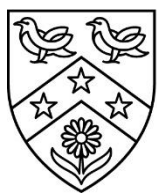


CHELTENHAM
LADIES'
COLLEGE

SAFEGUARDING (CHILD PROTECTION) POLICY

2025-26



SAFEGUARDING AND CHILD PROTECTION POLICY AND PROCEDURES

Contents

1	AIMS.....	6
2	SCOPE AND APPLICATION.....	6
3	REGULATORY FRAMEWORK.....	7
4	PUBLICATION AND AVAILABILITY.....	9
5	DEFINITIONS.....	9
6	RESPONSIBILITY STATEMENT AND ALLOCATION OF TASK.....	9
7	SAFEGUARDING PRINCIPLES.....	10
8	SPECIFIC SAFEGUARDING DUTIES IN RELATION TO CHILDREN.....	11
9	REPORTING OBLIGATIONS OF STAFF IN RELATION TO SAFEGUARDING.....	12
10	MANAGING SUPPORT FOR PUPILS INTERNALLY.....	14
11	EARLY HELP.....	14
12	MAKING A REFERRAL.....	15
13	ALLEGATIONS AGAINST PUPILS - CHILD ON CHILD ABUSE.....	16
14	CONTEXTUAL SAFEGUARDING.....	18
15	RISK ASSESSMENT.....	18
16	WHAT TO DO IF STAFF HAVE A CONCERN ABOUT SOMEONE ELSE'S WELFARE.....	18
17	ALLEGATIONS AGAINST STAFF AND LOW-LEVEL CONCERNS.....	19
18	INFORMING PARENTS.....	19
19	ADDITIONAL REPORTING.....	19
20	SAFER RECRUITMENT AND SUPERVISION OF STAFF.....	21
21	ONLINE SAFETY AND USE OF MOBILE TECHNOLOGY.....	21
22	TRAINING.....	22
23	MONITORING AND REVIEW.....	25
24	RECORD KEEPING.....	25
25	USE OF COLLEGE PREMISES FOR NON-COLLEGE ACTIVITIES.....	28
Appendices		
Appendix 1	Types and Indicators of Abuse	29
Appendix 2	Concerns about a child - guidance for staff	44
Appendix 3	Low Level Concerns and dealing with allegations against staff	46
Appendix 4	Responsibilities of the Designated Safeguarding Lead (DSL)	51
Appendix 5	Role of the Nominated Safeguarding Council Member (NSCM)	55
Appendix 6	Local arrangements	60
Appendix 7	Safeguarding Leaflet for Visitors	61
Appendix 8	Government Guidance and Advice – links to information	64
Annex A	Safeguarding Policy for CLC Services (Commercial and Health and Fitness Centre Activities)	67

Key College contacts

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<p>Deputy Designated Safeguarding Lead (DDSL) Richard Dodds, Head of LC1&2</p>	<p>Email: doddsr@cheltladiescollege.org Telephone number (term time): 01242 707004 or ext 2256 Mobile number (term time): 07538 129293 Out of hours / term contact number: 07538 129293</p>
<p>Deputy Designated Safeguarding Lead (DDSL) Jill Hill, Head of Health and Welfare</p>	<p>Email: hillj@cheltladiescollege.org Telephone (term time): 01242 707048 or ext 4503</p>
<p>Deputy Designated Safeguarding Lead (DDSL) Jo Wintle, Assistant Head Pastoral</p>	<p>Email: wintlej@cheltladiescollege.org Telephone: 01242 707027 extn 2239</p>
<p>Deputy Designated Safeguarding Lead (DDSL); Will Parker, Director of Sport and Physical Activity</p>	<p>Email: parkerw@cheltladiescollege.org Telephone: 01242 707026</p>
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Chair of Council Merryl Webster	Email: chair@cheltladiescollege.org Telephone number: The Clerk to Council 01242 908786 or ext 2401
Nominated Safeguarding Council Member David Fotheringham	Email: Fotheringhamd@cheltladiescollege.org.uk Telephone number: The Clerk to Council 01242 908786 or ext 2401

Key external contacts

<p>Designated Officer(s) of the local authority</p>	<p>Nigel Hatten, LADO (Local Authority Designated Officer) Room 114, Block 1, Shire Hall, Gloucester GL1 2TG, United Kingdom Telephone number: 01452 426 994 Email: nigel.hatten@gloucestershire.gov.uk Supported by Tracy Brooks, the Allegations Management Co-Ordinator - Telephone number - 01452 426320 Email - tracy.brooks@gloucestershire.gov.uk</p>
<p>Gloucestershire County Council children's social care department</p>	<p>Cheltenham and Tewkesbury Referral and Assessment Team Telephone number: 01242 532 447</p> <p>Early Help Co-ordinator Jubaida Rashid Email: cheltenhamearlyhelp@gloucestershire.gov.uk Telephone number: 01242 532 447</p> <p>MASH Telephone number: 01452 426565 Email: childrenshelpdesk@gloucestershire.gov.uk Out of hours emergency: 101 Duty team telephone number: 01452 614 194</p>
<p>Gloucestershire Safeguarding Children's Partnership (GSCP) and Gloucestershire Safeguarding Education Partnership (GSEP)</p>	<p>Room 114, Block 1, Shire Hall, Gloucester, GL1 2TG United Kingdom Telephone number: 01452 58 3629 Email: mail@gscb.org.uk or GSEP@gloucestershire.gov.uk</p>
<p>FGM reporting - non-emergency police contact number</p>	<p>101</p>
<p>College's Police liaison officer</p>	<p>PC Al Forrester Telephone number: 01452 907644 Email: Allen.Forrester@gloucestershire.pnn.police.uk</p>
<p>Prevent partners and advice about extremism</p>	<p>Non-emergency DfE advice 020 7340 7264 counter-extremism@education.gsi.gov.uk</p>
<p>UK Safer Internet Centre</p>	<p>0344 381 4772 helpline@saferinternet.org.uk</p>
<p>NSPCC whistleblowing helpline</p>	<p>Weston House 42 Curtain Road London</p>

	<p>EC2A 3NH</p> <p>Telephone: 0800 028 0285 Email: help@nspcc.org.uk https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/</p>
NSPCC Reporting Abuse in Education Helpline	<p>Telephone: 0800 136 663</p>
Reporting serious wrongdoing to the Charity Commission	<p>For further guidance see: https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer</p> <p>whistleblowing@charitycommission.gov.uk</p>

1 AIMS

- 1.1 This is the safeguarding and child protection policy and procedures of Cheltenham Ladies' College (**College**).
- 1.2 The aims of this policy are as follows:
 - 1.2.1 to actively promote the welfare of children, staff and others who come into contact with College and to protect them from harm;
 - 1.2.2 to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and / or allegations of abuse (including child on child abuse);
 - 1.2.3 to raise staff awareness about the College's safeguarding expectations;
 - 1.2.4 to raise awareness about how to report concerns and ensure they are appropriately investigated;
 - 1.2.5 to ensure staff are competent to carry out their safeguarding responsibilities and feel supported in this role;
 - 1.2.6 to ensure consistent good safeguarding practice throughout College; and
 - 1.2.7 to create a culture of safety, equality and protection.
- 1.3 College does not distinguish between pupils on the grounds of age, in that it does not consider that its child protection responsibilities should end once a pupil attains the age of 18. Any reference to 'child' or 'pupil' in this policy or other College policies includes any pupil aged 18 years or over.

2 SCOPE AND APPLICATION

- 2.1 This policy applies to the whole College.
 - 2.1.1 This policy applies at all times including where pupils or staff are away from College.
 - 2.1.2 This policy applies to core College activities and to out of hours activities.
 - 2.1.3 This policy does not cover the commercial activities in College run by CLC Services, which operates its own safeguarding arrangements. Please contact CLC Services for details of their arrangements.
- 2.2 This policy is designed to address:
 - 2.2.1 College's charity law safeguarding duty to:
 - (a) provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff and volunteers;
 - (b) set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly;
 - (c) have adequate safeguarding policies, procedures and measures to protect people;

- (d) provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the police, local authority and Charity Commission; and
- (e) the specific statutory obligations on College to safeguard and promote the welfare of children, as defined below.

3 REGULATORY FRAMEWORK

3.1 This policy has been prepared to meet College's responsibilities under:

- 3.1.1 Education (Independent School Standards) Regulations 2014;
- 3.1.2 *Boarding schools: national minimum standards* (Department for Education (DfE), September 2022);
- 3.1.3 Education and Skills Act 2008;
- 3.1.4 Children Act 1989;
- 3.1.5 Childcare Act 2006;
- 3.1.6 Children and Social Work Act 2017;
- 3.1.7 Data Protection Act 2018 and General Data Protection Regulation (GDPR);
- 3.1.8 Equality Act 2010; and
- 3.1.9 Charities Act 2011.

3.2 This policy has regard to the following guidance and advice. Links to this guidance and advice is also available at

- 3.2.1 **KCSIE 2025: Keeping children safe in education 2025**
- 3.2.2 Working together to safeguard children 2023 **Working together to safeguard children 2023: statutory guidance** (publishing.service.gov.uk) - including all updates upto May 2025
- 3.2.3 Disqualification under the Childcare Act 2006 (DfE, 31 August 2018);
- 3.2.4 Prevent Duty Guidance for England and Wales (HM Government, July 2015);
- 3.2.5 Channel duty guidance 2023: **Channel duty guidance: protecting people susceptible to radicalisation (accessible) - GOV.UK** (www.gov.uk)
- 3.2.6 Educate Against Hate (HM Government 2018);
- 3.2.7 Multi-agency statutory guidance on female genital mutilation (HM Government, April 2016);
- 3.2.8 What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015);
- 3.2.9 Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018);
- 3.2.10 Sexting in schools and colleges: responding to incidents and safeguarding young people (UK Council for Child Internet Safety (UKCCIS), August 2016);
- 3.2.11 Children missing education (DfE, September 2016);
- 3.2.12 Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (DfE, February 2017);
- 3.2.13 Sexual violence and sexual harassment between children in schools; Part 5 KCSIE: **[Withdrawn] Sexual violence and sexual harassment between children in schools and colleges - GOV.UK** (www.gov.uk)

- 3.2.14 Searching, screening and confiscation: advice for schools July 2022 ; [Searching, Screening and Confiscation \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
- 3.2.15 Listening to and involving children and young people. (DfE, January 2014);
- 3.2.16 Preventing and Tackling Bullying (2017)
- 3.2.17 Mental Health and Behaviour in Schools (2018)
- 3.2.18 Safeguarding children (links to government guidance and resources);
- 3.2.19 Relationships education, relationships and sex education and health education guidance (DfE, June 2021)
<https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>
- 3.2.20 Strategy for dealing with safeguarding issues in charities (Charity Commission, December 2017);
- 3.2.21 Regulatory alert to charities - safeguarding (Charity Commission, December 2017);
- 3.2.22 How to report a serious incident in your charity (Charity Commission, June 2019);
- 3.2.23 Report serious wrongdoing at a charity as a worker or volunteer (Charity Commission, October 2018);
- 3.2.24 NPCC When to call the Police
- 3.2.24 Gloucestershire Safeguarding Children's Partnership – Multi Agency Safeguarding Hub (MASH); [Link](#)
- 3.2.25 Covid-19 Safeguarding in Schools and Colleges
- 3.2.26 Farrer & Co's Child on Child Abuse [toolkit](#)
- 3.2.27 Sharing nudes and semi-nudes: advice for educational settings
- 3.2.29 Operation Encompass (<https://www.operationencompass.org/>)
- 3.2.30 Behavioural Guidance in Schools 2022: [Link](#)
- 3.2.31 Working Together to Improve School Attendance 2024: [Link](#)

3.3 The following College policies, procedures and resource materials are relevant to this policy:

- 3.3.1 staff code of conduct;
- 3.3.2 staff ICT acceptable use and social media policy;
- 3.3.3 whistleblowing policy;
- 3.3.4 recruitment and selection policy;
- 3.3.5 online safety policy;
- 3.3.6 behaviour, discipline and rewards policy;
- 3.3.7 anti-bullying policy and anti-cyberbullying policy;
- 3.3.8 ICT acceptable use policy for pupils;
- 3.3.9 visitors and volunteers policy;
- 3.3.10 risk assessment policy for pupil welfare;
- 3.3.11 missing child policy;
- 3.3.12 inclusion and access policy;
- 3.3.13 learning support policy;
- 3.3.14 induction for all staff policy
- 3.3.15 alcohol, drugs and smoking policy for pupils;
- 3.3.16 attendance and registration policy;
- 3.3.17 educational visits policy;
- 3.3.18 equal opportunities policy;
- 3.3.19 physical interventions and positive handling policy;
- 3.3.20 policy for pupils' relationships within College
- 3.3.21 relationships between staff and pupils policy;
- 3.3.22 search and confiscation policy for pupils;

- 3.3.23 relationships and sex education policy
- 3.3.24 health and safety policy;
- 3.3.25 medical policy; and
- 3.3.26 mental health policy.

4 PUBLICATION AND AVAILABILITY

- 4.1 This policy is published on the College website.
- 4.2 This policy is available in hard copy on request.
- 4.3 A copy of the policy is available for inspection from the Principal's Office during the College day.
- 4.4 This policy can be made available in large print or other accessible format if required.
- 4.5 This policy and all policies referred to in it are also available to staff on the College intranet.

5 DEFINITIONS

- 5.1 Where the following words or phrases are used in this policy:
 - 5.1.1 References to the **Proprietor** are references to Council;
 - 5.1.2 References to **working days** mean Monday to Friday, when College is open during term time. The dates of terms are published on the College website. If referrals to an external agency are required outside term time, references to **working days** are to the days on which the relevant external agency is working;
 - 5.1.3 **Safeguarding** is the protection of people from harm.
 - 5.1.4 **Safeguarding and promoting the welfare of children** is defined in WTSC and KCSIE as:
 - protecting children from maltreatment, inside or outside the home, including online.
 - providing help and support to meet the needs of children as soon as problems emerge
 - preventing impairment of children's mental or physical health or development;
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - taking action to enable all children to have the best outcomes.
 - 5.1.5 **DSL** means the School's Designated Safeguarding Lead. References to the DSL include the Deputy DSL (**DDSL**) where the DSL is unavailable.
 - 5.1.6 Reference to **staff** includes all those who work for or on behalf of College, regardless of their employment status, including contractors, volunteers and members of Council unless otherwise indicated.

6 RESPONSIBILITY STATEMENT AND ALLOCATION OF TASK

- 6.1 Council has overall responsibility for all matters which are the subject of this policy and has specific responsibilities as described in Part 2 of KCSIE.
- 6.2 Council has nominated one of its senior board level members to take leadership responsibility for College safeguarding arrangements. Contact details are set out in the College contacts list at the front of this policy.

