the perpetrator; the pupil may have affection for him / her
- Do not ask the pupil to repeat it all for another member of staff
- Explain what you have to do next and who you have to talk to

4. Record

- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible
- Do not destroy your original notes
- Record the date, time, place, any non-verbal behaviour and the words used by the child. Ensure that as far as possible you have recorded the actual words used by the child
- Record statements and observable things rather than your interpretations or assumptions

5. Remember

- Contact the College DSL immediately
- The DSL may be required to make appropriate records available to GCSB

6. Relax

- Get some support for yourself

ANNEX 2

CHILD ON CHILD SEXUAL VIOLENCE AND SEXUAL HARRASSMENT

What is Sexual Violence and Sexual Harassment?

Sexual Violence

It is important that College staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

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

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so 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.

Actions following a report of sexual violence and / or sexual harassment:

College should carefully consider any report of sexual violence and / or sexual harassment. The DSL (or Deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on College's initial response. Important considerations will include:

The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered:

- The nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour
- The ages of the children involved
- The developmental stages of the children involved
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse
- Are there ongoing risks to the victim, other children, adult students or College staff; and
- Other related issues and wider context

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, College should follow general safeguarding principles as set out throughout this guidance. **Immediate** consideration should be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved / impacted). The starting point regarding any report should always be that sexual violence and sexual harassment is not acceptable and will not be tolerated. Especially important is not to pass off any sexual violence or sexual harassment as 'banter', 'part of growing up' or 'having a laugh'.

Options to Manage the Report

Colleges will consider every report on a case-by-case basis. When to inform the alleged perpetrator will be a decision that should be carefully considered. Where a report is going to be made to children's social care and / or the Police, then, as a general rule, College should speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop the College taking immediate action to safeguard their children, where required. There are four likely scenarios for College to consider when managing any reports of sexual violence and / or sexual harassment. These are:

- Manage Internally
- Early Help
- Referral to Children's social care
- Reporting to the Police (any report to the Police will generally be in parallel with a referral to Children's social care)

Ongoing Response

Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. College should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator. The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the College is a safe space for them.

Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape. Support can include; Children and Young People's Independent Sexual Violence Advisors (ChISVAs) an agency which provides emotional and practical support for victims of sexual violence.

College will have a difficult balancing act to consider in safeguarding and supporting the alleged perpetrator. On one hand they need to safeguard the victim (and the wider pupil / student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions. It is important that if the alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The DSL should take responsibility to ensure this happens as well as transferring the child protection file.

ANNEX 3:

SEXTING IN SCHOOLS AND COLLEGES; UK COUNCIL FOR CHILD AND INTERNET SAFETY (AUGUST 2016); GUIDANCE FOR STAFF

In August 2016 the UK Council for Child Internet Safety (UKCCIS) published non-statutory guidance on managing incidents of sexting by under-18s. The UKCCIS guidance is non-statutory, but should be read alongside KCSIE and it should be followed unless there is a good reason not to do so. There is no clear definition of 'sexting'. The UKCCIS guidance talks about 'youth-produced sexual imagery'. This is imagery that is being created by under 18s themselves and involves still photographs, video, and streaming. In the guidance, this content is described as sexual and not indecent. Indecent is subjective and has no specific definition in UK law.

Incidents Covered by the Guidance:

- Person under 18 creates a sexual image of themselves and shares it with another person under 18
- A person under 18s shares an image of another under 18 with another person under 18 or an adult
- A person under 18 is in possession of sexual imagery created by another person under 18

Incidents Not Covered by the Guidance:

- Under 18s sharing adult pornography
- Under 18s sharing sexual texts without sexual imagery
- Adults sharing sexual imagery of under 18s. (This is child sexual abuse and must always be reported to Police)

Response to Incidents of Youth Produced Sexual Imagery

The response should be guided by the 'principle of proportionality'. The primary concern at all times should be the welfare and protection of the young people involved.

The Law

Making, possessing, and distributing any imagery of someone under 18 which is indecent is illegal. This includes imagery of yourself if you're under 18.

