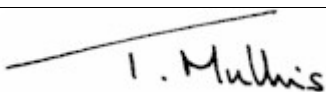




SAFEGUARDING AND CHILD PROTECTION POLICY

BEDSTONE COLLEGE

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Safeguarding Policy

This policy applies to all members of our college community, including boarders and those in our EYFS. Bedstone College is fully committed to ensuring that the application of this policy is non-discriminatory in line with the [UK Equality Act \(2010\)](#). Further details are available in the college's Equality and Diversity Policy document.

Policy Statement and Aims

Bedstone College is committed to SAFEGUARDING and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

This policy has been authorised by the Directors. Child protection is the responsibility of all members of the college. All staff members are expected to be familiar with the policy, its contents and procedures. A copy of the policy is available to staff as a hard copy in the policy folder in the staff room and is also available on the staff area on the College network. There is a requirement that all staff members (new and existing) and volunteers will be trained in safeguarding issues and procedures at regular intervals, in accordance with Local safeguarding children partnership (LSCP) (Shropshire Safeguarding Partnership SSP (<http://www.safeguardingshropshireschildren.org.uk/about-us/>) recommendations. Informal updates will be given by the DSL throughout the year, either in person or via electronic means. The policy is published on the College website (www.bedstone.org). A hard copy is available for inspection by parents at the office. The policy applies wherever staff or volunteers are working with students whether on site at College or away from the College on College business, for example at an activity centre or on an educational visit.

The Policy of the College is to work in partnership with parents in order to promote the welfare of children. The College also aims to build up relationships of trust with children. Children and parents should feel able to raise with the College concerns about safety and welfare in the knowledge that these will be dealt with sensitively.

Every student should feel safe and protected.

Any member of the college community is entitled to raise issues concerning child protection with the designated persons with responsibility or directly with the Local Authority Designated Officer (LADO), Tel. 0345 678 9021.

This policy is part of the more general policy on welfare, health and safety of students. It is linked to the policies on "Supervision of ancillary, contract and 'unchecked' staff", "Anti-Bullying", "Safer Recruitment and DBS Disclosure Policy", "Missing Student", "Sexting", "e-safety", "Access to school premises by people outside the school", "Whistleblowing" and "Staff code of conduct".

Statutory Guidance

This Policy addresses the following relevant guidance:

- The Bedstone College Boarding Handbook
- [Keeping Children Safe in Education \(September 2023\) \(KCSIE\)](#)
(KCSIE incorporates the additional statutory guidance, [Disqualification under the Childcare Act 2006 \(August 2018\)](#))
(KCSIE also refers to the non-statutory advice for practitioners: [What to do if you're worried a child is being abused \(March 2015\)](#))
- [Working together to Safeguard Children \(WTTTSC\) \(2018\) \(updated Feb 2019\)](#)
(WT refers to the non-statutory advice: [Information sharing \(March 2015\)](#) (updated July 2018))
- [Prevent Duty Guidance: for England and Wales \(March 2015\) \(updated 2021\)](#)
Prevent is supplemented by non-statutory advice and a briefing note:
[The Prevent duty: Departmental advice for schools and childminders \(June 2015\)](#) (updated August 2015)
[The use of social media for on-line radicalisation \(July 2015\)](#)
- NMS: Standard 8
- ISI Regulatory Requirements: Part 3, Para 7 (a and b)
- ISI Regulatory Requirements: Part 3, Para 8 (a and b)
- ISI Regulatory Requirements: The Early Years Foundation Stage, Section 3, para 3.4 – 3.8

The College's Commitment To Child Protection

The College will take all reasonable measures to:

- ensure that we practise safe recruitment in checking the suitability of staff and volunteers (including staff employed by another organisation) to work with children and young people in accordance with regulations and guidance given *in KCSIE (2023)*, the Education (Independent School Standards) (England) Regulation 2019, (as amended where appropriate), and the National Minimum Standards for Boarding Schools.
- ensure that we carry out all necessary checks on the suitability of people who serve on the College's governing body in accordance with regulations and guidance given *in KCSIE (2023)*;
- ensure that where the College ceases to use the services of any person (whether employed, contracted, a volunteer or student) because they think that the person has engaged in conduct that harmed, (or is likely to harm), a child; or if that person otherwise poses a risk of harm to a child, a prompt, (as soon as possible and certainly within two weeks), and detailed report is made to the (DBS) and the Teaching Regulation Agency (TRA) using the appropriate referral form. Contact details for both on p23.

- protect each student from any form of abuse, whether from an adult or another student;
- be alert to signs of abuse both in the College and from outside;
- deal appropriately with every suspicion or complaint of abuse;
- design and operate procedures which promote this policy;
- design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;
- support children who have been abused in accordance with his/her agreed child protection plan;
- be alert to the medical needs of children with medical conditions;
- consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in our College or in our local area;
- have regard to guidance issued by the Secretary of State for Children, Schools and Families in accordance with section 157 of the Education Act 2002 and associated regulations.