6.3 To ensure the efficient discharge of its responsibilities under this policy, Council has allocated the following tasks:

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	Head of Pastoral Care (DSL)	As required, and at least termly
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Head of Pastoral Care (DSL)	As required, and at least termly
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the GDPR	Head of Pastoral Care (DSL)	As required, and at least termly
Seeking input from interested groups (such as pupils, staff, parents) to consider improvements to the College's processes under the policy	Head of Pastoral Care Assistant Head Pastoral	As required, and at least annually
Formal annual review of the College's safeguarding policies and procedures and their implementation.	Council	At least annually

6.4 Designated Safeguarding Lead

- 6.4.1 The DSL is a senior member of staff of the College's senior leadership team with the necessary status and authority to take lead responsibility of all aspects of safeguarding and child protection (including online safety) throughout the College.
- 6.4.2 The DSL has the time, funding, training, resources and support to enable him to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and / or to support other staff to do so) and to contribute to the assessment of children. The name and contact details of the DSL are set out in the College contacts list at the front of this policy. The main responsibilities of the DSL are set out in Appendix 4.
- 6.4.3 If the DSL is unavailable the activities of the DSL will be carried out by the Deputy DSL. The Deputy DSL's details are also set out in the College contacts list at the front of this policy.

7 SAFEGUARDING PRINCIPLES

- 7.1 College will take reasonable steps to ensure that its pupils and others who come into contact with College do not, as a result, come to harm or are exposed to abuse.
- 7.2 Abuse is a form of maltreatment. Somebody may abuse or neglect a person by inflicting harm, or by failing to act to prevent harm. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.
- 7.3 Any safeguarding concern raised by any person will be taken seriously and action taken in accordance with the relevant College policies and procedures.

8 SPECIFIC SAFEGUARDING DUTIES IN RELATION TO CHILDREN

- 8.1 Safeguarding and promoting the welfare of children is **everyone's** responsibility.
- 8.2 Every pupil should feel safe and protected from any form of abuse and neglect. The indicators of abuse and neglect and examples of specific safeguarding issues are set out in Appendix 1
- 8.3 College is committed to acting in the best interests of the child so as to safeguard and promote the welfare of children and young people. College requires everyone who comes into contact with children and their families to share this commitment.

8.3.1 College will:

- (a) follow the local inter-agency procedures of the Gloucestershire Safeguarding Children's Partnership and Gloucestershire Safeguarding Education Partnership;
- (b) be alert to signs of abuse both in College and from outside and take steps to protect individuals from any form of abuse, whether from an adult or another child;
- (c) respond immediately where a child is found to have suffered or be likely to suffer significant harm.
- (d) include opportunities within the curriculum for children to develop the skills they need to recognise, and stay safe from abuse;
- (e) deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with appropriate education, child protection and / or welfare plans;
- (f) design and operate procedures which, so far as possible, ensure that staff and others who are innocent are not prejudiced by malicious, false, unsubstantiated or unfounded allegations;
- (g) prepare staff to identify children who may benefit from early help and encourage them to be particularly alert to the potential need for early help for children with the indicators listed in KCSIE or WTSC;
- (h) be alert to the needs of pupils with physical or mental health conditions, special educational needs or disabilities, where additional barriers can exist when detecting abuse or neglect;
- (i) encourage a culture of listening to pupils and taking account of their wishes and feelings in any measure put in place by College to protect them;
- (j) operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;
- (k) assess the risk of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;

- (l) identify pupils who may be vulnerable to radicalisation, and know what to do when they are identified; and
- (m) consider and develop procedures to deal with any other safeguarding issues which may be specific to individual pupils in College or in the local area.

8.4 Staff may follow the College whistleblowing policy to raise concerns about poor or unsafe safeguarding practices at College or potential failures by College or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see the front of this policy for the relevant contact details). Staff may also report concerns direct to the College's Local Authority or to the Charity Commission if they consider that College has failed to deal with concerns appropriately.

9 REPORTING OBLIGATIONS OF STAFF IN RELATION TO SAFEGUARDING

9.1 Reporting obligations generally

9.1.1 Staff members should maintain an attitude of "**it could happen here**" where safeguarding is concerned. When concerned about the welfare of a pupil, staff members should always act in the **best** interests of the pupil.

9.1.2 All staff have a duty to:

- (a) report any concerns they may have about the safety and / or wellbeing of pupils;
- (b) report any concerns they may have about the safety and / or wellbeing of other persons associated with College;
- (c) report any safeguarding concerns about staff or anyone else associated with College; and
- (d) follow up on any such reports to ensure that appropriate action is or has been taken.

9.1.3 The procedures for doing so are set out below. If staff are unsure about the appropriate process to use, they should not hesitate to speak to the DSL, senior leadership team or directly to children's social care or police in their absence for guidance.

9.2 What to do if staff have a concern about a pupil

9.2.1 If staff have **any concern about a pupil's welfare**, they should report their concern to the DSL (or the DDSL in the DSL's absence) **immediately** and log their concern under the safeguarding category on CPOMS.

- (a) The contact details of the DSL, DDSL and additional Deputy DSLs are set out in the contacts list at the front of this policy.
- (b) See Appendix 2, for guidance about what to do when receiving a disclosure and recording a concern.

9.2.2 A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from

extra support to an emerging problem or to a potentially unmet need or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989.

9.2.3 Teachers must report known cases of female genital mutilation (**FGM**) to the police. See Appendix 1 for further information about FGM and this reporting duty. All other staff should refer FGM concerns to the DSL.

9.2.4 If the concern involves an **allegation against a member of staff**, this must be reported in accordance with the procedures set out in Appendix 3.

9.2.5 **What if the DSL is unavailable?**

- (a) The DSL or the DDSLs should always be available to discuss safeguarding concerns and may be contacted on their mobile phones in relation to any safeguarding concerns out of College hours. Their mobile numbers are published at the start of this policy.
- (b) If in exceptional circumstances the DSL and DDSLs are unavailable, staff must not delay taking action. Staff should speak to their line manager or a member of the senior leadership team and / or advice should be taken from children's social care. Their contact details are set out at the front of this policy.
- (c) Where a child is suffering, or is likely to suffer from significant harm, a referral to children's social care and / or police should be made immediately. Staff should be aware of the process for making referrals direct to children's social care and / or the police in these circumstances. See section 10 below for further details on making a referral.
- (d) Any action taken by a member of staff pursuant to this requirement should then be shared with the DSL or DDSL, or a member of the senior leadership team, as soon as is practically possible.

9.3 **Action by the DSL**

9.3.1 On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the Gloucestershire Safeguarding Children's Partnership and Gloucestershire Safeguarding Education Partnership procedures and referral threshold document. Such action may include:

- (a) managing any support for the pupil internally via the College's own pastoral support processes, seeking advice from children's social care where required (see 10 below);
- (b) an early help assessment (see 11 below); or
- (c) a referral for statutory services (see 12 below).

9.3.2 The views of the child will be taken into account when considering the appropriate course of action, but will not be determinative.

9.3.3 Where the concern relates to the welfare of a pupil who is aged 18 or over, the DSL will consider whether it is necessary to refer such

concerns to the Safeguarding Adults Board rather than, or in addition to children's social care.

- 9.3.4 If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving.
- 9.3.5 Safeguarding information will be held under the secure safeguarding section on CPOMS. The DSL and DDSLs have access to this information and as well as keeping records of any concerns, discussions and decisions, the designated safeguarding leads will also keep records on CPOMS of the rationale for any decisions made.

10 MANAGING SUPPORT FOR PUPILS INTERNALLY

- 10.1 College has a framework for the identification, assessment, management and review of risk to pupil welfare, so that appropriate action can be taken to reduce the risks identified. See section 15 and the College risk assessment policy for pupil welfare.
- 10.2 College has pastoral support processes in place which include; the role of the Houseparent and House staff, the Wellbeing programme, the Medical Centre, the College Counsellors and peer support through the peer mentors and Big Sisters.

11 EARLY HELP

- 11.1 Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years and throughout the teenage years. College understands that providing early help is more effective in promoting the welfare of children than reacting later.
- 11.2 College safeguarding training includes guidance about the early help process and prepares all staff to identify children who may benefit from early help. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges. Staff should be particularly alert to the potential need for early help for a child who:
 - 11.2.1 is disabled and has specific additional needs;
 - 11.2.2 has special educational needs (whether or not they have a statutory education, health and care plan);
 - 11.2.3 is a young carer;
 - 11.2.4 is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
 - 11.2.5 is frequently absent or missing from College (education, home or care);
 - 11.2.6 is at risk of modern slavery, trafficking or exploitation;
 - 11.2.7 is at risk of being radicalised or exploited;
 - 11.2.8 is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems, domestic abuse, or has a parent in custody or is affected by parent offending.
 - 11.2.9 is misusing drugs or alcohol themselves;

- 11.2.10 is looked after or has returned home to their family from care;
 - 11.2.11 is a privately fostered child.
 - 11.2.12 has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- 11.3 A member of staff who considers that a pupil may benefit from early help should in the first instance discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the Gloucestershire Safeguarding Children's Partnership and Gloucestershire Safeguarding Education Partnership menu of early help services and their referral threshold document and will support staff in liaising with other agencies and setting up an inter-agency assessment as appropriate.
- 11.4 All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.
- 11.5 If early help is appropriate, staff may be required to support other agencies and professionals in an early help assessment and will be supported by the DSL in carrying out this role. In some cases, College staff may be required to take a lead role.
- 11.6 The matter will be kept under review and consideration given to a referral to children's social care for assessment for statutory services if the pupil's situation appears to be getting worse or does not appear to be improving.

12 MAKING A REFERRAL

- 12.1 **Where a child is suffering, or is likely to suffer from significant harm, a referral to children's social care (and if appropriate the police) should be made immediately and anyone may make a referral.** The contact details for children's social care are set out at the front of this policy.
- 12.2 **Statutory assessments**
- 12.2.1 Children's social care may undertake a statutory assessment under the *Children Act 1989* into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:
- (a) **Children in need:** *A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.* Children in need may be assessed under section 17 of the Children Act 1989.
 - (b) **Children suffering or likely to suffer significant harm:** Local authorities have a duty to make enquiries under section 47 of the

Children Act 1989 if they have reasonable cause to suspect that *a child is suffering, or is likely to suffer, significant harm.*

- 12.3 Staff required to make a direct referral may find helpful the flowchart set out on page 24 of KCSIE and the flowcharts set out on pages 76 & 78 of WTSC for information about the likely actions and decisions required.
- 12.4 Staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:
 - 12.4.1 personal details of the child including the child's developmental needs;
 - 12.4.2 detailed information about the concern;
 - 12.4.3 information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.
- 12.5 If the referral is made by telephone, this should be followed up in writing.
- 12.6 If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.
- 12.7 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.
- 12.8 Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure that the concerns have been addressed and that the child's situation improves.

13 ALLEGATIONS AGAINST PUPILS - CHILD ON CHILD ABUSE

- 13.1 All staff should recognise that children are capable of abusing their peers (including online). Allegations against pupils should be reported in accordance with the procedures set out in this policy; to the DSL or a Deputy or member of Pastoral staff. Pupils can also report confidentially via the TooToot App. If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 KCSIE, the DfE guidance on sexual violence and sexual harassment, and take into account the local response of the police and children's social care to these issues. College will discuss with the local statutory safeguarding partners to agree the levels for the different types of assessment and services as part of the local arrangements. The views of the alleged victim will be taken into account but will not be determinative. Abuse that occurs online or outside of the school or college will be treated equally seriously.
- 13.2 College has a zero-tolerance approach to abuse, and it should never be passed off as "banter". All child-on-child abuse is unacceptable; see Appendix 1 for the different forms this abuse can take. It is essential that all victims are reassured that they are being taken seriously and that they will be supported. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be

made to feel ashamed for making a report. College's initial response to a report from a pupil is incredibly important; the response to a report can encourage or undermine the confidence of future victims to report or come forward. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

- 13.3 Ultimately, any decisions are for the College to make on a case-by-case basis, with the DSL (or a deputy) taking a leading role and using their professional judgement, and taking advice and being supported by other agencies, such as children's social care and the police as required. College will take advice on when and how to inform the pupil and her parents about the allegations and how investigation of such allegations will be conducted. College will carry out risk assessments and take all appropriate action to ensure the safety and welfare and continued education of all pupils including the pupil or pupils accused of abuse. A pupil against whom an allegation of abuse has been made may be suspended from the College as a neutral measure during the investigation and College policy on behaviour, discipline and sanctions will apply.
- 13.4 If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, College will ensure that, subject to the advice of relevant agencies, the pupil's parents are informed as soon as possible, and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's education guardian will be requested to provide support to the pupil and to accommodate her if it is necessary to suspend her as a neutral measure during the investigation.
- 13.5 All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services as necessary. The nature of this support will be judged on a case-by-case basis using the internal College pastoral support measures and external services. This support includes and understanding of any intra-familial harms and any necessary support for siblings following incidents. If a report is shown to be deliberately invented or malicious, College will consider whether any disciplinary action is appropriate against the individual who made it as per the College behaviour, disciplinary and rewards policy.
- 13.6 College's intention is to encourage pupils to form positive friendships with each other, which are relaxed, natural and mutually respectful. The 'Policy for Pupil Relationships within College' clearly sets out College's reasonable expectations regarding appropriate behaviours and ensures that these are in line with College's contractual and statutory safeguarding obligations.
- 13.7 There are four likely scenarios for schools and colleges to consider when managing any reports of sexual violence and/or sexual harassment. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the College will decide on a course of action. The four scenarios for managing reports are:
 - Manage Internally
 - Early Help

- Referral to Children's Social Care
- Reporting to the Police

14 CONTEXTUAL SAFEGUARDING

- 14.1 Safeguarding incidents and / or behaviours can be associated with factors outside College and / or can occur between children outside College.
- 14.2 All staff, including the DSL, should consider the context within which such incidents and / or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and / or welfare and should record these appropriately. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
- 14.3 Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.

15 RISK ASSESSMENT

- 15.1 Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.
- 15.2 The format of risk assessment may vary and may be included as part of the College's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the College approach to promoting pupil welfare will be systematic and pupil focused.
- 15.3 The Head of College has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.
- 15.4 Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

16 WHAT TO DO IF STAFF HAVE A CONCERN ABOUT SOMEONE ELSE'S WELFARE

- 16.1 Staff who have concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy, should report them.
- 16.2 In the absence of an express procedure about reporting, they should report such concerns to their line manager or the DSL in the first instance.