Indecent is not definitively defined in law, but images are likely to be considered indecent if they depict:

- A naked young person
- A topless girl
- An image which displays genitals, and
- Sex acts including masturbation
- Indecent images may also include overtly sexual images of young people in their underwear

These laws were not created to criminalise young people but to protect them. Although sharing sexual images of themselves is illegal and risky, it is often the result of curiosity and exploration. Young people need education, support, and safeguarding, not criminalisation. The National Police Chiefs' Council (NPCC) is clear that "youth-produced sexual imagery should be primarily treated as a safeguarding issue." College may respond to incidents without involving the Police. (However, in some circumstances, the Police must always be involved.)

Crime Recording:

When the Police are notified about youth-produced sexual imagery, they must record this as a crime. The incident is listed as a crime, and the young person is the suspect. This is, however, not the same as a criminal record. Every crime reported to the Police must have an outcome code. The NPCC, Home Office and the DBS have agreed a new outcome code for youth-produced sexual imagery.

Outcome 21:

This outcome code allows the Police discretion not to take further action if it is not in the public interest, even though there is enough evidence to prosecute.

Using this outcome code is likely to mean the offence would not appear on a future Enhanced DBS check, although not impossible, as that disclosure is a risk-based decision.

Handling Incidents:

- Refer to the Designated Safeguarding Lead or Deputy DSL
- DSL meets with the young people involved
- Do not view the image unless it is unavoidable
- Discuss with parents, unless there is an issue where that's not possible
- Any concern the young person is at risk of harm, contact social care or the Police

The DSL will always refer to the Police or Social Care if incident involves:

- An adult
- Coercion, blackmail, or grooming
- Concerns about capacity to consent, (eg SEN)
- Images show atypical sexual behaviour for the child's developmental stage
- Violent acts are depicted
- Image shows sex acts and includes a child under 13
- A young person at risk of immediate harm as a result of the disclosure (for example, self-harm or suicide)

Once the DSL has enough information, the decision should be made to deal with the matter in College, refer it to the Police or to social care. All information and decision-making should be recorded in line with College's policy. If the incident has been dealt with within College, a further review should be held to assess risks.

Assessing the Risks once the Images have been shared:

- Has it been shared with the knowledge of the young person?
- Are adults involved in the sharing?
- Was there pressure to make the image?
- What is the impact on those involved?
- Does the child or children have additional vulnerabilities?
- Has the child taken part in producing sexual imagery before?

Viewing Images:

- Avoid viewing youth-produced sexual imagery. Instead, respond to what you have been told the image contains
- If it is felt necessary to view, discuss with the head teacher first
- Never copy, print, or share the image (it's illegal)

SAFEGUARDING (CHILD PROTECTION) POLICY continued

- View with another member of staff present
- Record the fact that the images were videoed along with reasons and who was present. Sign and date

Deleting Images (from devices and social media)

If College has decided that involving other agencies is not necessary, consideration should be given to deleting the images. It is recommended that pupils are asked to delete the images themselves and confirm they have done so. This should be recorded, signed, and dated. Any refusal to delete the images should be treated seriously, reminding the pupil that possession is unlawful.

ANNEX 4

STAFF CODE OF CONDUCT

Our prime function is to educate the pupils in our care. Everyone employed at College is contributing to this worthwhile and important work in some way. We hope that staff will find their work fulfilling and that they will enjoy being part of College.

We recognise that College is a very busy environment and that each role has its own pressures. We expect that everyone will share the organisational values as set out in the Code of Conduct and Standards of Professional Behaviour and enact them as they work alongside all staff, setting an example to College pupils at all times. College's Code of Conduct and Standards of Professional Behaviour are applicable to all staff at College without exception.

We are committed to:

The Development of People (ourselves, pupils, our staff)

This involves recognising our ability to reflect and learn. This implies a receptive and constructive attitude towards guidance, performance review and opportunities for further professional development as well as recognising and celebrating success. It also implies a commitment on the part of College to invest in honing the skills of its leaders and managers to lead and manage people in a capable and enlightened way.

Showing Respect for One Another

This involves appreciating individual workloads and priorities; respecting published deadlines; punctuality; seeking and listening to other points of view; contributing to meetings in a constructive, measured way never seeking to undermine others; acknowledging colleagues in public areas of College and using a respectful and courteous tone and manner at all times when communicating with others. Email and other technology should be used in a professional way and in line with the Code of Conduct and Standards of Professional Behaviour and ICT Acceptable Use Policy for Staff.