Every complaint or suspicion of abuse from within or outside the College will be investigated. In all circumstances, the College will first take advice from the LADO/team of designated officers and/or the Police. No investigation will take place without the proper authority to do so from the appropriate external agency. In all proper circumstances a referral will be made to an external agency such as the Children's Services Department of the local authority (**CSD**), or the Child Protection Unit of the police (**CPU**). In each case, the matter will be referred to the Local Authority Initial Contact Team on 0345 678 9021.

The College will ensure the child's wishes or feelings are taken into account when determining what action to take and what services to provide to protect individual children through ensuring there are systems in place for children to express their views and give feedback. However, the child's wishes cannot override the duties placed on the college to refer suspected abuse to the LADO/team of designated officers or the Police.

This policy differentiates between children who have suffered or are at risk of suffering serious harm, (being in immediate danger), and those who are in need of additional support from one or more agencies (concern), (including the pastoral structure within the College). The former should be reported to CSD immediately, the latter should lead to inter-agency assessment using local processes, (which could be within the College context only), to offer additional support to ensure that problems do not escalate. These processes might include Early Help, The SSP Threshold document and/or Team Around a Child (TAC), procedures. <https://www.shropshire.gov.uk/early-help/practitioners/early-help-forms/>

Boarders' Safeguarding

This policy applies to both day and boarding pupils. Boarding pupils are at risk both during the day and in the evenings during boarding time. Staff will be alert to all safeguarding issues, particularly child on child abuse and risks.

The Head and Deputy Head (both level 3 safeguarding trained) live on site, or nearby, and are available 24 hours a day during term time.

Where a member of boarding staff is suspended pending an investigation of a child protection nature alternative accommodation will be provided away from children.

The School's RHSE Plan & Policy

Bedstone College has a policy for teaching students about relationships and Sex Education (RSE). The schools policy and scheme of work can both be found on the school's website updated for 2022.

The Designated Safeguarding Leads (DSLs) (Role and responsibilities)

The Deputy Head (Mr Chris Braden) and the Head of Student Welfare (Mr Alex Whitlam) are both level 3 qualified Safeguarding leads and are appointed the DSLs to be responsible for matters relating to child protection and welfare. They are members of the College's leadership team. They can be contacted via the college by telephone at 01547-530303, or by e-mail. Posters around the College provide photographs to identify them and contact details (Appendix B).

The main responsibilities of the DSLs are:

- to be the first point of contact for parents, students, teaching and non-teaching staff and external agencies in all matters of child protection;
- to co-ordinate the child protection procedures in the College; ensuring each member of staff has access to and understands the College's Safeguarding (child protection) policy and procedures, especially new and part time staff;
- be alert to the specific needs of children in need, those with special educational needs and young carers;
- to maintain an ongoing regular training programme for all College employees (in line with recommendations from the Safeguarding partners);
- to ensure all staff read KCSIE part 1 and annex A (as appropriate) annually;
- to ensure that additional updates are carried out regularly, usually via staff meetings or e-mail;
- to ensure all staff are trained to manage a report (disclosure), particularly with regard to child-on-child sexual violence and sexual harassment;
- to ensure that job descriptions are updated where appropriate;
- to undergo training (updated at least every two years) in child protection and inter-agency working for designated leads every two years;

- to monitor the keeping, confidentiality and storage of records in relation to child protection;
- to ensure that safeguarding information is passed on to new schools when a student leaves;
- to remedy any deficiencies or weaknesses in child protection arrangements without delay;
- keep detailed, accurate, secure written records of concerns and referrals;
- to review annually the Safeguarding Policy and other relevant policies and procedures with an appointed Governor and to ensure that the Governing Body review the policy and procedures, and the efficiency with which the related duties have been discharged, on an annual basis;
- to liaise with the LADO/Team of designated officers/Police as required;
- to ensure that individuals are referred to the Disclosure and Barring Service where the person poses a risk of harm to children. It is an offence to fail to make a referral;
- to consider a referral to the Teacher Regulation Agency, (TRA), if the threshold for a referral to the DBS has not been met;
- to act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies;
- to oversee the online safety programme for students;
- to encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them;
- To ensure that all staff, including temporary staff and volunteers receive induction training that includes:
 - (a) safeguarding and the College's Safeguarding (child protection) policy
 - (b) the staff code of conduct
 - (c) the whistleblowing policy
 - (d) the safe practice with technologies policy (on-line safety)
 - (e) on-line safety (e-safety code of conduct & staff agreement)
 - (f) the identity of the Designated Safeguarding Leads (see appendix B)
 - (g) the radicalisation and extremism policy (PREVENT)
 - (h) the discipline, rewards and sanctions policy
 - (i) the anti-bullying policy
 - (j) the equality and diversity policy and accessibility plan
 - (k) the fire evacuation procedures
 - (l) Reading and understanding part 1 of KCSIE (including Annex A)*

- (m) Children Missing from Education Policy
- (n) Managing a report of Child-on-Child sexual violence/harassment

* All members of staff are encouraged to speak with the DSL if they do not understand any aspect of KCSIE.