17 ALLEGATIONS AGAINST STAFF AND LOW-LEVEL CONCERNS

17.1 College has procedures for dealing with allegations against staff (including supply staff and volunteers):

17.1.1 The procedures in this policy apply to staff who pose a risk of harm to children and aim to strike a balance between the need to protect children from abuse and the need to protect staff from malicious, false, unsubstantiated or unfounded allegations. These procedures are set out in Appendix 3 and follow Part 4 of KCSIE.

17.1.2 All concerns about adults (including allegations that do not meet the harm threshold) should be shared, recorded and dealt with appropriately. The term 'low-level' concern does not mean that it is insignificant, it is any concern – no matter how small, even if no more than causing a sense of unease or a 'nagging doubt'. Details of how to respond to low level concerns and the procedures to be followed are set out in Appendix 3 and follow Part 4 of KCSIE.

17.2 Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of College in relation to contact with pupils, parents, colleagues and any other person who comes into contact with College. This guidance is contained in the Employment Manual and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.

18 INFORMING PARENTS

18.1 Parents will normally be kept informed, as appropriate, of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Head, the Designated Officer(s), children's social care, the police and / or the pupil before discussing details with parents.

18.2 In all cases, the DSL will be guided by the Gloucestershire Safeguarding Children's Partnership and Gloucestershire Safeguarding Education Partnership referral threshold document.

18.3 See also Appendix 3 for details about the disclosure of information where an allegation has been made against a member of staff.

19 ADDITIONAL REPORTING

19.1 In addition to the reporting requirements explained above, College will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:

19.1.1 **Health and Safety Executive**

(a) College is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the College Health and Safety Policy for further details about this.

19.1.2 **Charity Commission**

(a) College is a registered charity and is required to report all serious incidents to the Charity Commission promptly in

- accordance with the guidance: How to report a serious incident in your charity (Charity Commission, June 2019).
- (b) Serious incidents that will be reported to the Charity Commission include suspicions, allegations or incidents of abuse involving pupils. This is likely to involve the following:
 - (i) Pupils or other beneficiaries have been, or are alleged to have been, abused or mistreated while under the care of College or by someone connected with College, for example a Member of Council, staff member or volunteer;
 - (ii) there has been an incident involving the abuse or mistreatment (alleged or actual) of someone who has come into contact with the College through its work, which has resulted in or risks significant harm, and this is connected with the activities of the College;
 - (iii) there has been a breach of College procedures or policies which has put pupils or others who come into contact with it at risk of significant harm, including failure to carry out checks which would have identified that a person is disqualified in law, under safeguarding legislation, from working with children or otherwise disqualified from holding their position.
 - (c) College will notify the Charity Commission of other agencies to which the incident has been reported in accordance with this policy.
 - (d) College will tell the Charity Commission what action it has taken or is planning to take at the time of reporting a serious incident, including the immediate management of the incident and any wider review or lessons learned exercise.

19.1.3 **Disclosure and Barring Service (DBS)**

- (e) A referral to the DBS will be made promptly if, following investigation and advice from external services, such a referral is deemed appropriate.

19.1.4 **Teaching Regulation Agency (TRA)**

- (f) Separate consideration will be given as to whether a referral to the TRA should be made where a teacher has been dismissed or would have been dismissed if he / she had not resigned. Advice from external services will be sought as required to aid in this decision-making process

19.1.5 **Insurers**

- (a) College will consider whether it is necessary to report a safeguarding incident to the relevant insurers and / or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.
- (b) Care should be taken to ensure this is done before renewal to ensure that the College complies with its duties under the Insurance Act 2015. If College is in any doubt with regard to the correct insurer and / or policy and / or if it is unable to locate the relevant insurer, professional advice should be sought.

19.1.6 **Boarding Schools Association (BSA)**

- (a) College will report safeguarding matters to the BSA as required by their Safeguarding Charter.

20 SAFER RECRUITMENT AND SUPERVISION OF STAFF

- 20.1 College is committed to practising safer recruitment in checking the suitability of staff (including staff employed by another organisation). See the College's separate Recruitment and Selection Policy.
- 20.2 College maintains a single central register of appointments for all staff.
- 20.3 College protocol for ensuring that visiting speakers are suitable and appropriately supervised is set out in the College's separate visitors and volunteers' procedure.
- 20.4.1 Where alternative provision is in place, College will obtain written confirmation of safer recruitment checks for all AP staff;
- 20.4.2 know the exact location of students during school hours; and
- 20.4.3 review AP placements half-termly to ensure safety and suitability.
- 20.4.4 The Virtual School Head is the Head of College.

21 ONLINE SAFETY AND USE OF MOBILE TECHNOLOGY

- 21.1 The College's approach to managing online safety is set out in detail in the College Online Safety Policy. This policy also references the ICT Acceptable Use policies and Staff Code of Conduct for managing online safety

The Online Safety Policy outlines how pupils are safeguarded from potentially harmful and inappropriate online material. It details an effective whole College approach to online safety to empower protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. Colleges is also in regular contact with parents to reinforce the importance of children being safe online including the systems used to filter and monitor online use.

College uses the following software to filter and monitor the College network;

Watchguard: <https://www.watchguard.com/uk>. Firewall to provide network and identity security, MFA and Endpoint Security.

Smoothwall: <https://www.smoothwall.com/education/>. Monitoring software for all pupils on the College one to one device scheme. Pupil activity is monitored in real-time, during term time, alerting any risks to the DSL team to allow for early intervention.

The filtering and monitoring conform to the filtering and monitoring standards published by the DofE; [Link](#)

In addition, College meets the Cyber Security Standards for Colleges; [Link](#)

All Staff receive training so that they are aware of the filtering and monitoring systems that are in place. Staff are also aware that the filtering software is

monitored and maintained by the IT Department as part of the College Firewall, and that any issues that are identified are referred to the DSL.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- content: being exposed to:
 - Misinformation - illegal, inappropriate, or harmful content, for example: pornography, self-harm and suicide.
 - Disinformation ie. fake news, racism, misogyny, anti-Semitism, radicalisation, and extremism, including conspiracy theories.
- contact: being subjected to harmful online interaction with other users; for example:
 - peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- conduct: online behaviour that increases the likelihood of, or causes, harm; for example,
 - making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
- commerce: - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

21.2 College policy on the use of mobile technology, including phones and cameras, in College, is as follows:

21.2.1 the College ICT acceptable use policy for pupils which sets out the expectations on pupils from Year 7 to Year 13;

21.2.2 all staff should use mobile devices and cameras in accordance with the guidance set out in the staff code of conduct and staff ICT acceptable use policy;

21.2.3 parents of all pupils may bring mobile devices onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

22 TRAINING

22.1 College ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.

22.2 The level and frequency of training depends on the role of the individual member of staff.

22.3 College maintains written records of all staff training.

22.4 All training will be carried out in accordance with Gloucestershire Safeguarding Children's Partnership and Gloucestershire Safeguarding Education Partnership procedures where possible.

22.5 Induction

22.5.1 All staff, including temporary staff and volunteers, will be provided with induction training that includes (and where relevant includes the provision of copies of):

- (a) this policy;
- (b) the role, identity and contact details of the DSL and his / her Deputies;
- (c) the behaviour, discipline and rewards policy for pupils;
- (d) the staff code of conduct including the whistleblowing policy, staff social media policy and acceptable use policy;
- (e) the safeguarding response to children who go missing from education;
- (f) the College approach to online safety;
- (g) safeguarding training in accordance with Gloucestershire Safeguarding Children's Partnership and Gloucestershire Safeguarding Education Partnership procedures including guidance on managing a report of child-on-child harmful sexual behaviour;
- (h) a copy of Part 1 or, where appropriate, Annex A of KCSIE (a condensed version of Part 1). In addition, College leaders and those staff who work directly with children should also read Annex B
- (i) appropriate Prevent duty training.

22.6 Safeguarding training

22.6.1 All staff including, the Executive Principal and Head of College, will receive a copy of this policy and Part 1 and staff who work directly with children will also receive, Annex A of KCSIE, and be required to confirm that they have read and understand these.

22.6.2 The Executive Principal, Head of College and all staff members will undertake appropriate safeguarding training which will be updated every two years and following consultation with the Gloucestershire Safeguarding Children's Partnership and Gloucestershire Safeguarding Education Partnership. In addition, all staff members will receive safeguarding and child protection updates via email, and staff briefings on a regular basis and at least annually.

22.6.3 Staff development training will also include training on online safety, searching pupils for prohibited and banned items, and Prevent duty training assessed as appropriate for them by College.

22.6.4 Additionally, College will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, harmful sexual behaviour, child sexual exploitation, female genital mutilation, cyberbullying and mental health and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

- 22.6.5 All Members of Council receive safeguarding training on induction. The Nominated Safeguarding Member of Council and the Chair of Council will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities.
- 22.6.6 College has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant knowledge, skills and experience to safeguard children effectively, including online training questionnaires and staff training. This includes information on how staff can report concerns occurring out of hours / out of term time.

22.7 Designated Safeguarding Lead (DSL)

- (a) The DSL and Deputy DSL will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent awareness training and will be updated at least every two years.
- (b) In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role.
- (c) Prevent duty training will be consistent with Home Office Workshop to Raise Awareness of Prevent (**WRAP**) training if available.

22.7.1 Teaching pupils about safeguarding

- (a) College teaches pupils about safeguarding through the curriculum, the Wellbeing programme and PSHE. This includes guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves, fostering healthy and respectful relationships with others, providing information about who they should turn to for help, the explanation of the legal position regarding the age of consent and abuse of trust.
- (b) Pupils are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through relationships, sex and health education (RSHE) and through PSHE education appropriate to their age and stage of development.
- (c) Pupils are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how any report will be handled. The College concerns and complaints procedure for pupils sets out in writing what pupils should do if they have a worry or complaint.
- (d) The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. Pupils have a range of trusted adults and other confidential reporting means to share any concerns.
- (e) Pupils are informed about this Policy and the sources of help and advice in College, including the Counselling Service and

the Medical Centre as well as Children's Social Care and agencies such as Childline and the NSPCC.

- (f) Prefects, peer mentors and SFC1 pupils in the Big Sister group are made aware of this policy as part of their training.
- (g) The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities. College has appropriate filters and monitoring systems in place (see the online safety policy) and is mindful that this should not lead to unnecessary restrictions on learning.

23 MONITORING AND REVIEW

23.1 The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with Council as necessary and seeking contributions from staff. The DSL will update the Senior Management Team regularly on the operation of the College safeguarding arrangements.

23.2 Any safeguarding incidents at College will be followed by a review of these procedures by the DSL and a report made to Council. Where an incident involves a member of staff, the Designated Officer(s) will be asked to assist in this review to determine whether any improvements can be made to College procedures. Any deficiencies or weaknesses in regard to safeguarding arrangements at any time will be remedied without delay.

23.3 Council will undertake an annual review of this policy and the College safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working.

23.4 The DSL will work with the Nominated Safeguarding Member of Council, preparing a written report commissioned by Council. The written report should address how College ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in College and how these have been handled; and the contribution College is making to multi-agency working in individual cases or local discussions on safeguarding matters. Council should also consider independent corroboration, such as:

23.4.1 inspection of records or feedback from external agencies including the Designated Officer(s);

23.4.2 reports of ISI inspections;

23.4.3 the outcome of any relevant complaints, claims or related proceedings; and

23.4.4 press reports.

23.5 Council will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy its final approval. Detailed minutes recording the review by Council will be made.

24 RECORD KEEPING

- 24.1 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing on CPOMS (our electronic system for recording safeguarding and child protection notes).
- 24.2 The records created in accordance with this policy may contain personal data. College has a number of privacy notices which explain how College will use personal data for the benefit of pupils and parents. The privacy notices are published on the College website. In addition, staff must ensure that they follow the College data protection policies and procedures when handling personal data created in connection with this policy. This includes the College data protection policies.
- 24.3 All records created in accordance with this policy are managed in accordance with the College policies that apply to the retention and destruction of records.
- 24.4 Insofar as pupil records are concerned:
- 24.4.1 Staff must record all safeguarding concerns about a pupil on the College safeguarding software (CPOMS). Any significant concerns should be passed directly to the DSL or DDSL who will file in CPOMS. The information, which is sensitive and personal, should be treated as 'special category personal data'. Guidance on record keeping is set out in Appendix 2.
- 24.4.2 The DSL will open a child protection file in CPOMS following a report to him of a child protection concern about a pupil. The DSL will record all discussions with both colleagues and external agencies, decisions made and the reasons for them and detail of the action taken.
- 24.5 Information sharing and multi-agency working:
- 24.5.1 College will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. College will always act in order to safeguard and promote the welfare of others.
- 24.5.2 College understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of pupils, which is always the College's paramount concern. College understands that the GDPR and Data Protection Act 2018 provide a framework to ensure that personal information is shared appropriately. Staff at College have been trained in Data Protection to comply with data protection law to understand what staff and pupil data to keep; and prevent personal data breaches.
- 24.5.3 College will co-operate with children's social care, and where appropriate the police, to ensure that all relevant information is shared for the purposes of early help assessments, and assessments and child protection investigations under the Children Act 1989.
- 24.5.4 Where allegations have been made against staff, College will consult with the Designated Officer(s) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.
- 24.5.5 While College will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may

pose a risk of harm to others or because it has been prohibited by external agencies.

24.5.6 Records concerning allegations of abuse will be preserved for the term of the independent Inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer.

25 USE OF COLLEGE PREMISES FOR NON-COLLEGE ACTIVITIES

- 25.1.1 College premises are used by non-College organisations and individuals. This includes the use of the Health and Fitness Centre by members, and the use of the premises by summer schools or sports clubs.
- 25.1.2 These activities are overseen by CLC Services which has its own Safeguarding procedures that are followed to ensure all young people on site are safeguarded. This is led by the College Commercial Manager, Mrs Hannah Dwyer. Telephone: 01242 520691, Email: dwyerh@cheltladiescollege.org During Ms Dwyer's absence, please contact Nigel Richards, email richardsn@cheltladiescollege.org
- 25.1.3 The College will be informed and consulted as required on any safeguarding issues that arise.

VERSION CONTROL

Date of adoption of this policy	01 September 2021
Date of last review of this policy	August 2025
Date for next review of this policy	July 2026 <i>(or as required by legislation)</i>
Policy owner Miss Caroline Ralph	Designated Safeguarding Lead
Review at Council	Council Out of Committee – Summer 2025

Appendix 1: Types and Indicators of Abuse

1 TYPES OF ABUSE

1.1 Part 1 of KCSIE defines the following indicators of abuse, neglect and exploitation. However, staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another.

1.2 **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. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

1.3 **Physical abuse:** All children have trips, falls and accidents which may cause cuts, bumps and bruises. These injuries tend to affect bony areas of their body such as elbows, knees and shins and are not usually a cause for concern. Injuries that are more likely to indicate physical abuse include:

Bruising:

- bruises on the cheeks, ears, palms, arms and feet
- bruises on the back, buttocks, tummy, hips and backs of legs
- multiple bruises in clusters, usually on the upper arms or outer thighs
- bruising which looks like it has been caused by fingers, a hand or an object, like belt or shoe
- large oval-shaped bite marks.