Taking Responsibility

This involves accepting accountability and, when something goes wrong, not looking to blame but seeking to learn from the situation. This also involves discretion, judgement and effective delegation, allowing others to develop and gain satisfaction from being entrusted with responsibility.

Behaving to the Highest Standards of Professionalism

In addition to all of the above, this involves all staff adhering to and following reasonable management instructions and requests and acting with integrity in line with College values. Professional standards should be upheld at all times and staff should feel confident to raise and / or challenge unprofessional conduct or discriminatory behaviour. Staff must not engage in any conduct which could bring College's reputation into disrepute. Staff must also ensure that if they are unable to attend work for any reason that they inform their manager and obtain management authorisation for their absence.

As the welfare of the pupils must be paramount at all times, this further involves the acceptance of a Code of Conduct and Professional Standards of Behaviour, which support our aim to provide a safe and supportive environment for all pupils in our care.

SAFEGUARDING (CHILD PROTECTION) POLICY continued

In the interests of the pupils and for their own protection, College staff are expected to be familiar with and apply the policy 'Relationships between Adults and Pupils in College'. Unlawful or unsafe behaviour will not be tolerated and where appropriate, legal or disciplinary action is likely to follow.

College's designated Safeguarding Lead (DSL) and Deputy Safeguarding Lead are Richard Dodds (Vice Principal) and Caroline Ralph (Head of Pastoral Care) respectively.

Although the following will normally apply to teaching staff, all staff should be aware of College's code of conduct and apply it where appropriate:

- Must not abuse their position of trust and authority
- Must avoid all inappropriate or secretive physical contact and must seek support and advice immediately if they become the subject of an infatuation on the part of a pupil
- Should avoid any conduct which would lead any reasonable person to question their motivation and intentions
- Should avoid behaviour which may be open to misinterpretation by others or which shows a lack of a mature appreciation of the relationship between teacher and pupil. In particular, teachers should not be over-familiar or casual in their face to face, or email communication; use inappropriate humour, sarcasm or innuendo in ways which can be misconstrued; seek to relate to pupils by adopting their mannerisms and language; talk about delicate matters in their own personal life; dress in a way which erodes their authority; socialise with individual pupils out of College or do anything else which blurs the boundary between appropriate and inappropriate behaviour and leaves the member of staff vulnerable to allegations of abuse
- Should avoid divulging their personal contact details
- Should remember that they are setting an example at all times, even when off site or on a College trip
- Must conduct one-to-one meetings in a transparent way and should follow closely the guidance on confidentiality
- Should not reveal confidential information about a pupil to a third party (this does not imply key College staff involved in a pupil's education) or speak disparagingly about a pupil to other pupils
- Should avoid giving advice to a pupil on a matter for which they are not qualified
- Should discuss and / or take advice promptly from their line manager or another senior member of staff over any incident, which may give rise to concern. Records should be made of any such incident and of decisions made / further actions agreed, in accordance with College policy for keeping and maintaining records
- Should build effective professional relationships with pupils and act in their best interests.
- Must exercise professional judgement and act reasonably
- Staff should feel able to raise any legitimate concerns regarding suspected malpractice within the College in accordance with the whistleblowing procedures outlined in the Whistleblowing Policy

Online Conduct

The same standards of behaviour are expected from staff when engaged in online activities as at other times. Specific guidance is given in the ICT Acceptable Use Policy for Staff (Including the annex on Social Media use) and the policy on the Relationship between Adults and Pupils in College. Issues to consider include, but are not limited to the following:

- Staff should resist the temptation towards undue familiarity with the pupils when online
- Staff should be extremely cautious about the content of personal websites, posting blogs on the internet or the use of social networking sites

SAFEGUARDING (CHILD PROTECTION) POLICY continued

- Judicious application of security settings is called for to prevent unintended publication of personal information. In particular, staff should not admit pupils or pupils' immediate family members to their online social networks. This also applies to pupils who have recently left College as they are likely to have close contact with current pupils

ANNEX 5

TERMS OF REFERENCE: NOMINATED SAFEGUARDING COUNCIL MEMBER (NSCM)