The Role of Directors, Governors and Proprietors

The Directors, the Governing body and proprietors are accountable for ensuring that the College complies with its legal duties under relevant legislation. The proprietors have delegated responsibility for ensuring that the policies are fully implemented in practice and are reviewed for their effectiveness at least annually and that any deficiencies or weaknesses in child protection arrangements are remedied without delay to the local governing body (LGB). The nominated member of the Board of Directors who is responsible for the oversight of child protection is Robert Tasker (he can be contacted by e-mail at rstasker@ipswichedu.com or on 07863543983). Both the governing body and the Safeguarding Director are suitably trained in safeguarding and promotion of welfare. The Head liaises regularly with the Chair of the Board (usually weekly) and anonymised safeguarding updates are reported to the Board at termly meetings. The Safeguarding policy is reviewed annually by the Board of Governors who receive annual updates of safeguarding training.

Types and Signs of Abuse

Through their day to day contact with pupils, College staff are well placed to observe any signs that a child may be suffering or is likely to suffer significant harm or is in need of additional support to promote their welfare. The College will therefore:

- Establish and maintain an environment where pupils feel secure, are encouraged to talk, and are listened to.
- Ensure pupils know that there are adults in the College whom they can approach if they are worried through the system of form tutors, pastoral team, College nurse and independent listener.
- Include opportunities in the PSHE curriculum for pupils to develop the skills they need to keep themselves safe from harm.

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

Safeguarding and promoting the welfare of children, (any person under the age of 18 years old), is defined for the purposes of this guidance as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up

in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Abuse is 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 an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

Forms of Abuse

Physical Abuse

Bumps and bruises don't necessarily mean a child is being physically abused – all children have accidents, trips and falls. Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

There isn't one sign or symptom to look out for that will say a child is definitely being physically abused. But if a child often has injuries, there seems to be a pattern, or the explanation doesn't match the injury then this should be investigated.

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

Emotional Abuse

There often aren't any obvious physical symptoms of emotional abuse or neglect but you may spot signs in a child's actions or emotions. Changes in emotions are a normal part of growing up, so it can be really difficult to tell if a child is being emotionally abused.

Babies and pre-school children who are being emotionally abused or neglected may:

- be overly-affectionate towards strangers or people they haven't known for very long
- lack confidence or become wary or anxious
- not appear to have a close relationship with their parent, e.g. when being taken to or collected from nursery etc.
- be aggressive or nasty towards other children and animals.

Older children may:

- use language, act in a way or know about things that you wouldn't expect them to [know 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.

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development is emotional abuse. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how

they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual Abuse

This involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see section in this policy on Child-on-Child abuse).

Children who are sexually abused may:

Stay away from certain people

- they might avoid being alone with people, such as family members or friends
- they could seem frightened of a person or reluctant to socialise with them.

Show sexual behaviour that's inappropriate for their age

- a child might become sexually active at a young age
- they might be promiscuous
- using sexual language or know information that [you wouldn't expect them to](#).

Have physical symptoms

- anal or vaginal soreness
- an unusual discharge
- sexually transmitted infection (STI)
- pregnancy.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of

inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Neglect can have serious and long-lasting effects. It can be anything from leaving a child home alone to the very worst cases where a child dies from malnutrition or being denied the care they need.

In some cases it can cause permanent disabilities. Neglect can be really difficult to identify, making it hard for professionals to take early action to protect a child.

Having one of the signs or symptoms below doesn't necessarily mean that a child is being neglected. But if you notice multiple, or persistent, signs then it could indicate there's a serious problem.

Children who are neglected may have:

- Poor appearance and hygiene
- Health and development problems
- Housing and family issues

Child on Child Abuse

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). And that it can happen both inside and outside of school or 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.

All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child on child abuse they should speak to their designated safeguarding lead (or deputy).

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

Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- 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);
- 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);

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- 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;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- 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).

For more information on Child on child Abuse and the schools response to it, please see Bedstone College's ***Child-on-Child Abuse Policy 2022***. A copy of the policy is available to staff as a hard copy in the policy folder in the staff room and is also available on the staff area on the College network.

Particular Vulnerabilities of those with SEN/D

Disabled children are at significantly greater risk of all types of abuse than nondisabled children.