Burns or scalds:

- any burns which have a clear shape of an object, for example cigarette burns
- burns to the backs of hands, feet, legs, genitals or buttocks.

Other signs of physical abuse include multiple injuries (such as bruising, fractures) inflicted at different times. If a child is frequently injured, and if the bruises or injuries are unexplained or the explanation doesn't match the injury, this should be investigated. It's also concerning if there is a delay in seeking medical help for a child who has been injured.

1.4 **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. There aren't usually any obvious physical signs of emotional abuse but there may be changes in a child's actions or emotions. Some children are naturally quiet and self-contained whilst others are more open and affectionate. Mood swings and challenging behaviour are also a normal part of growing up for teenagers and children going through puberty. Be alert to behaviours which appear to be out of character for the individual child or are particularly unusual for their stage of development. Older children may:

- use language, act in a way or know about things that you wouldn't expect for their age
- struggle to control strong emotions or have extreme outbursts
- seem isolated from their parents
- lack social skills or have few, if any, friends
- fear making mistakes
- fear their parent being approached regarding their behaviour
- self-harm.

1.5 **Sexual abuse:** Sexual abuse is forcing or enticing a child to take part in sexual activities. It doesn't necessarily involve violence, and the child may not be aware that what is happening is abuse.

Child sexual abuse can involve contact abuse and non-contact abuse.

Contact abuse happens when the abuser makes physical contact with the child. It includes:

- sexual touching of any part of the body whether the child is wearing clothes or not
- rape or penetration by putting an object or body part inside a child's mouth, vagina or anus
- forcing or encouraging a child to take part in sexual activity
- making a child take their clothes off or touch someone else's genitals.

Non-contact abuse involves non-touching activities. It can happen online or in person and includes:

- encouraging or forcing a child to watch or hear sexual acts
- making a child masturbate while others watch
- not taking proper measures to prevent a child being exposed to sexual activities by others
- showing pornography to a child
- making, viewing or distributing child abuse images
- allowing someone else to make, view or distribute child abuse images.
- meeting a child following online sexual grooming with the intent of abusing them.

Online sexual abuse includes:

- persuading or forcing a child to send or post sexually explicit images of themselves, this is sometimes referred to as sexting
- persuading or forcing a child to take part in sexual activities via a webcam or smartphone
- having sexual conversations with a child by text or online.

Abusers may threaten to send sexually explicit images, video or copies of sexual conversations to the young person's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the abuse has stopped.

Abusers will often try to build an emotional connection with a child in order to gain their trust for the purposes of sexual abuse. This is known as grooming.

There may be physical signs that a child has suffered sexual abuse.

These include:

- anal or vaginal soreness or itching
- bruising or bleeding near the genital area
- discomfort when walking or sitting down
- an unusual discharge
- sexually transmitted infections (STI)
- pregnancy.

Changes in the child's mood or behaviour may also cause concern. They may want to avoid spending time with specific people. In particular, the child may show sexual behaviour that is inappropriate for their age.

For example:

- they could use sexual language or know things about sex that you wouldn't expect them to
- they might become sexually active or pregnant at a young age.

1.6 **Neglect:**

Neglect is not meeting a child's basic physical and/or psychological needs. This can result in serious damage to their health and development. Neglect may involve a parent or carer not:

- providing adequate food, clothing or shelter
- supervising a child or keeping them safe from harm or danger (including leaving them with unsuitable carers)
- making sure the child receives appropriate health and/or dental care
- making sure the child receives a suitable education
- meeting the child's basic emotional needs – this is known as emotional neglect.

Neglect is the most common type of child abuse. It often happens at the same time as other types of abuse. Neglect can be difficult to identify. Isolated signs may not mean that a child is suffering neglect, but multiple and persistent signs over time could indicate a serious problem. Some of these signs include:

- children who appear hungry - they may not have lunch money or even try to steal food
- children being absent from education for prolonged periods and/or on repeated occasions
- children who appear dirty or smelly
- children whose clothes are inadequate for the weather conditions
- children who are left alone or unsupervised for long periods or at a young age
- children who have untreated injuries, health or dental problems
- children with poor language, communication or social skills for their stage of development
- children who live in an unsuitable home environment.

SIGNS OF ABUSE

1.7 Possible signs of abuse include, but are not limited to:

- 1.7.1 the pupil says she has been abused or asks a question or makes a comment which gives rise to that inference;
 - 1.7.2 there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;
 - 1.7.3 the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour;
 - 1.7.4 the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
 - 1.7.5 the pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general well-being;
 - 1.7.6 the pupil appears neglected, eg dirty, hungry, inadequately clothed;
 - 1.7.7 the pupil is reluctant to go home, or has been openly rejected by her parents or carers; and
 - 1.7.8 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.
- 1.8 The Gloucestershire Safeguarding Children's Partnership and Gloucestershire Safeguarding Education Partnership can provide advice on the signs of abuse and the DfE advice What to do if you're worried a child is being abused (March 2015) provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice.

2 MENTAL HEALTH

- 2.1. All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- 2.2 Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, by speaking to the designated safeguarding lead or a deputy.
- 2.3 Further advice can be found in the DofE published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools.
- 2.4 College has a separate Mental Health Policy which details how Mental Health concerns are identified and supported.

3 SPECIFIC SAFEGUARDING ISSUES

- 3.1 Statutory guidance acknowledges the following as specific safeguarding issues:
- 3.1.1 children and the court system;
 - 3.1.2 children missing from education (see section 4 below);
 - 3.1.3 children with family members in prison;
 - 3.1.4 child sexual exploitation (see section 5 below);
 - 3.1.5 child criminal exploitation: county lines;
 - 3.1.6 domestic abuse;
 - 3.1.7 homelessness;
 - 3.1.8 so-called 'honour-based' abuse (see sections 7,8 and 9 below);
 - 3.1.9 preventing radicalisation (see section 10 below);
 - 3.1.10 child on child abuse (see section 11 below);
 - 3.1.11 sexual violence and sexual harassment between children in schools and colleges (see section 12 below).
 - 3.1.12 Child abduction and community safety incidents
 - 3.1.13 Modern Slavery and the National Referral Mechanism
 - 3.1.14 Cybercrime (see also Online Safety Policy)
- 3.2 Further advice and links to guidance on these specific safeguarding issues can be found in Annex A of KCSIE 2025. Staff should be particularly aware of the safeguarding issues set out below.

4 CHILDREN WHO ARE ABSENT FROM EDUCATION

- 4.1 Children going missing or being absent, repeatedly from education, can act as a vital warning sign of a range of safeguarding possibilities. Particular concern should be for unexplainable and/or persistent absences. College attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this policy if any absence of a pupil from College gives rise to a concern about her welfare.
- 4.2 Where reasonably possible College will hold more than one emergency contact for each pupil.
- 4.3 College shall inform the local authority of any pupil who is going to be added to or deleted from the College admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended) and Working Together to Improve School Attendance 2024
- 4.4 This will assist the local authority to:
- 4.4.1 fulfil its duty to identify children of compulsory school age who are missing from education; and
 - 4.4.2 follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, radicalisation or involvement with serious violent crime.
- 4.5 College shall inform the local authority of any pupil who:
- 4.5.1 fails to attend College regularly; or

4.5.2 has been absent without College permission for a continuous period of ten school days or more, at such intervals as are agreed between College and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

5 CHILD SEXUAL EXPLOITATION (CSE)

5.1 Child sexual exploitation (CSE) is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

5.1.1 in exchange for something the victim needs or wants; and / or

5.1.2 for the financial advantage or increased status of the perpetrator or facilitator.

5.2 The victim may have been sexually exploited even if the sexual activity appears consensual. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship

5.3 Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology or non-contact activities. These include involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. Some of the following signs may be indicators of child sexual abuse, including children who:

5.3.1 appear with unexplained gifts or new possessions;

5.3.2 associate with other young people involved in exploitation;

5.3.3 have older boyfriends or girlfriends;

5.3.4 suffer from sexually transmitted infections or become pregnant;

5.3.5 suffer from changes in emotional well-being;

5.3.6 misuse drugs and alcohol;

5.3.7 go missing for periods of time or regularly come home late; and

5.3.8 regularly miss school or education or do not take part in education.

6 CHILD CRIMINAL EXPLOITATION (CCE):

6.1 CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

6.2 6.2.1 in exchange for something the victim needs or wants, and/or

6.2.2 for the financial or other advantage of the perpetrator or facilitator and/or

6.2.3 through violence or the threat of violence.

6.3 CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country,

forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE:

- 6.3.1 children who appear with unexplained gifts or new possessions;
- 6.3.2 children who associate with other young people involved in exploitation;
- 6.3.3 children who suffer from changes in emotional well-being;
- 6.3.4 children who misuse drugs and alcohol;
- 6.3.5 children who go missing for periods of time or regularly come home late;
- 6.3.6 children who regularly miss school or education or do not take part in education.

6.4 As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

6.5 Children being criminally exploited may be at higher risk of sexual exploitation.

7 SERIOUS VIOLENCE

7.1 All staff should be aware of indicators, which may signal that children are at risk from, or involved in violent crime. These may include:

- 7.1.1 increased absence from school
- 7.1.2 change in relationships with older individuals or groups
- 7.1.3 significant decline in performance
- 7.1.4 signs of self-harm or a significant change in wellbeing
- 7.1.5 signs of assault or unexplained injuries
- 7.1.6 unexplained gifts or new possessions.

7.2 All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

8 COUNTY LINES

8.1 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move drugs and money.

8.2 One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school). If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

9 HONOUR-BASED ABUSE

- 9.1 Honour-based abuse commonly takes the form of violence. All forms of so-called honour-based violence are abuse (regardless of motivation) and should be handled and escalated as such. Abuse committed in the context of preserving "honour" often involves additional risk factors such as a wider network of family or community pressure and the possibility of multiple perpetrators which should be taken into account when deciding what safeguarding action to take. Staff should speak to the DSL if they have any doubts.
- 9.2 If appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

10 DOMESTIC ABUSE

- 10.1 All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- 10.2 Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn

11 FEMALE GENITAL MUTILATION (FGM)

- 11.1 FGM is a form of Honour Based Abuse. It comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences.
- 11.2 There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi-agency statutory guidance on FGM (HM Government, April 2016) (pages 59-61 focus on the role of schools).
- 11.3 All staff must be aware of the requirement for 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. The report should be made orally by calling 101, the single non-emergency number. 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. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

- 11.4 If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance Mandatory reporting of female genital mutilation - procedural information (December 2016) for further details about the duty.
- 11.5 Guidance published by the Department for Health also provides useful information and support for health professionals which will be taken into account by College medical staff. The National FGM Centre has also produced FGM guidance to help schools understand their role in safeguarding girls, engaging parents and teaching about FGM.

12 FORCED MARRIAGE

- 12.1 Forced marriage is also a form of Honour-Based Abuse. Forcing a person into 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.
- 12.2 Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 13-14 of the Multi-agency guidelines: handling case of forced marriage (HM Government, June 2014).
- 12.3 Staff should speak to the DSL if they have any concerns. Pages 32-36 of the Multi-agency guidelines: handling case of forced marriage (HM Government, June 2014) focus on the role of schools in detecting and reporting forced marriage, and the Forced Marriage Unit can be contacted on 020 7008 0151 or fmufco.gov.uk for advice and information.

13 RADICALISATION AND THE PREVENT DUTY

- 13.1 College has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.
- 13.2 College aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. College is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist

ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

- 13.3 College has adopted the government's definitions for the purposes of compliance with the Prevent duty:
- 13.4 **Extremism:** *"vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas"*
- 13.5 **Radicalisation:** *"the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups."*
- 13.6 There is no single way of identifying an individual who is likely to be susceptible an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).
- 13.7 It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. College staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a referral to the Channel programme, having consulted Channel Duty Guidance; [link](#)
- 13.8 The DfE and Home Office's briefing note [The use of social media for online radicalisation \(July 2015\)](#) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

14 CHILD ON CHILD ABUSE

- 14.1 All staff should be aware that children can abuse other children (often referred to as child on child abuse). This can happen both inside and outside of college and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. If staff have any concerns regarding child on child abuse, they should speak to the designated safeguarding lead (or deputy).
- 14.2 All staff understand must challenge inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Safeguarding issues can manifest themselves via child on child abuse, which is most likely to include, but not be limited to:

- 14.2.1 Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
 - 14.2.2 Abuse in intimate personal relationships between peers;
 - 14.2.3 Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
 - 14.2.4 Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
 - 14.2.5 Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse; bullying (including cyber-bullying);
 - 14.2.6 Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
 - 14.2.7 Consensual and non-consensual sharing of nude and semi nude images and or videos;
 - 14.2.8 Upskirting, or downblousing which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
 - 14.2.9 Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- 14.3 Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment. College recognises that problematic, abusive and violent sexual behaviours are inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online and offline (both physical and verbal) and College recognises the gendered nature such behaviour can take. See also 15 below. Harmful sexual behaviour, like all child on child abuse, is never acceptable and will be taken seriously.
- 14.4 College takes steps to minimise the risk of all types of child-on-child abuse. College has robust anti-bullying procedures in place (see the College anti-bullying policy and anti-cyberbullying policy) and pupils are taught at all stages of College about acceptable behaviour and how to keep themselves safe. Risk assessments are carried out and kept under review. Appropriate action is taken to protect pupils identified as being at risk including risks arising from behaviour in boarding houses and the particular vulnerabilities of those with a special educational need or disability (see the College risk assessment policy for pupil welfare).
- 14.5 A bullying incident will be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm.

Abusive behaviour by pupils must be taken seriously. Behaviour should not be dismissed as being normal between young people, as "banter" or simply "part of growing up". Behaviour such as initiation violence or any form of sexual violence or sexual harassment is not acceptable.

15 SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN

- 15.1 Sexual violence and sexual harassment can occur between two or more children of any age or sex. They can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 15.2 Children who are victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physical and verbal) and are never acceptable. College will respond to allegations seriously and all victims will be offered appropriate support.
- 15.3 College is aware of the importance of:
- 15.3.1 making it clear to pupils that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
 - 15.3.2 not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "girls being girls"; and
 - 15.3.3 challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and committing / attempting to commit certain acts of voyeurism eg upskirting. Dismissing or tolerating such behaviours risks normalising them.
- 15.4 References to **sexual violence** are references to sexual offences under the Sexual Offences Act 2003, specifically rape, assault by penetration and sexual assault.
- 15.5 References to **sexual harassment** mean "unwanted conduct of a sexual nature" that can occur online and offline. In the context of child on child sexual harassment, it 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.
- 15.6 The DfE guidance [Sexual violence and sexual harassment between children in schools and colleges \(KCSIE 2024 Part 5\)](#) provides further detailed advice.