Role

The main role of the Nominated Safeguarding Council Member (NSCM) on behalf of Council (which retains overall responsibility) is to act as College's senior board level lead to take leadership responsibility for College's safeguarding arrangements, which he will do by discharging the following functions:

Functions

- Champion the promotion of well-being, safeguarding and child protection issues at the highest level within College
- Encourage other members of Council to develop their understanding of Council's responsibilities with regard to well-being, safeguarding and child protection and support them in the performance of these duties
- Ensure that Council puts in place a suitable child protection and safeguarding policy (CPS Policy) and associated procedures which have proper regard to prevailing regulations, guidance, standards and advice
- Be familiar with the Local Safeguarding Children Board (LSCB) guidance and procedures relating to safeguarding and child protection and associated issues, including local protocols for assessment and the LSCB's threshold document, contributing to inter-agency working
- Contribute to ensuring any deficiencies in the College's safeguarding practices brought to Councils' attention from any source are investigated and addressed
- Meet regularly with the College's Designated Safeguarding Lead (DSL), Mr Richard Dodds (VP), in order to monitor the effectiveness of the College's CPS Policy and procedures and the implementation of these across College. It is recommended that this a termly meeting
- Ensure that Council receives a report on the implementation of the College's CPS Policy and procedures to support the full Council's review of safeguarding in College at least annually¹ (or earlier if needed in response to changes to the law, policy or statutory guidance or as appropriate in response to specific incidents) in accordance with all statutory guidance and guidelines adopted by Council
- Ensure that Council is made aware of any proven incident or allegation (anonymised where appropriate) which has implications for College's CPS Policy or procedures
- Ensure that the DSL is part of College's LT, and has sufficient time and resources at his disposal to carry out his duties effectively
- Ensure that the DSL (and Deputy DSL) receive appropriate training to provide them with the knowledge and skills required to carry out the role at least every two years, and that their knowledge and skills are appropriately refreshed at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role
- Ensure that arrangements are in place for the inclusion of child protection training on the College's procedures in an induction programme for all people working in College, no matter for how long, nor the status of that individual
- Ensure that College makes opportunities available to staff to feed into and shape College's approach to safeguarding and safeguarding policies
- Ensure safer recruitment procedures are in place and implemented with appropriate checks undertaken on all new staff and volunteers

¹ Council review of CPS Policy and safeguarding arrangements is carried out each autumn term.

SAFEGUARDING (CHILD PROTECTION) POLICY continued

- Review College’s Single Central Register on a termly basis, after undertaking sufficient training to be able to interrogate the register and identify potential deficiencies. It is recommended that at least one review per year is on an unannounced basis
- Be aware of how safeguarding and child protection issues, including guidance on adjusting behaviours to reduce risks, the safer use of electronic devices, social media and the internet and advice on who to turn to for help, are properly addressed through the curriculum and schemes of work
- Ensure that appropriate IT filters and monitoring systems are in place to prevent children from accessing harmful or inappropriate material
- Ensure that staff have the necessary knowledge and understanding to keep looked after children safe, with identified staff tasked to promote the educational achievement of looked after children
- Ensure that Council carries out regular risk assessments of factors particular to College which have a bearing on the profile of particular well-being and safeguarding issues, such as historical concerns, looked after children, mental health, body image, self-harm, children missing education, radicalisation, pupils performing a caring role at home, children with special educational needs or learning difficulties, those for whom English is an additional language, child sexual exploitation, female genital mutilation and cyberbullying; and both provide to, and seek from, the local authority and other relevant agencies information about how the Governing Body’s duties in respect of safeguarding and child protection have been discharged, where appropriate or requested

Governance

The identity of and contact details for the NSCM, together with an outline of his duties, will be publicised widely within the College community to ensure that pupils, parents, staff and Council Members understand the purpose and importance of the role.

To the extent that the role and duties of the NSCM conflict with those assumed by others within College, including the Chairman of Council, Council will take all necessary action to resolve those conflicts so as to achieve clarity about respective roles and duties. This may include amendments to the CPS Policy, the College’s constitutional documents and / or other governance arrangements applicable to College.

The NSCM will undertake appropriate training in accordance with the LSCB's recommendations to fulfil the respective role and duties.