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Research indicates that disabled children at greatest risk of abuse are children with behaviour/conduct disorders. Other high-risk groups include children with learning difficulties/disabilities, children with speech and language difficulties, children with health-related conditions and deaf children. In addition, research generally suggests that disabled boys are at greater risk of abuse than disabled girls when compared to non-disabled children.

Online Abuse and Bullying

Many of the signs that a child is being abused are the same no matter how the abuse happens.

A child may be experiencing abuse online if they:

- spend lots, much more or much less time online, texting, gaming or using social media
- are withdrawn, upset or outraged after using the internet or texting
- are secretive about who they're talking to and what they're doing online or on their mobile phone
- have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

On-line abuse can also be a means to facilitate off-line abuse.

Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

For more information on Online Abuse / Social Media, and the schools response to it, please see Bedstone College's **Child-on-Child Abuse Policy 2022**. A copy of the policy is available to staff as a hard copy in the policy folder in the staff room and is also available on the staff area on the College network.

Mental Health

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. Education 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.

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.

Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

Abuse intended to radicalise students

The school will, in response to section 26 of the Counter-Terrorism and Security Act 2015, have due regard to the need to prevent students and staff from being drawn into terrorism. This is known, in brief, as the Prevent Duty.

The school takes the following actions;

- staff in regular contact with students are required to do the Chanel online training course;

- there will also be assemblies, tutor meetings and RSE lessons on the topic.
- At the beginning of every term the DSL, DDSL, Director responsible for safeguarding and senior managers, in partnership with LADO, assess the influences and risks to which students may be exposed within the school, the locality, the social media, the internet and their homes.
- The results of the risk assessment will be recorded by the DSL. If any risks or influences are discovered the above team formulate strategies to eliminate them and inform all staff of such strategies and dangers immediately.
- Staff in regular contact with students receive training in how to identify signs of radicalism in students through observing changes in behaviour etc. Staff are advised on actions to take should they identify such (reporting to DSL immediately)
- The DSL and senior managers ensure the school SMSC policy and programme incorporates specific sections that assist the students to understand the dangers of extremist arguments.
- The DSL and senior managers ensure the school IT and 'e' safety policies have safety procedures in place to block any possible route for students to be targeted online or through the internet where they may be susceptible to terrorist or extremist material.
- The Head ensures parents are continually warned of the dangers of their children being targeted through the internet on home computers. If the DSL suspects a pupil is being radicalised they may discuss the matter with parents. If the DSL considers the child to be at risk of significant harm they may contact the LADO immediately without informing the parents, and then act accordingly.

Female Genital Mutilation, (FGM)

A girl or woman who's had FGM may:

- have difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- have unusual behaviour after an absence from school or college
- be particularly reluctant to undergo normal medical examinations
- ask for help, but may not be explicit about the problem due to embarrassment or fear.

It is now statutory duty upon teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

It will be rare for teachers to see visual evidence, and they should NOT be examining students. Unless a teacher has good reason not to, they should still consider and discuss any such case with the College's DSL and involve children's social care as appropriate.

Children Missing from Education (CME)

If any pupil goes missing or is believed to have 'run away', the protocol in the School's Missing Pupil Policy should be followed.

Self-Harm

Whilst self-harm is not classed as child abuse it can be a sign that a child is being abused. If it comes to the attention of member of staff that a child is self-harming they should alert the DSL for child protection.

Actions by the DSL might include:

- Contacting parents
- Contacting Child Adolescent Mental Health Service (CAMHS)
- Contacting Social Care if the child meets the referral criteria

County Lines

County lines is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or "deal lines". It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as 'cuckooing'.

County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and VCS (voluntary and community sector) organisations. County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

How does County Lines affect children?

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

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

Signs of Involvement in County Lines

A young person's involvement in county lines activity often leaves signs. A young person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs.

Any sudden changes in a young person's lifestyle should be discussed with them. Some indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:

- Persistently going missing from school or home and / or being found out-of- area;
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. 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.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as 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.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. 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.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There is an age appropriate guide to support children 12-17 year olds. The guides explain each step of the process and support and special measures that are available.

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

So-called 'honour-based' violence

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the 33 community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

Actions If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy).

Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

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. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

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

What is Sexual violence and sexual harassment?

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 ie Rape or attempted rape; Sexual Assault:

Consent is about having the freedom and capacity to choose. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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

- sexual comments,
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone,
- online sexual harassment.
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

For more information on sexual violence and harassment between children, and the schools response to it, please see Bedstone College’s **Child-on-Child Abuse Policy 2022**. A copy of the policy is available to staff as a hard copy in the policy folder in the staff room and is also available on the staff area on the College network.

This list of possible types of abuse is by no means exhaustive.