16 SERIOUS VIOLENCE

- 16.1 All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-

harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

- 16.2 All staff should be aware of risk factors which increase the likelihood of involvement in serious violence, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery

17 SEXTING

- 17.1 "Sexting" means the taking and sending or posting of images or videos of a sexual or indecent nature, usually through mobile picture messages or webcams over the internet. Making, possessing and distributing sexual photographs and videos of under 18s is illegal.
- 17.2 College treats all incidences of sexting as safeguarding matters to be actioned in accordance with this policy.
- 17.3 Members of staff should not view sexual imagery which is reported to them, or copy, print or share the images under any circumstances. In referring any incident of sexting, members of staff should describe the content of the images as reported to them.
- 17.4 The DSL may in exceptional circumstances view images with the prior approval of the Head of College and only where:
- 17.4.1 it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;
 - 17.4.2 it is necessary to report the image to a website or agency to have it taken down; or
 - 17.4.3 a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable.
- 17.5 Where viewing an image is unavoidable:
- 17.5.1 viewing should take place on College premises wherever possible;
 - 17.5.2 the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);
 - 17.5.3 a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;
 - 17.5.4 full details of the viewing must be recorded in the College safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;
 - 17.5.5 any member of staff who views an indecent image should be given appropriate support.
- 17.6 If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.
- 17.7 If an electronic device that is prohibited by College rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of

a child or an extreme pornographic image, the device will be given to the police.

- 17.8 If external agencies do not need to be involved, College must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.
- 17.9 If images have been shared online and cannot now be deleted by the person who shared them, College should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).
- 17.10 Where a pupil receives unwanted images, College should advise the pupil and her parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address.
- 17.11 The UK Council for Child Internet Safety's advice; [sexting in schools and colleges: responding to incidents and safeguarding young people \(2020\)](#) contains details of support agencies and provides further information for schools on how to respond to incidents of sexting.

18 UPSKIRTING

- 18.1 Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing parts of their clothing or body not otherwise visible to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- 18.2 Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence eg if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.
- 18.3 The College will treat incidences of upskirting as a breach of discipline and also as a safeguarding matter under the College's child protection procedures
- 18.4 All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to sexting.

19 SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

- 19.1 College welcomes pupils with special educational needs and disabilities and will do all that is reasonable to ensure that the College curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See College policy on learning support and the inclusion and access policy.
- 19.2 Additional barriers can exist when detecting the abuse or neglect of pupils with a special educational need or disability creating additional safeguarding

challenges for those involved in safeguarding and promoting the welfare of this group of children. College is mindful in particular that:

- 19.2.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's special educational need or disability without further exploration;
- 19.2.2 pupils with a special education need or disability can be disproportionately impacted by bullying without outwardly showing any signs; and
- 19.2.3 there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

20 LOOKED AFTER CHILDREN AND PREVIOUSLY LOOKED AFTER CHILDREN

- 20.1 College will ensure that staff have the skills, knowledge and understanding to keep looked after children safe and the information they need in relation to a child's looked after legal status, for example:
 - 20.1.1 whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order;
 - 20.1.2 contact arrangements with birth parents or those with parental responsibility;
 - 20.1.3 information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after her.
- 20.2 The DSL maintains these details, including contact details of the child's social worker. See Appendix 4 for the DSL's role in relation to pupils who are looked after children.

21 CARE LEAVERS

- 21.1 The DSL maintains details of the local authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

22 CHILDREN AT POTENTIALLY GREATER RISK OF HARM

- 22.1 Children who need a social worker due to safeguarding or welfare needs. The local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's welfare and decisions about safeguarding.
- 22.2 Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. College has systems and processes in place for identifying possible mental health needs, and routes to escalate with clear referral and accountability systems.

Appendix 2: Concerns About A Child - Guidance For Staff

1 RECEIVING A DISCLOSURE

- 1.1 Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.
- 1.2 Do not ask leading questions, ie a question which suggests its own answer.
- 1.3 Reassure the pupil but not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken.
- 1.4 Keep a sufficient written record of the conversation (see 2 below), using full names, not initials, if possible. All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.
- 1.5 Pass on the record when reporting the concern in accordance with this policy.

2 RECORDING A CONCERN

- 2.1 Staff must record all concerns in writing and log them on CPOMS using the Safeguarding lozenge.
- 2.2 Records should be factual and signed and dated. Records should include:
 - 2.2.1 the pupil's details: name; date of birth; address and family details;
 - 2.2.2 date and time of the event / concern / conversation;
 - 2.2.3 the action taken and by whom;
 - 2.2.4 the name and position of the person making the record.
- 2.3 College has a pro forma record on CPOMS and can be completed after an initial discussion with the DSL and completed with the DSL where appropriate.

3 RECEIVING A REPORT OF HARMFUL SEXUAL BEHAVIOUR

- 3.1 Additional guidance about how to manage a report of harmful sexual behaviour is provided in Part 5 KCSIE. This includes the following advice:
 - 3.1.1 Only record the facts as the child presents them.
 - 3.1.2 Where the report includes an online element, do not view or forward illegal images of a child. See paragraph 11 of Appendix 1 above and the UK Council for Child Internet Safety's advice note Sexting in schools and colleges: responding to incidents and safeguarding young people for advice about what to do when viewing an image is unavoidable.
 - 3.1.3 Manage reports with another member of staff present (preferably the DSL or DDSL), if possible.
 - 3.1.4 Inform the DSL as soon as practically possible if the DSL is not involved in the initial report.

4. USE OF REASONABLE FORCE

- 4.1 There are circumstances when it would be appropriate for staff to use reasonable force to safeguard pupils. 'Reasonable' in these circumstances means using no more force than is needed.
- 4.2 Staff should refer to the physical interventions and positive handling policy and the staff code of conduct for more detailed guidance about the use of reasonable force.

Appendix 3: Low Level Concerns and dealing with allegations against staff

1 COLLEGE PROCEDURES

- 1.1 College procedures for dealing with allegations made against staff will be used where the member of staff has:
 - 1.1.1 behaved in a way that has harmed a child, or may have harmed a child;
 - 1.1.2 possibly committed a criminal offence against or related to a child; or
 - 1.1.3 behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she work regularly or closely with children.
 - 1.1.4 behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 1.2 Any allegations not meeting these criteria will be dealt with in accordance with the Gloucestershire Safeguarding Children's Partnership and Gloucestershire Safeguarding Education Partnership procedures. Advice from the Designated Officer (LADO) will be sought in borderline cases, and guidance from part four of KCSIE (2025) will be followed.
- 1.3 All such allegations involving one or more of these criteria in paragraph 1.1 above must be dealt with as a priority without delay.
- 1.4 Allegations against an individual not directly employed by College, for example a supply teacher, will be dealt with by following KCSIE guidance and liaising with the LADO to determine a suitable outcome.
- 1.5 The local authority has designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children (Designated Officer(s)). The Designated Officer(s) will be informed immediately and in any event within one working day of all allegations that come to the College's attention and appear to meet the criteria in paragraph 1.1 above.
- 1.6 Allegations against a teacher who is no longer teaching, and historical allegations will be referred to the police.

2 REPORTING AN ALLEGATION

- 2.1 Where an allegation or complaint is made against any member of staff (other than the Executive Principal or the Head of College), including the DSL, the matter should be reported immediately to the Head of College. The Head of College will discuss the allegation immediately with the Designated Officer(s) before further action is taken. Where appropriate, the Head of College will consult with the DSL.
- 2.2 Where an allegation or complaint is made against the Executive Principal or Head of College, the matter should be reported immediately to the Chair of Council or the Nominated Safeguarding Council Member, without first notifying the Executive Principal/Head of College. The Chair of Council will discuss the allegation immediately with the Designated Officer(s) before

further action is taken. The Chair of Council will consult the Nominated Safeguarding Council Member, and vice versa.

- 2.3 Where an allegation is made against any Member of Council, the matter should be reported immediately to the Chair of Council or the Nominated Safeguarding Council Member. If either the Chair of Council or the Nominated Safeguarding Council Member are the subject of an allegation, the matter should be reported to the other. The allegation will be discussed immediately with the Designated Officer(s) before further action is taken. Where appropriate, the Chair of Council will consult the Nominated Safeguarding Council Member, and vice versa.
- 2.4 If it is not possible to report to the Head of College or Chair of Council or Nominated Safeguarding Council Member in the circumstances set out above, a report should be made immediately to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the Head of College or, where appropriate, the Chair of Council and the Nominated Safeguarding Council Member.
- 2.5 The person taking action in accordance with the procedures in this Appendix is known as the **Case Manager**.

3 LOW-LEVEL CONCERNS

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for allegations set out at the start of this appendix. A low-level concern is any concern, no matter how small, that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

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

Low-level concerns about a member of staff can be shared initially with the DSL or reported directly to the Head of College as outlined in part 2 of this appendix. The DSL should inform the Head of College of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern. The Head of College is the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns the Head of College may wish to consult with the DSL and take a more collaborative decision-making approach.

College aims to create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection

they believe they have behaved in such a way that they consider falls below the expected professional standards.

In addition to the Staff Code of Conduct, College has 'Relationships between Adults and Pupils in College Guidelines' which outline the expectations for staff behaviour and conduct.

If the concern has been raised via a third party, the Head of College should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken.

Low-level concerns which are shared about supply staff and contractors should also be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

Recording Low-Level Concerns;

All low-level concerns should be recorded in CPOMS in the 'Staff Safe' section by the DSL. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified; if this is the case College should decide on an appropriate course of action.

4 DISCLOSURE OF INFORMATION

The Case Manager will inform the accused person of the allegation as soon as possible after the Designated Officer(s) has been consulted.

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

Where the Designated Officer(s) advises that a strategy discussion is needed, or the police or children's social care need to be involved, the Case Manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

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

5 FURTHER ACTION TO BE TAKEN BY THE COLLEGE

A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. College will take action in accordance with Part 4 of KCSIE and the College's employment procedures.

Where a member of boarding staff is suspended pending an investigation of a child protection nature, arrangements for alternative accommodation away from children will be made for the member of staff.

6 CEASING TO USE STAFF

If College ceases to use the services of a member of staff because they are unsuitable to work with children, a settlement agreement will not be used and a referral to the Disclosure and Barring Service (**DBS**) will be made promptly if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within College, with a report being presented to the Proprietor without delay. College may also need to consider a referral to the DBS if a member of staff is suspended or deployed to another area of work that is not regulated activity.

If a member of staff tenders his or her resignation, or ceases to provide his or her services at a time when child protection concerns exist in relation to that person, those concerns will still be followed up by College in accordance with this policy and a referral to the DBS will be made promptly if the criteria for referral are met.

Separate consideration will be given as to whether a referral to the Teaching Regulation Agency (**TRA**) should be made where a teacher has been dismissed, or would have been dismissed had he / she not resigned, because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence. An interim referral to the TRA may also be considered and made if appropriate.

7 MALICIOUS ALLEGATIONS

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head of College will consider whether to take disciplinary action in accordance with the College Behaviour and Discipline Policy.

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

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

8 RECORD KEEPING

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

For all other allegations, full details will be recorded on the confidential personnel file of the person accused.

An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references. In accordance with KCSIE, a history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

College will retain all safeguarding records and relevant personnel records for so long as reasonably required.

Appendix 4: Responsibilities of the Designated Safeguarding Lead (DSL)

- 1 The name and contact details of the DSL and Deputy DSLs are set out in the contacts list at the front of this policy.
- 2 In accordance with Annex B of KCSIE, the main responsibilities of the DSL are:
- 3 **MANAGING REFERRALS**
 - 3.1 The DSL is expected to:
 - 3.1.1 refer cases of suspected abuse to the local authority children's social care as required;
 - 3.1.2 support staff who make referrals to the local authority children's social care;
 - 3.1.3 refer cases to the Channel programme where there is a radicalisation concern as required;
 - 3.1.4 support staff who make referrals to the Channel programme;
 - 3.1.5 refer cases where a person is dismissed or has left due to risk / harm to a child to the Disclosure and Barring Service (**DBS**) as required; and
 - 3.1.6 refer cases where a crime may have been committed to the police as required.
- 4 **WORK WITH OTHERS**
 - 4.1 The DSL is expected to:
 - 4.1.1 act as a point of contact with the three safeguarding partners;
 - 4.1.2 liaise with the Principal to inform her of issues especially ongoing enquiries under section 47 of the *Children Act 1989* and police investigations;
 - 4.1.3 as required, liaise with the Case Manager (see 0Appendix 3 - 2.1 and following) of this policy) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
 - 4.1.4 liaise with staff (especially pastoral support staff, College nurses, IT technicians and SENCOs / named person with oversight for SEN) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
 - 4.1.5 act as a source of support, advice and expertise for staff.
- 5 **RAISE AWARENESS**
 - 5.1 The DSL should:
 - 5.1.1 ensure College child protection and safeguarding policies and processes are known, understood and used appropriately;

- 5.1.2 ensure this policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Proprietor regarding this;
- 5.1.3 ensure this policy is available publicly and parents are aware that referrals about suspected abuse or neglect may be made and the role of College in this;
- 5.1.4 link with the Gloucestershire Safeguarding Children's Partnership and Gloucestershire Safeguarding Education Partnership to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

6 CHILD PROTECTION FILE

- 6.1 Where children leave College the DSL shall ensure their child protection file is transferred to any new school or college as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt will be obtained.
- 6.2 In addition, the DSL will consider if it is appropriate to share any information with the new school or college in advance of a child leaving.
- 6.3 On receiving a child protection file, the DSL will ensure that key staff are aware as required, including the SENCO / named person with oversight for SEN.

7 PREVENT

- 7.1 In accordance with the Prevent duty guidance for England and Wales and Channel duty guidance: protecting vulnerable people from being drawn into terrorism (HM Government, July 2015) the DSL has, in addition, the following responsibilities:
 - 7.1.1 acting as the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty;
 - 7.1.2 co-ordinating Prevent duty procedures in the College;
 - 7.1.3 liaising with local prevent co-ordinators, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and / or the police where indicated;
 - 7.1.4 undergoing WRAP or other appropriate training;
 - 7.1.5 maintaining ongoing training programme for all College employees including induction training for all new employees and keeping records of staff training; and
 - 7.1.6 monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty.

8 LOOKED AFTER CHILDREN

- 8.1 The DSL will, where applicable, take lead responsibility for pupils who are looked after children.