Annex A of KCSIE (Sept 2023) contains important additional information about specific forms of abuse and safeguarding issues.

More information can be found in the KCSIE (Sept 2023) document.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1181955/Keeping_children_safe_in_education_2023.pdf

Children and the court system

Children missing from education

Children with family members in prison

Child sexual exploitation

Child criminal exploitation: county lines

Domestic abuse

Homelessness

So-called ‘honour-based’ violence (including Female Genital Mutilation and Forced Marriage)

Preventing radicalisation

Child on child abuse

Sexual violence and sexual harassment between children in schools and colleges

What is Sexual violence and sexual harassment?

Upskirting

The response to a report of sexual violence or sexual harassment

Additional advice and support

Procedures for Dealing with Concerns about a Child

If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. They should speak to the designated safeguarding lead (or deputy) if appropriate. It may also be necessary to refer to children's social care and if appropriate the police. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

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

All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.}

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing. The written record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the DSL).

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

Where there is a safeguarding concern, the College will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The College manages this by ensuring all pupils have a 'go to person' of their own choice as the need arises. The College operates its processes with the best interests of the pupil at their heart.

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the College and can occur between children outside College. All staff, but especially the DSL and any deputies, should consider the context in which safeguarding incidents and behaviour occur and how they can be associated with factors outside the College. The College will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The College will share as much information with the CSD (or CPU) as

possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

Early Help

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

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health and care plan)
- Has a Mental Health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Is a privately fostered child.
- Has a family member in prison, or is affected by parental offending
- Is at risk or 'honour based' abuse such as Female Genital Mutilation or Forced Marriage
- Is persistently absent from education, including persistent absences for part of the school day.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with one of the DSLs. The DSL will consider the appropriate action to take in accordance with the local SSCB referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

What staff should do if they have concerns about a child

If staff (including governors, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the DSL to agree a course of action although staff can make a direct referral to children's social care. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has

been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

What staff should do if a child is in danger or at risk of harm

If staff (including governors, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the Police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. The College's Safeguarding Children Board is Shropshire Safeguarding Children's Partnership.

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

Staff should follow the College's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999. Advice and support can also be sought from children's social care.

What staff should do if they discover an act of Female Genital Mutilation ('FGM')

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with one of the DSLs and involve children's social care as appropriate.

What staff should do if they have concerns that children are at risk from or involved with serious violent crime

All staff should be aware of indicators which may signal that children are at risk from or are involved with serious violent crime. These may include increased absence from College, 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, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with one of the DSLs to agree a course of action, although staff can make a direct referral to children's social care.

What staff should do if a child goes missing from education

Children who go missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect. The College's procedures for unauthorised absence and for dealing with children who go missing from education are managed in accordance with the College's Missing Child Policy and Procedures to be used for searching for, and if necessary, reporting, any pupil missing from education.

The College holds more than one emergency contact number for each pupil (where possible 3 numbers are kept) to provide the College with additional options to make contact with a responsible adult particularly when a child missing from education is also identified as a welfare and/or safeguarding concern.

Bedstone College will inform the LA in which the student lives, (If they are resident in the UK), if they are going to be deleted from the admission register where they:

- have been taken out of College by their parents and are being educated outside the College system e.g. home education;
- have ceased to attend College and no longer live within reasonable distance of the College at which they are registered;
- have been certified by the College medical officer as unlikely to be in a fit state of health to attend College before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the College after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the College at the end of that period; or,
- have been permanently excluded.

Arrangements for dealing with Child-on-Child Allegations

Child-on-Child abuse is abuse by one or more pupils against another pupil. It can manifest itself in many ways and can include bullying (including cyber bullying), physical abuse, initiation/hazing violence and rituals, upskirting, sexting, sexual assault, gender-based issues and harmful sexual behaviours including sexual violence and sexual harassment. Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours be dismissed as the same or "just having a laugh" or "boys being boys". The College recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

The College recognises that children with special educational needs and disabilities can be more prone to Child-on-Child group isolation than other children and will consider extra pastoral support for those children.

The College recognises that children can be particularly vulnerable in residential settings and are alert to the potential for Child-on-Child abuse. As this is a Boarding School staff need to be aware that children can be particularly vulnerable and should be alert to pupil relationships and the potential for peer abuse.

The College takes steps to minimise the risk of Child-on-Child abuse through supervision, education in the form of PSHE and assemblies.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the College's Anti-Bullying and Behaviour policies.

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

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the Police. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered.

Youth produced sexual imagery (YPSI – formally known as sexting) describes the use of technology to generate images or videos made by children under the age of 18 of other children; images that are of a sexual nature and are indecent. The content can vary, from text messages to images of partial nudity to sexual images or video. These images are then shared between young people and/or adults and with people they may not even know. Young people are not always aware that their actions are illegal and the increasing use of smart phones has made the practice much more common place.