9 TRAINING

- 9.1 The DSL and the Deputy DSL have undertaken training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent duty awareness training and will be updated at least every two years. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- 9.1.1 understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- 9.1.2 have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- 9.1.3 ensure each member of staff has access to and understands the College child protection and safeguarding policy and procedures, especially new and part-time staff;
- 9.1.4 are alert to the specific needs of children in need, those with special educational needs and young carers;
- 9.1.5 understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- 9.1.6 understand the importance of information sharing, both within College, and with the Gloucestershire Safeguarding Children's Partnership and Gloucestershire Safeguarding Education Partnership, other agencies, organisations and practitioners;
- 9.1.7 are able to keep detailed, accurate, secure written records of concerns and referrals;
- 9.1.8 understand and support College with regard to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- 9.1.9 are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at College;
- 9.1.10 can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- 9.1.11 obtain access to resources and attend any relevant or refresher training courses;
- 9.1.12 encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures College may put in place to protect them; and
- 9.1.13 are able to take lead responsibility for pupils who are looked after children.

10 HUMAN RIGHTS

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them. Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

11 EQUALITY ACT

Schools and colleges have obligations under the Equality Act 2010. College must not unlawfully discriminate against a pupil on the grounds of a protective characteristic. In the context of safeguarding, this guidance, and the legal duties placed on and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow Colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need.

Appendix 5: The Role of the Nominated Safeguarding Council Member (NSCM):

1 OVERVIEW

- 1.1 Members of Council acknowledge and understand that they have collective duties and responsibilities to safeguard and promote the welfare of children and to ensure that College safeguarding policies, procedures and training are effective and comply with the law at all times.
- 1.2 Council is determined to promote the well-being of children within the College's care and recognises that well-being extends beyond the protection from harm and neglect into areas such as promoting:
 - 1.2.1 physical and mental health and emotional well-being;
 - 1.2.2 social and economic well-being;
 - 1.2.3 opportunities for education, training and recreation; and
 - 1.2.4 opportunities for contributing to society.
- 1.3 Council has nominated one of its members to champion best safeguarding practice in College, supporting Council not just to discharge its duties under legislation and guidance but to move beyond regulatory compliance. The NSCM will:
 - 1.3.1 support Council in its commitment to promote the well-being of children within the College's care; and
 - 1.3.2 take leadership of College safeguarding arrangements, liaising with external agencies where this is required.
- 1.4 The appointment of the NSCM on the terms set out below forms part of the Council's acceptance of and response to its duties, not a delegation or abrogation of them.

2 STATUTORY GUIDANCE

- 2.1 Statutory guidance Keeping children safe in education (KCSIE) defines safeguarding and promoting the welfare of children as:
 - 2.1.1 protecting children from maltreatment;
 - 2.1.2 preventing impairment of children's health or development;
 - 2.1.3 ensuring children are growing up in circumstances consistent with the provision of safe and effective care; and
 - 2.1.4 taking action to enable all children to have the best outcomes.
- 2.2 KCSIE also requires schools to have a senior board level (or equivalent) lead to take leadership responsibility for the organisation's safeguarding arrangements.
- 2.3 Statutory guidance Working Together to Safeguard Children requires a wide range of institutions, including independent schools, to have arrangements in place that reflect the importance of safeguarding and promoting the welfare of children, including:

- 2.3.1 a clear line of accountability for the provision of services designed to safeguard and promote the welfare of children;
 - 2.3.2 a senior board level lead to take leadership responsibility for the organisation's safeguarding arrangements;
 - 2.3.3 a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and the development of services;
 - 2.3.4 clear whistleblowing procedures, suitably referenced in staff training and codes of conduct, and a culture that enables issues about safeguarding and promoting the welfare of children to be addressed;
 - 2.3.5 arrangements which set out clearly the processes for sharing information, with other professionals and with the Gloucestershire Safeguarding Children's Partnership / Gloucestershire Safeguarding Education Partnership
 - 2.3.6 a designated professional lead for safeguarding;
 - 2.3.7 safe recruitment practices for individuals whom the organisation will permit to work regularly with children, including policies on when to obtain a criminal record check;
 - 2.3.8 appropriate supervision and support for staff, including undertaking safeguarding training; and
 - 2.3.9 clear policies in line with those from the Gloucestershire Safeguarding Children's Partnership / Gloucestershire Safeguarding Education Partnership for dealing with allegations against people who work with children.
- 2.4 Other statutory guidance emphasises the wide-ranging nature of safeguarding issues and the need to promote pupil well-being. Guidance includes:
- 2.4.1 Revised Prevent Duty Guidance for England and Wales, which emphasises that the duty to have due regard to the need to prevent children from being drawn into terrorism is an aspect of safeguarding. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit;
 - 2.4.2 Multi-agency statutory guidance on female genital mutilation, which emphasises that cases of FGM should be dealt with as part of existing structures, policies and procedures on child protection and safeguarding. It highlights the new criminal offence of failing to protect a girl from the risk of FGM and the mandatory reporting duty on all teachers in England and Wales to report known cases of FGM in under 18s which they identify in the course of their professional work to the police;
 - 2.4.3 Disqualification under the Childcare Act 2006 (2016)
 - 2.4.4 Special educational needs and disability code of practice: 0 to 25 years (2015) (statutory guidance only for independent schools and independent specialist providers approved under section 41 of the Children and Families Act 2014 and independent schools with early years provision).

3 ROLE AND DUTIES

- 3.1 The main role of the NSCM on behalf of Council (which retains overall responsibility) is to act as the College's senior board level lead to take leadership responsibility for College safeguarding arrangements, which he / she will do by discharging the following functions:
- 3.1.1 champion the promotion of well-being, safeguarding and child protection issues at the highest level within College;
 - 3.1.2 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;
 - 3.1.3 ensure that Council puts in place a suitable child protection and safeguarding policy and associated procedures, including whistleblowing, which have proper regard to prevailing regulations, guidance, standards and advice;
 - 3.1.4 be familiar with the Gloucestershire Safeguarding Children's Partnership / Gloucestershire Safeguarding Education Partnership guidance and procedures relating to safeguarding and child protection and associated issues, including local protocols for assessment and the Gloucestershire Safeguarding Children's Partnership / Gloucestershire Safeguarding Education Partnership threshold document, contributing to inter-agency working;
 - 3.1.5 contribute to ensuring any deficiencies in College safeguarding practices brought to Council's attention from any source are investigated and addressed;
 - 3.1.6 meet regularly with the College Designated Safeguarding Lead (DSL) in order to monitor the effectiveness of the College CPS Policy and procedures and the implementation of these across College. It is recommended that this is at least a termly meeting;
 - 3.1.7 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 annually (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;
 - 3.1.8 ensure that Council is made aware of any proven incident or allegation (anonymised where appropriate) which has implications for College CPS Policy or procedures;
 - 3.1.9 ensure that the DSL is part of the College senior leadership team, and has sufficient time and resources at his / her disposal to carry out his / her duties effectively;
 - 3.1.10 ensure that the DSL (and Deputy DSL, if appointed) 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;
 - 3.1.12 ensure that arrangements are in place for the inclusion of child protection training on College procedures in an induction programme for all people working in College, no matter for how long, nor the status of that individual;

- 3.1.13 ensure that College makes opportunities available to staff to feed into and shape the College approach to safeguarding and safeguarding policies;
 - 3.1.14 ensure safer recruitment procedures are in place and implemented with appropriate checks undertaken on all new staff, Members of Council, volunteers and others working at College;
 - 3.1.15 review the College Single Central Register on at least 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;
 - 3.1.16 consider, with the Head of College and DSL, any child protection concerns arising out of staff appraisals or exit interviews;
 - 3.1.17 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;
 - 3.1.18 ensure that appropriate IT filters and monitoring systems are in place to prevent children from accessing harmful or inappropriate material;
 - 3.1.19 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;
 - 3.1.20 ensure that Council carries out regular risk assessments of factors particular to the College which have a bearing on the profile of particular well-being and safeguarding issues, such as (without limitation) 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
 - 3.1.21 both provide to, and seek from, the local authority and other relevant agencies information about how Council's duties in respect of safeguarding and child protection have been discharged, where appropriate or requested.
- 3.2 The identity of and contact details for the NSCM, together with an outline of his / her duties, will be publicised widely within the College community to ensure that pupils, parents, staff and Members of Council understand the purpose and importance of the role.
- 3.3 To the extent that the role and duties of the NSCM conflict with those assumed by others within the School, including the Chair 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.
- 3.4 Each of the NSCM and the Chair of Council will undertake appropriate training in accordance with the Gloucestershire Safeguarding Children's Partnership / Gloucestershire Safeguarding Education Partnership recommendations to fulfil their respective role and duties.
- 3.5 The NSCM and Chair of Council should ensure that all governors and trustees receive appropriate safeguarding and child protection (including

online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

4 ALLEGATIONS AGAINST STAFF

- 4.1 The College CPS Policy sets out the detail of who is responsible for liaising with the local authority designated officer(s) in the event of allegations of abuse made against the Head of College, Executive Principal, proprietor, Member of Council or member of staff of College.
- 4.2 Where the NSCM is responsible for taking the lead in liaising with the local authority and / or other partner agencies, he / she will:
 - 4.2.1 notify the designated officer of the local authority immediately (and at least within one day) before any action is taken;
 - 4.2.2 ensure, with local authority support, that appropriate action is taken in accordance with agreed Gloucestershire Safeguarding Children's Partnership / Gloucestershire Safeguarding Education Partnership procedures;
 - 4.2.3 attend initial and subsequent strategy meetings as required if other agencies are involved;
 - 4.2.4 oversee an investigation under the College's internal employment procedures when the other agencies' involvement is at an end or as soon as it is confirmed that this may take place;
 - 4.2.5 with the DSL, ensure that all relevant referrals are made to external agencies; and
 - 4.2.6 with the DSL, review the College CPS Policy and procedures, taking advice from the designated officer of the local authority, and making the necessary changes.
- 4.3 At the conclusion of a case in which an allegation is substantiated, the NSCM will conduct a review of the circumstances of the case seeking appropriate input from within and outside College to determine whether there are any improvements to be made to College procedures or practice to help prevent similar events in the future. The NSCM will ensure that a full report is available for Council.

5 APPOINTMENT OF NOMINATED SAFEGUARDING COUNCIL MEMBER

- 5.1 The NSCM is David Fotheringham and can be contacted in the following ways: telephone number via the Clerk to the Council 01242 690 445 or ext 2401 and email via fotheringhamd@cheltladiescollege.org.
- 5.2 If the NSCM is unavailable his / her role and duties will be carried out by the Chair of Council.
- 5.3 The appointment of the NSCM has been made by the Governing Body after full consideration of the roles and responsibilities and the qualities required by potential candidates to discharge them effectively.

Appendix 6: Local arrangements

Gloucestershire's arrangements under Working Together to Safeguard Children 2023 are set out in Gloucestershire multi-agency arrangements to safeguard children see links:

<https://www.gloucestershire.gov.uk/gscp/>

<https://www.proceduresonline.com/swcpp/gloucestershire/index.html>

Appendix 7: Safeguarding for Visitors and Visitors to Boarding Houses Leaflets

CHILD PROTECTION CONTACTS

DESIGNATED SAFEGUARDING LEAD (DSL)

Caroline Ralph (Head of Pastoral Care)
07974 766320
ralphcj@cheltladiescollege.org

DEPUTY DESIGNATED SAFEGUARDING LEADS

Richard Dodds (Head of LC1 and LC2) 07538 129293
doddsr@cheltladiescollege.org

Jill Hill (Head of Health and Welfare)
07795 604031
hillj@cheltladiescollege.org

Jo Wintle (Assistant Head Pastoral)
07742 066804
wintlej@cheltladiescollege.org

Will Parker (Director of Sport and Physical Activity)
01242 707026
parkerw@cheltladiescollege.org

Aya Yuasa (Head of Learning Support)
01242 520691
yuasaa@cheltladiescollege.org

GLOUCESTERSHIRE SAFEGUARDING CHILDREN PARTNERSHIP (GSCP)
01452 426565
childrenshelpdesk@gloucestershire.gov.uk

COLLEGE SECURITY

07789 225020
security@cheltladiescollege.org

Further information and guidance is available in the College Visitors' and Volunteers' Policy, which is available on request.



CHELTENHAM LADIES' COLLEGE

SAFEGUARDING CHILDREN

Guidance for adults visiting or working temporarily at Cheltenham Ladies' College

OUR COMMITMENT TO SAFEGUARDING

Adults visiting or working at Cheltenham Ladies' College play an important part in the life of College, whether it is enriching the education of the pupils as a visiting speaker or in maintaining our buildings or grounds.

We can all play a part in keeping the pupils in College safe whilst working or visiting College. This is whether you are directly employed by College or are visiting as a guest or a visiting contractor.

It is important that we all take steps to keep ourselves safe. Our actions can sometimes be perceived in a way that was not intended. College wants to promote safe working practices for everyone on the College site, whatever your job or reason to be here.

To keep yourself safe from possible allegations, please follow this advice.

DON'T...

- Instigate verbal or physical contact with students (this applies both on and off the site) unless it is appropriate and part of your agreed reason to visit.
- Respond to verbal or physical contact from pupils. If this occurs, or you have any other concerns about pupil behaviour then report it immediately to the member of College staff who is responsible for your visit or a member of the College Security team.
- Give personal information to any pupil; for **example** your name, address, mobile phone number or email address.
- Accept or respond to a pupil attempting to give **you** personal information; for **example** their mobile phone number or a social media invitation.
- Accept physical or verbal abuse from a pupil. Do not respond **yourself**, but report it to a member of College staff.

DO...

- Be aware that verbal interaction with pupils may be interpreted by them as being offensive or inappropriate, even if this was not your intention.
- Report any unacceptable behaviour from a pupil.
- Be aware that contact made outside Cheltenham Ladies' College grounds with a pupil may also be considered inappropriate by that individual and could lead to your interaction being misinterpreted.

CHILD PROTECTION

Adults working around or with young people and children must be aware of the risk of abuse by adults or other young people.

At Cheltenham Ladies' College we believe that all pupils have the right to be safeguarded from harm, radicalisation and exploitation regardless of:

- Race, religion, preferred language or ethnicity.
- Age, gender, sexuality or disability.

If you have any concerns about a young person's safety during the course of your visit to Cheltenham Ladies' College:

- Immediately inform the Designated Safeguarding Lead (DSL).
- Write careful notes about what you have heard, witnessed or been told. Sign, time and date all notes.

If you suspect abuse, a young person confides in you, or a complaint is made to you about any adult or about yourself, it is your duty to report the concern. Likewise, if you perceive that any young person is at risk, inform the DSL immediately.

VISITORS TO BOARDING HOUSES



OUR COMMITMENT TO SAFEGUARDING

Cheltenham Ladies' College boarding houses are a home both for the pupils and for the Houseparents and staff who work there. As such, it is vital that the houses are safe for the pupils, for the staff, and for their visitors.

All adults who work and visit College can all play a part in keeping the pupils safe, whether employed here or visiting. It is also important that we take steps to keep ourselves safe, remembering that our actions can sometimes be perceived in a way that was not intended.

Overleaf you will find contact details for the Designated Safeguarding Lead team and [24 Hour College Security](#) team.

Please follow this advice:

- Remember that although you are visiting a friend or family member, you are also visiting a working boarding house and must abide by these guidelines
- Ensure that your host and/or the house staff on duty (if your host is out) are aware of your visit
- Maintain appropriate boundaries while you are visiting the boarding house, staying within staff accommodation at all times. Understand that you will need to be accompanied if you need to walk through the house to enter/leave the boarding house
- If you are alone in the staff accommodation (for example, baby-sitting), ensure that the door to the main House is locked, *unless this poses a fire risk*
- If the fire or intruder alarms sound, please follow directions given by House staff
- Do not instigate verbal or physical contact with pupils. Verbal interaction with pupils could be interpreted by them as being offensive or inappropriate, even if this was not your intention
- Do not give personal information to any pupil, for example your name or contact details. Also, do not accept or respond to a pupil attempting to give you their personal information, contact details or social media profile
- Report any unacceptable behaviour from a pupil to a member of House staff or to the DSL team
- Be aware that contact made outside Cheltenham Ladies' College grounds with a pupil may also be considered inappropriate by that individual and could lead to your interaction being misinterpreted

CHILD PROTECTION

Adults working around or with young people and children must be aware of the risk of abuse by adults or other young people. At Cheltenham Ladies' College we believe that all pupils have the right to be safeguarded from harm, radicalisation and exploitation regardless of:

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- Age, gender, sexuality or disability.

If you have any concerns about a young person's safety during the course of your visit to Cheltenham Ladies' College:

- Immediately inform the Designated Safeguarding Lead
- Write careful notes about what you have heard, witnessed or been told. Sign, time and date all notes.

If you suspect abuse, a young person confides in you, or complaint is made to you about any adult or about yourself, it is your duty to report the concern. Likewise, if you perceive that any young person is at risk, inform the DSL immediately.

BOARDING HOUSE CONTACTS

Main House telephone number 01242 + House number

CHILD PROTECTION CONTACTS

DESIGNATED SAFEGUARDING LEAD (DSL)

Caroline Ralph (Head of Pastoral Care) 07974 766320
ralphcj@cheltladiescollege.org

DEPUTY DESIGNATED SAFEGUARDING LEADS

Richard Dodds (Head of LC1&2) 07538 129293
doddsr@cheltladiescollege.org

Jill Hill (Head of Health and Welfare) 07795 604031
hillj@cheltladiescollege.org

Jo Wintle (Assistant Head Pastoral) 07742 066804
wintlej@cheltladiescollege.org

Will Parker (Director of Sport) 01242 707026
parkerw@cheltladiescollege.org

Aya Yuasa (Head of Learning Support) 01242 520691
yuasaa@cheltladiescollege.org

COLLEGE SECURITY 07789 225020
security@cheltladiescollege.org

GLOUCESTERSHIRE SAFEGUARDING CHILDREN'S PARTNERSHIP (GSCP)

01452 426565
childrenshelpdesk@gloucestershire.gov.uk



Appendix 8: Government Guidance and Advice – links to information

Document	Link
KCSIE 2025	https://www.gov.uk/government/publications/keeping-children-safe-in-education--2
Working Together to Safeguarding Children (HM Government, July 2023) (WTSC)	2023 Working together to safeguard children 2023: statutory guidance (publishing.service.gov.uk)
Disqualification under the Childcare Act 2006 (DfE, 31 August 2018);	https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006
Prevent Duty Guidance for England and Wales (HM Government, updated March 2024);	https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales
Channel duty guidance (last update 2025)	https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance
<u>Educate Against Hate</u> (HM Government 2018)	https://www.educateagainsthate.com/
Multi-agency statutory guidance on female genital mutilation (HM Government, April 2016)	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1016817/6.7166_HO_FBIS_BN_O__Leaflet_A4_FINAL_080321_WEB.pdf
What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015)	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf
Centre of Expertise on Child Sexual Abuse – education specific landing page	https://www.csacentre.org.uk/research-resources/practice-resources/helping-education-settings-identify-and-respond-to-concerns
Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018);	https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice
Sexting in schools and colleges: responding to incidents and safeguarding young people (UK Council for Child Internet Safety (UKCCIS), August 2016)	https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people
Children missing education (DfE, August 2024)	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf

Document	Link
Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (DfE, February 2017);	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf
Searching, screening and confiscation: advice for schools July 2022	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1091132/Searching_Screening_and_Confiscation_guidance_July_2022.pdf
Listening to and involving children and young people. (DfE, January 2014)	https://irp-cdn.multiscreensite.com/ca37443c/files/uploaded/Listening%20to%20and%20involving%20children%20and%20young%20people.pdf
Preventing and Tackling Bullying (2017)	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1069688/Preventing_and_tackling_bullying_advice.pdf
Mental Health and Behaviour in Schools_ (2018)	https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2
Safeguarding children (links to government guidance and resources)	https://www.gov.uk/childcare-parenting/safeguarding-and-social-care-for-children
Relationships education, relationships and sex education and health education guidance (DfE, July 2025)	https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education
Concerns around sexual behaviour – Shore – run by the Lucy Faithful Foundation	https://www.lucyfaithfull.org.uk/shore/
Strategy for dealing with safeguarding issues in charities (Charity Commission, December 2017);	https://www.gov.uk/government/publications/strategy-for-dealing-with-safeguarding-issues-in-charities/strategy-for-dealing-with-safeguarding-issues-in-charities
How to report a serious incident in your charity (Charity Commission, June 2019);	https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity
Report serious wrongdoing at a charity as a worker or volunteer (Charity Commission, October 2018);	https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer
NPCC When to call the Police	https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf
Gloucestershire Safeguarding Children’s Partnership – Multi	https://www.gloucestershire.gov.uk/gscp/contact-us/

Document	Link
Agency Safeguarding Hub (MASH);	
Farrer & Co's Child on Child Abuse Toolkit	https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/addressing-child-on-child-abuse.pdf
Sharing nudes and semi-nudes: advice for educational settings December 2020	https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people
Operation Encompass	https://www.operationencompass.org/
Behavioural Guidance in Schools 2024	https://www.gov.uk/government/publications/behaviour-in-schools--2
DfE Filtering and Monitoring Standards for Schools and Colleges	https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges
Cyber Security Standards for Schools and Colleges	https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges
Technology, planning and cyber security	https://www.gov.uk/guidance/plan-technology-for-your-school https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/updates https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education
Online – misinformation, disinformation and conspiracy theories	https://pearsfoundation.org.uk/news/pears-foundation/teachers-to-be-trained-to-help-pupils-tackle-conspiracy-belief-and-online-misinformation/ https://www.educateagainsthate.com/fake-news-misinformation-disinformation/

Annex A – Safeguarding Policy for CLC Services (Commercial and Health and Fitness Centre Activities)

To be used in conjunction with the CLC Safeguarding and Child Protection Policy and Procedures

Key CLC Services contacts

Safeguarding Lead (DSL) Hannah Dwyer, Commercial Manager	Email: dwyerh@cheltladiescollege.org Telephone number: 01242 707003 Mobile number: 07932 066159
Deputy Safeguarding Lead (DSL) Paul Gowan, HFC Manager	Email: gowanp@cheltladiescollege.org Telephone: 01242 261346
Managing Director Nigel Richards	Email: richardsn@cheltladiescollege.org Mobile: 07713 077211
Adult Social Care Helpdesk	01452 426868 Out of hours Emergency Duty Team: 01452 614194 edt@gloucestershire.gov.uk Referral Portal: https://adultsocialcareportal.gloucestershire.gov.uk/web/portal/pages/safeguardingreferral#h1
Gloucestershire Domestic Abuse Support Service	Helpdesk: 01452 726570 Email: support@gdass.org.uk 24-hour National Domestic Violence Helpline: 0808 2000247

Other relevant contacts as per the CLC Safeguarding and Child Protection Policy and Procedures

1. AIMS

- 1.1 This Annex is to be used in conjunction with *CLC Safeguarding and Child Protection Policy and Procedures* in order to encapsulate the safeguarding and child protection policy and procedures of CLC Services, the trading subsidiary of Cheltenham Ladies' College.
- 1.2 The aims of this policy are as follows:
 - 1.2.1 To actively promote the welfare of children, adults at risk, staff, hirers, members of the public and other who come into contact with College and its facilities and to protect them from harm
 - 1.2.2 To have clear procedures in place for dealing with and referring concerns about the welfare of any individual and / or allegations of abuse (including child on child abuse) who may be using CLC facilities and premises outside of College use
 - 1.2.3 To raise awareness about how to report concerns and ensure they are appropriately investigated

- 1.2.4 To ensure staff are competent to carry out their safeguarding responsibilities and feel supported in this role
- 1.2.5 To ensure hirers of CLC facilities are aware of their safeguarding responsibilities and have their own suitable policies and procedures in place
- 1.2.6 To ensure consistent good safeguarding practice throughout CLC Services, and
- 1.2.7 To create a culture of safety, equality and protection

2. SCOPE

- 2.1 This policy applies to all CLC Services activity, including any activities of the Venues and Events Department, residentials and summer schools, and the public membership side of the Health and Fitness Centre

3. REGULATORY FRAMEWORK

- 3.1 Alongside legislation and guidance stated in the CLC Safeguarding Policy, this policy has been prepared to meet CLCS's responsibilities under:

- 3.1.1 KCSIE (updated annually), specifically paragraphs 166, 167 and 381
- 3.1.2 Working Together to Safeguard Children 2023
- 3.1.3 Out-of-School settings: safeguarding guidance for providers
- 3.1.4 Care Act 2014
- 3.1.5 Online Safety Act 2023
- 3.1.6 Care and support statutory guidance 2025
- 3.1.7 Domestic Abuse Act 2021

4. PUBLICATION AND AVAILABILITY

- 4.1 This policy is published on the Venues website and Health and Fitness Centre website.
- 4.2 This policy is available in hard copy at the Health and Fitness Centre, or at main college on request.
- 4.3 A copy of the policy is available for inspection from the Principal's Office during the College day.
- 4.4 This policy can be made available in large print or other accessible format if required.
- 4.5 This policy and all policies referred to in it are also available to staff on the College intranet

5. DEFINITIONS

- 5.1 Where the following words or phrases are used in this policy:
 - 5.1.1 **Safeguarding** is the protection of people from harm.

5.1.2 **Safeguarding and promoting the welfare of children** is defined in WTSC and KCSIE as:

- Protecting children from maltreatment, inside or outside the home, including online
- Providing help and support to meet the needs of children as soon as problems emerge
- Preventing impairment of children's mental or physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- Taking action to enable all children to have the best outcomes

5.1.3 **DSL** means the School's or CLC Service's Designated Safeguarding Lead. References to the DSL include the Deputy DSL (DDSL) where the DSL is unavailable.

5.1.4 Reference to **staff** includes all those who work for or on behalf of College, regardless of their employment status, including contractors, volunteers and members of Council unless otherwise indicated

5.1.5 **HFC** is CLC's Health and Fitness Centre, which serves the PE, Sport and Outdoor Education needs of College students as well as offering public membership

5.1.6 **CLCS** or **CLC Services** is the trading subsidiary of Cheltenham Ladies' College

5.1.7 An **adult at risk** is someone over 18 years old who:

- Has care and support needs stemming from a mental, physical or learning disability, age, illness or other impairment
- Is unable to protect themselves from substantial harm or exploitation, either due to their condition or other circumstances

5.1.8 A **vulnerable adult** can be defined as:

- Someone experiencing mental health problems
- An older person who may be frail or lack financial resources
- An individual with a physical or sensory impairment
- Someone with a learning disability

6. RESPONSIBILITY STATEMENT AND ALLOCATION OF TASK

6.1 The board of CLCS has overall responsibility for all matters which are the subject of this policy.

6.2 To ensure the efficient discharge of its responsibilities under this policy, the board has allocated the following tasks:

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	Commercial Manager	As required, and at least annually
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Commercial Manager	As required, and at least annually
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the GDPR	Commercial Manager	As required, and at least annually
Seeking input from interested groups (such as HFC members, staff, parents) to consider improvements to the processes under the policy	HFC Manager	As required, and at least annually
Formal annual review of CLCS's safeguarding policies and procedures and their implementation.	Board of CLCS	At least annually

6.3 Designated Safeguarding Lead

6.3.1 The Commercial Manager acts as DSL, and the HFC Manager acts as DDSL for CLC Services. Both are Level 3 DSL trained to the same standard as the Designated Safeguarding Lead for College, and will continue to keep their training relevant and up to date. Both have undertaken training specific to the School Enterprise industry, which includes management of risk to adults at risk.

6.3.2 The CLC Services DSL and DDSL will be the main point of contact for any such safeguarding matters raised internally or externally by Hirers or HFC members concerning external users of CLC facilities, including summer schools and HFC members.

6.3.3 The CLC Services DSL and DDSL will liaise with the College DSL should any referral need to be made, and will also seek advice where necessary with relevant agencies.

6.3.4 Either the Services DSL or DDSL will be available at all times throughout the year, both during term time and holiday periods.