Behaviours linked to consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

The College's approach to YPSI is:

College staff: Confiscate the device and immediately set it to either flight mode, or switch it off. Immediately report the incident and hand the device to the DSL. Make a record of the incident in accordance with record keeping procedures.

DSL: Records all incidents, including both the actions taken as well as those not taken with justifications in line with the advice contained in:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf.

In the event of disclosures about pupil-on-pupil abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with

this policy will be followed. Victims and perpetrators will be offered support by the College – this could be from a number of different people such as the College nurse, the College counsellor, the Deputy Head (Pastoral), Houseparent or tutor and in accordance with the wishes and best interest of the children involved. Support from external agencies will be sought, as appropriate.

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

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

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing College premises and College transport.

Post Incident Support:

Bedstone College is aware of the possible need for counselling, by specialist practitioners, for students who have suffered abuse and others closely involved, including the member of staff to whom the disclosure was made, and appropriate support would be provided.

What staff should do if they have concerns about another staff member

If staff have concerns about another staff member, then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including volunteers) and refer the matter directly to the LADO.

What staff should do if they have concerns about safeguarding practices in the College

The College aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the College's safeguarding systems, these should be raised in accordance with the College's whistleblowing procedures. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the College or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found at the end of this policy.

Arrangements for dealing with Allegations of Abuse against Teachers and Other Staff (including the Head, Governors or Volunteers).

The College's procedures for managing allegations against staff who are currently working in the College follow Department for Education statutory guidance and Shropshire's safeguarding children's partnership arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a pupil
- Possibly committed a criminal offence against or related to a pupil or
- Behaved towards a pupil in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police.

If an allegation is made against anyone working with children in the College, the College should not undertake their own investigation of allegations without prior consultation with the LADO or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the College may discuss informally with the LADO on a no-names basis.

All allegations should be investigated as a priority to avoid any delay.

All allegations which appear to meet the above reporting criteria are to be reported straight away to the Head (or in her absence to one of the DSLs). If an allegation is reported to the DSL, the DSL will keep the Head informed. Where the Head OR DSL is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors.

Where the Head or DSL is the subject of the allegation or concern, the Head OR DSL must not be informed of the allegation prior to contact with the Chair of Governors and LADO. However, staff may consider discussing any concerns with the DSL and make any referral via them. The Head, DSL, Chair of Governors (as appropriate) become the "case manager".

The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO

should be informed within one working day of all allegations that come to the College's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.

The case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course of action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the designated officer and KCSIE when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the College and shall provide them with their contact details.

Where a member of boarding staff is suspended pending an investigation, the case manager will consider whether arrangements for alternative accommodation away from children should be made.

The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.

The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service (DBS), Teaching Regulation Agency (TRA) or DfE should be made where an allegation is substantiated and the person is dismissed or the College ceases to use their services, or the person resigns or otherwise ceases to provide their services. The College has a legal obligation to report promptly to the DBS any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the College must consider making a referral to the TRA and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the College's safeguarding procedures or practices to help prevent similar events in the future. The College will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with KCSIE and a copy will only be provided to the individual concerned. Colleges have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse (IICSA)). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the College will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

Staff Code of Conduct Policy

The College's Staff Code of Conduct Policy can be found on the school R drive. The aim of the Staff Code of conduct Policy is to provide clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

Low-level Concerns Policy

Allegations that do not meet the 'harms test' should be addressed separately. This policy is a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school. Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in this Policy and the Staff Behaviour and Code of Conduct are lived, monitored, and reinforced. This should be read in conjunction with the current statutory guidance – KCSIE 2023.

Who does the policy apply to?

The policy applies to all staff and other individuals who work or volunteer at FSM.

Definition of a low-level concern

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

- is inconsistent with the school's Staff Behaviour and Code of Conduct, and

- does not meet the allegations threshold (harms test) or is otherwise not considered serious enough to make a referral to the LADO.

Examples of behaviour that could require reporting of a low-level concern 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;
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harms test threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately.

Ensuring they are dealt with effectively should also protect those working in or on behalf of the Schools from potential false allegations or misunderstandings.

Reporting low-level concerns

Where a low-level concern has been identified, this will be reported as soon as possible to the Head. However, it is never too late to share a low-level concern if this has not already happened. Where the Head is not available, the information will be reported to the designated safeguarding lead (or deputy), i.e. the most senior member of SLT acting in this role.

Where the low-level concern has been reported to the DSL, they will inform the Interim Head of the details as soon as possible. Low-level concerns about the Designated Safeguarding Lead will be reported to the Head and those about the Interim Headmaster will be reported to the Director responsible for Safeguarding.

Where the low-level concern relates to an agency worker, supply staff or contractor, the Head will notify the employer so any potential patterns of inappropriate behavior can be identified.

Recording concerns

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward. Where concerns are reported verbally to the Head a record of the conversation will be made by the Head which will be signed, timed, and dated.

Responding to low-level concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Head will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or police (HR advice from the Operations Director may also need to be taken)³¹
- When a low-level concern is raised by a third party, the Head should collect as much evidence as possible with the person who raised the concern, to the individual involved and any witnesses.

Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses. The information reported and gathered will then be reviewed to determine whether the behaviour:

- is consistent with the school's Staff Behaviour and Code of Conduct: no further action will be required
- constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The staff member, volunteer or contractor should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. via the Disciplinary Procedures.
- is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and HR advice taken from the Operations Director.

Allegations procedure within the Child Protection Policy and Disciplinary Policy/Procedure will be followed:

- when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and HR advice taken from the Operations Director. In this case, the school's Child Protection Policy and Disciplinary Policy/Procedure will be followed

When considered with any other low-level concerns that have previously be made, records will be made of:

- all internal conversations including any relevant witnesses
- all external conversations, e.g. with the LADO
- the decision and the rationale for it
- any action taken.

Can the reporting person remain anonymous?

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required. **See Whistleblowing Policy**

Should staff report concerns about themselves (ie self-report)?

It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Staff Behaviour and Code of Conduct. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

Where behaviour is consistent with the Staff Behaviour and Code of Conduct, Feedback will be given to both parties to explain why the behaviour was consistent with the Staff Behaviour and Code of Conduct.

Should the low-level concerns file be reviewed?

The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained. Where a pattern of behaviour is identified the School will decide on the following course of action:

- Internal disciplinary procedures if the harms test threshold is not met.
- Referral to the LADO if the harms test threshold is met.

The School will consider any wider cultural issues that enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimize the risk of reoccurrence.

The rationale for all decisions and actions taken will be recorded.

References

Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the harms test threshold for referral to the LADO and found to be substantiated.

What is the role of the Directors?

The Head will regularly inform the Directors about the implementation of the low level concerns policy including any evidence of its effectiveness, e.g. with relevant data. The Director responsible for Safeguarding may also review an anonymised sample to ensure that these concerns have been handled appropriately

Safer Recruitment

The College is committed to safer recruitment processes. Members of the teaching and non-teaching staff at the College including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the College may undertake an online update check through the DBS Update Service.

Full details of the College's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the College's Staff, Supply Staff and Governor Recruitment & DBS Disclosure Policy.

The College's measures to meet other Safeguarding Responsibilities

Teaching children how to keep safe

The governing body ensures that all pupils are taught about safeguarding, including online, through the curriculum, PSHE, assemblies and ad hoc talks to help children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

Internet safety is an integral part of the College's ICT curriculum and also embedded in PSHE and sex and relationships education (SRE).

The College has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm. Further detail of Bedstone College's approach to online safety can be found in the Mobile Devices Policy and the E-Safety Policy, which identifies the College's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the College's systems.

Looked after children

The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority. Mrs Julia Richards is the designated member of staff who has responsibility for their welfare and progress and Mrs Carol Mullins has oversight of CLA pupils. The College ensures that the designated member of staff receives appropriate training in order to carry out their role.

The College will follow the guidance of the DfE document; 'Promoting the Education of Looked After Children':

[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/335964/Promoting the educational achievement of looked after children Final 23-....pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/335964/Promoting_the_educational_achievement_of_looked_after_children_Final_23-....pdf)

Arrangements for visiting speakers

The College has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The College's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the College and British values.

The College carries out background checks before agreeing to a Visiting Speaker being allowed to attend the College. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant. Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the College may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

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

Arrangements for one-to-one tuition

Where children are engaged in close one-to-one teaching, the staff behaviour policy has advice for staff such as peripatetic music teachers and sports staff with regard to one to one contact and appropriate touch for the purposes of effective instruction. All classrooms have vision panels and teaching timetables are publicised on College notice boards. Staff ensure they're teaching in a room with either viewing panel on the door, the door left open or a window which sees into the classroom.

Use of mobile devices and other internet and camera enabled devices

The College's policy on the use of mobile devices can be found in the Mobile Device policy, staff behaviour policy and ICT Acceptable Use Policy. Staff are made aware of pupils who can and cannot have their photo shared on a public forum. It is advisable that staff use College equipment to take pupils pictures or record video, however, in the event that this is impossible they must delete any images as soon as is practicably possible from their personal devices. Whilst supervising, teaching or in any contact situation with pupils, staff are not permitted to be using their phones. This includes teaching time, duties and

extended day. Mobile signal (3G and 4G) is extremely limited in school due to the rural location, so access to the internet is through College Wifi systems which are monitored and filtered.