7. ADULTS AT RISK AND VULNERABLE ADULTS

7.1 Adults at risk, or vulnerable adults, may be at increased risk of:

- 7.1.1 Physical abuse: Including being hit, restrained, or injured
 - 7.1.2 Sexual abuse: Involving sexual harassment or other forms of sexual assault
 - 7.1.3 Financial abuse: Such as stealing or misusing someone's money
 - 7.1.4 Self-neglect: When someone does not receive adequate food, medication, or help with personal care
 - 7.1.5 Modern slavery: Being forced into servitude or labour
- 7.2 For any hirer working with adults who might be vulnerable or at risk, we expect that The Care Act 2014 and its guidance (June 2023), and the principles of the Mental Capacity Act 2005 are followed.
- 7.3 These include the following principles from the Care Act 2014:
- 7.3.1 Empowerment: People being supported and encouraged to make their own decisions and informed consent
 - 7.3.2 Prevention: It is better to take action before harm occurs
 - 7.3.3 Proportionality: The least intrusive response appropriate to the risk presented
 - 7.3.4 Protection: Support and representation for those in greatest need
 - 7.3.5 Partnership: Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse
 - 7.3.6 Accountability: Accountability and transparency in safeguarding practice.
- 7.4 And the following principles from the Mental Capacity Act 2005:
- 7.4.1 A person must be assumed to have capacity unless it is established that he/she lacks capacity
 - 7.4.2 A person is not to be treated as unable to make a decision unless all practicable steps to help him/her to do so have been taken without success
 - 7.4.3 A person is not to be treated as unable to make a decision merely because he/she makes an unwise decision.
 - 7.4.4 An act done, or decision made, under this Act for or on behalf of a person who lacks capacity must be done, or made, in his/her best interests
 - 7.4.5 Before the act is done, or the decision is made, regard must be had to whether the purpose for which it is needed can be as effectively achieved in a way that is less restrictive of the person's rights and freedom of action
- 7.5 Hirers must also abide by the Safeguarding Agreement which forms part of their contract (see Appendix 1).
8. PROCESS SHOULD ANY MEMBER OF STAFF HAVE A SAFEGUARDING CONCERN
- 8.1 *If there is an immediate risk to the child or adult at risk, call 999.*
 - 8.2 If no immediate risk, contact the CLC Services DSL or DDSL and make a full report of your concern. Even low-level concerns should be reported, do not assume someone else has reported it.
 - 8.3 In exceptional circumstances where the CLCS DSL or DDSL are not available, staff must not delay action, and contact a member of the CLC Safeguarding Team. This information should then be shared with the CLCS DSL or DDSL as soon as practicable.

- 8.4 The DSL and DDSL will review the concern, investigate further and collate evidence where appropriate. They may seek advice from the College DSL and/or Gloucestershire LADO. Should the concern involve children or adults at risk who are the responsibility of a hirer, the DSL or DDSL will speak to the hirer. Should the concern be for a member of the public, the DSL or DDSL will speak to the parent or carer should this not put the individual at risk.
- 8.5 Should the DSL/DDSL feel the concern meets the threshold for referral, or there is a pattern of low-level concerns, an official MARF will be completed.
- 8.6 Any concerns regarding Prevent, radicalisation or Female Genital Mutilation should be reported to the police via 101, asking for the Prevent or FGM lead
- 8.7 If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.
- 8.8 Should the concern be regarding an Adult at Risk, if the adult is deemed to have capacity to understand and make decisions, their consent is required before any referrals or sharing of information with other agencies. Reporting without consent is permissible in the following circumstances:
 - 8.8.1 There is a risk or harm to the wellbeing and safety of the adult or others
 - 8.8.2 Other adults or children could be at risk from the person causing harm
 - 8.8.3 It is necessary to prevent crime or if a crime may have been committed
 - 8.8.4 The person lacks capacity to consent
- 8.9 A review will take place as to whether CLC Services processes can be improved in light of the incident.
- 8.10 Any low-level concerns relating to a member of CLC staff must be reported to the Head of College.

9. CLCS IN-HOUSE LESSONS AND COURSES

- 9.1 Where CLCS runs in-house lessons, courses or summer schools involving children or adults at risk, the following should be in place:
 - 9.1.1 All staff, including fixed term and contractors, should have undergone appropriate Safeguarding training, be aware of the contents of the CLC Safeguarding Policy and CLCS Annex, and know the contact details for the CLCS DSL and DDSL.
 - 9.1.2 All staff, including fixed term and contractors, must have undergone a DBS check and that the check shows no criminal history (blemishes). Where a DBS contains a blemish, a risk assessment should be undertaken in conjunction with HR.
 - 9.1.3 Where freelance staff are working at the HFC (for example in a Personal Trainer capacity) and only subject to a List 99 check, they should not conduct any PT sessions with under 18s or adults at risk
 - 9.1.4 A suitable safeguarding risk assessment should be in place (this may be a section on the main risk assessment for the course or activity)
 - 9.1.5 A suitable fire safety and evacuation plan should be in place and communicated to all staff.
 - 9.1.6 Suitable and sufficient first aid provision should be in place

- 9.1.7 Any third party providers undergo suitable checks, or are under the direct supervision of CLC staff whilst interacting with children or adults at risk
- 9.1.8 Appropriate levels of supervision scheduled for all activities, lessons and overnights.
- 9.1.9 Consideration should be given to the allocation of facilities, for example separate labelled staff and student bathrooms in boarding houses, or changing areas in the HFC.
- 9.1.10 Where the course or lesson involves use of the CLC Wi-Fi, CLCS to provide monitoring and filtering of online activity

10. PROCEDURE FOR COMMERCIAL AND HFC HIRERS

- 10.1 Commercial and HFC Hirers must abide by the Safeguarding Agreement (Appendix 1) which forms part of their contract.
- 10.2 A Safeguarding risk assessment (or safeguarding section included in the main risk assessment) must be produced by both CLCS and the hirer should the activity involve children or adults at risk.
- 10.3 Where multiple events are taking place across the site during peak times (Easter and Summer holidays) a MUSRA (Multiple-Use Safeguarding Risk Assessment) should be completed by the CLCS DSL.

11. PROCEDURE FOR HFC MEMBERS AND PUBLIC USE

- 11.1 Whilst members of the public using CLC facilities are not required to undergo any checks or training, staff are required to be vigilant to any concerns or risks involving young members of the public, adults at risk or interactions between CLC students and public. They are encouraged to report any concern, no matter how minimal.
- 11.2 During term time, CLC students are segregated from the public by using separate areas locked off by fast vein access systems, and separate labelled changing areas.
- 11.3 Both PE and HFC staff are vigilant to any breach of segregation between members and students.
- 11.4 Pool and multi-gym sessions are clearly timetabled to be either exclusively for member or student use.
- 11.5 Only students aged 16 and over are able to use the gym facilities alongside members.

12. REFERRALS AND RECORD KEEPING BY HIRERS

- 12.1 Any hirer working with children or adults at risk has completed and signed a declaration indicating the designated DSL and the organisation's safeguarding protocols.
- 12.2 The hirer's DSL will be expected to liaise without delay with the CLC Services DSL (or deputy) on any safeguarding matters that occur on College site.

- 12.3 The hirer is responsible for managing referrals and/or seeking advice from any relevant agency, unless CLCS deems an intervention is required.
- 12.4 The hirer is responsible for ensuring accurate records are kept and shared accordingly so that the Commercial team have awareness as soon as possible (within 24 hours) of any safeguarding or child protection issues and will retain records within the relevant hirer file.
- 12.5 The Commercial team are here to support and guide where necessary and to notify the College DSL.
- 12.6 The CLC Services DSL and DDSL shall store all confidential documentation regarding safeguarding concerns and referrals on a closed sharepoint with limited access.

13. HOLDING AND SHARING INFORMATION

- 13.1 Any hirer working with young children or adults at risk should ensure they keep adequate records of any concern, allegation or referral.
- 13.2 Using their discretion, they should inform schools, colleges, agencies and practitioners where necessary.
- 13.3 The hirer is responsible for ensuring any transferring of records is carried out safely and securely.
- 13.4 Information from the CLC Services Safeguarding sharepoint may be shared with the College DSL for the purposes of seeking advice.
- 13.5 Abridged and censored information may be shared with the COO and CLC Services board if appropriate

14. STAFF TRAINING

- 14.1 All Commercial and HFC staff undergo the mandatory CLC Safeguarding on induction and annual updates.
- 14.2 In addition customer-facing staff also undergo bespoke Safeguarding training tailored to the industry and potential risks.
- 14.3 All staff should be made aware of the identity of the CLCS DSL and DDSL and the process of reporting a safeguarding concern.
- 14.4 All staff should be made aware that anyone can make a referral, not just the DSL or DDSL
- 14.5 All staff should be made aware of the contents of the CLC Safeguarding Policy and CLCS Annex

15. VERSION CONTROL

Date of adoption of this policy	TBC
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Date for next review of this policy	October 2026
Policy owner	Hannah Dwyer, Commercial Manager, CLCS

SEA Safeguarding Agreement for Hirers

Safeguarding of adults and children is integral to the hiring of our venue. This document outlines what assertions and documents relating to safeguarding are required from you prior to the hire commencing, and what is expected of you and your staff as a hirer.

Where you are working with children, we expect that the statutory guidance Working Together to Safeguard Children 2023 and Keeping Children Safe in Education (KCSIE) 2025, or as updated, are followed.

Where you are working with adults who might be vulnerable or at risk, we expect that The Care Act 2014 and its guidance (22nd July 2025), and the principles of the Mental Capacity Act 2005 are followed.

Safeguarding Policy and Procedures

It is a condition of this agreement that:

1. Prior to the start of the agreement, you provide us with written confirmation and a copy of your own safeguarding policy that is suitable for the activity you will carry out on the school premises during the period of this hire. The policy should include:
 - Identification and contact details of a Designated Safeguarding Lead (DSL)
 - Contact details for the Local Authority Designated Officer (LADO) and the local referral route into children's social care
 - Expected recognition of safeguarding for children/adults as required
 - Reporting arrangements for safeguarding concerns within your organisation
 - Reporting any allegations or concerns of abuse made against members of your staff or volunteers
 - Arrangements for the care of children or adults about whom there are already safeguarding concerns.
2. The policy should be disseminated to, and well known by your own staff and available to those undertaking the activity (or their parents/carers) if required.
3. That prior to the start of the agreement, you will have conducted a risk assessment based on the hire activities and first aid supplies that relate to the risk assessment must be provided by you. Risk assessments should be reviewed and updated annually, or earlier if the circumstances in the school change or public health advice changes. Active arrangements should be in place to monitor whether your controls for managing risks are effective and working as planned.
4. That you have paediatric first aid training where children aged 5 and under are attending the provision (unless you are exempt from registration with Ofsted).
5. That you have a fire safety and evacuation plan in place.

Training:

6. That all staff who will be present or have a position of responsibility at the activity have completed appropriate safeguarding and health and safety training relevant to children, adults (or both) depending on the activity, and that this training is regularly updated. All staff should receive regular safeguarding and child protection updates as required and at least annually.

All staff should ensure that they understand and will comply with the requirements set out in the most current version of KCSiE.

Staff Names:

7. That you provide us with the names of all staff who will be on site before they attend. Please ensure that this includes first and last names and titles and that lanyards are provided for the staff who will be onsite as part of your activity, either by your organisation or by the school after consultation.
8. That you verify the identity of your staff with an official document. Preferably this should be photographic such as a driving licence or passport. School will request verification of identity when your staff arrive on school site.

Safer Recruitment and Checks:

9. You provide us with written confirmation that the following checks have been completed on each of member of staff associated with your activity and who will be on site, prior to the start of the hiring agreement:
 - An enhanced disclosure from the Disclosure and Barring Service (DBS) for working with children/adults (or both, depending on the activity) and that the check shows no criminal history (blemishes). Where you are an organisation from overseas, please provide us with the equivalent checks.
 - A check of the Children's and or Adults' Barred List and that the individual is not barred from working with Children/Adults (activity dependent).
 - The individual's right to work in the UK.
10. Where a DBS contains an entry of any kind (a blemish), you provide us with a copy of the DBS certificate so that we may assess blemishes and determine whether staff are suitable to attend the school premises. Where you are an organisation from overseas, please provide us with the equivalent checks.
11. You undertake to regularly monitor and performance review staff and volunteers to ensure their suitability and training requirements after their appointment, and agree to immediately notify us if:
 - any member of staff relating to this hirer agreement are or become barred from working with children or adults;
 - any member of staff relating to this hirer agreement are the subject of a referral to the DBS or any regulatory body;
 - any member of staff relating to this hirer agreement are released under investigation, arrested, charged, cautioned or convicted of any criminal offence;
 - any member of staff relating to this hirer agreement, or any member of their household becomes the subject of a formal child protection investigation;
 - you become aware of any circumstances relating to any member of staff relating to this hirer agreement that may reasonably be considered to pose a safeguarding risk to children or adults; or
 - there is any change in the circumstances of any member of staff relating to this hirer agreement that affects their right to work in the UK.

Conduct:

12. You undertake and agree to ensure that each member of staff relating to this Hirer Agreement will conduct themselves in a professional way while on school site and will comply with any reasonable code of conduct or instruction in relation to safeguarding issued from time to time by us in relation to the hiring of the facilities.
13. The hirer will liaise with the school's DSL in relation to safeguarding throughout the period of hire.
14. Any concerns about the conduct or behaviour of staff under this Hirer Agreement which relate to an allegation of abuse or neglect of children or adults at risk must be notified to the school's DSL within 24 hours and will be referred to the Local Authority Designated Officer (LADO) for children or to the police or other applicable body. The hirer agrees to comply with any subsequent instruction in relation to safeguarding received from the school.
15. If we determine that any member of staff related to this Hirer Agreement is unsuitable to attend the school premises for any reason, we may exclude that person from the school premises and prevent their future attendance.
16. Any members of your activity who are not staff must not have unsupervised access to children or adults who may be deemed vulnerable unless they are a parent or relative.
17. The hirer will have in place a complaints procedure that includes provision for children, young people, and families to raise a safeguarding concern; together with a whistleblowing policy so that staff can raise concerns about the maltreatment of any children; and a staff behaviour policy.

Online Safeguarding

18. All adults on school site must conduct themselves online in a professional manner. This includes:
 - Not engaging with children on social media.
 - Not inviting pupils from the school or children from other groups onto adults' own personal social media or requesting or offering personal contact details.
 - Not taking photographs of children unless this forms part of a group within your activity who have provided parental consent.
 - Not live-streaming activities without consent.
 - Not engaging in any online activity which could be viewed as grooming or sexually explicit with children or adults who might be vulnerable or at risk.
 - Not engaging in any online activity which could be viewed as bullying, or allowing online child on child abuse to go unreported.

Duties under Prevent:

19. It is a condition of this Hirer Agreement that you and those attending as part of your activity:

- do not organise or take part in any activities or presentations that incite hatred, violence, or call for the breaking of the law take place on the school premises;
- do nothing to encourage, glorify or promote any acts of terrorism, including individuals, groups or organisations that support such acts;
- do nothing to spread hatred and intolerance of any minority group(s) in the community;
- avoid insulting other faiths or groups, within a framework of positive debate and challenge; and
- do not raise or gather funds for any external organisation or cause which supports, encourages or promotes hatred or intolerance of any minority group.

Supervision and Staff use of Facilities

20. Required staffing levels for each activity will be agreed as part of the requirements for your activity. This may include:

- Sufficient staff numbers for supervision of children staying overnight
- Sufficient staff who are first aid qualified
- How staff use the facilities required for their activities for example the use of separate bathrooms and sleeping arrangements.

Compliance

21. **The hirer shall comply with all instructions received from the school in respect of safeguarding requirements.**

Breach

22. **Any breach of safeguarding matters highlighted in this document will be considered to be a material breach of the agreement and result in immediate termination.**

Hiring Organisation name and address	Lead Hirer’s Name	Lead Hirer’s Signature	Date