Whistleblowing:

All staff are required to report to the DSL, any concern or allegations about College practices or the behaviour of colleagues which are likely to put students at risk of abuse or other serious harm. There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

There is a separate policy on 'Whistleblowing' which is covered as part of our induction for all new staff.

Senior Students:

Senior students who hold positions of responsibility over other students will be briefed on appropriate action to take should they receive any allegations of abuse. They will also be trained in how to deal with other students at the College.

Specific EYFS Guidance

Acceptable Use of Camera's and Mobile Phones

Our Junior School aims to nurture the very best in each child; we aim to provide a high quality teaching and learning environment. The Christian values of the College encourages care for all, mutual respect, responsibility and a strong partnership between home and school.

Aim

We intend to provide an environment in which children, parents and staff are safe from images being recorded and inappropriately used in turn eliminating the following concerns.

1. Staff being distracted from their work with the children.
2. The inappropriate use of mobile phones and cameras around the children.

We have a clear policy to adhere to on the acceptable use of mobile phones and cameras that is understood by all members of staff without exception.

Mobile Phones

Staff can bring their personal mobile phone to College. Members of staff must ensure that there are no inappropriate or illegal content on their device.

All staff must ensure that their mobile phones are left in the staff room inside their bags.

Mobile phone calls can be taken in the staffroom at break times.

If a personal emergency should occur, staff are allowed to take their mobile phone into the classroom. They must first seek permission from the Head.

The College hold details of each member of staff's emergency contact number of the next of kin.

All helpers will be requested to leave their mobile phone in their bag in the staffroom.

The College mobile phone will be taken for emergency purposes when out of the classroom.

It is the responsibility of all members of staff to remain vigilant and report any concerns to the Head.

1. Mobile phones must not be used to photograph children.
2. Mobile phones (to record audio or video) must not be used by parents in College, playground or on College visits.
3. The Head reserves the right to request to check the image content of a member of staff's mobile phone should there be any cause for concern.
4. Should inappropriate material be found the Head and/or the college DSLs will be contacted immediately.

Appropriate procedures will then follow.

Cameras

College cameras must be used or the school memory card. Memory cards should then be removed and the content loaded onto the school site.

The Head or someone authorised by her will be responsible for collating pictures to be included in any promotional material or other document.

No personal devices or cameras can be taken into the children's toilets.

Early Years: Disqualification under the Childcare Act 2006:

Bedstone College pays regard to the statutory guidance:

[Early years and later years \(under-8's\) childcare - Disqualification under the Childcare Act 2006 \(August 2018\)](#)

KCSIE now incorporates the above new statutory guidance. It concerns how people can be disqualified under the Childcare Act 2006, and explains the effect of the Childcare (Disqualification) Regulations 2009. In the 2018 revision, disqualification 'by association' has been removed for staff working in schools.

All new employees to the EYFS setting, and those who work in later years provision for children who have not attained the age of 8, are required to sign a declaration which addresses this regulation.

The College will ask all employees working in the EYFS setting, and those who work in later years provision for children who have not attained the age of 8, to sign an annual declaration which addresses this guidance.

This does not apply to volunteers or Governors

Contact numbers

All members of staff may make a referral if they believe that a child is at risk. The telephone number of the Shropshire Council Children's Services Departments is as follows:

The LADO is the Initial Contact Team Manager for the Local Authority. In reality, however, conversations will take place between a team of designated officers at the LA.

LADO (1 st point of contact team:	0345 678 9021 (Mon-Fri 9-5)
Out of Hours (Emergency Duty Team)	0345 678 9040
NSPCC	0800 800 5000
NSPCC (Whistle-Blowing helpline)	0800 028 0285 (help@nspcc.org.uk)
Report abuse in education helpline	0800 136 663 (help@nspcc.org.uk)
The non-emergency Police number:	101
DfE counter extremism helpline:	020 7340 7264
DfE mailbox for staff and Governors:	counter-extremism@education.gsi.gov.uk.

The following telephone number may be useful for students:

Childline	0800 1111
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It is also possible to report abuse online to the local council or via the NSPCC website:

<https://www.gov.uk/report-child-abuse-to-local-council>

<http://www.nspcc.org.uk/what-you-can-do/report-abuse>

If you feel that a child is in immediate danger please dial 999. Alternatively, if you believe that a child is at risk, you can call the non-emergency number at West Mercia Police, 101

Shropshire Safeguarding Children's board:

<http://www.safeguardingshropshireschildren.org.uk>

DBS referral *Disclosure and Barring Service, PO Box 181, Darlington, DL1 9FA*

Tel: 01325 953 795

Helpline: 03000 200 190

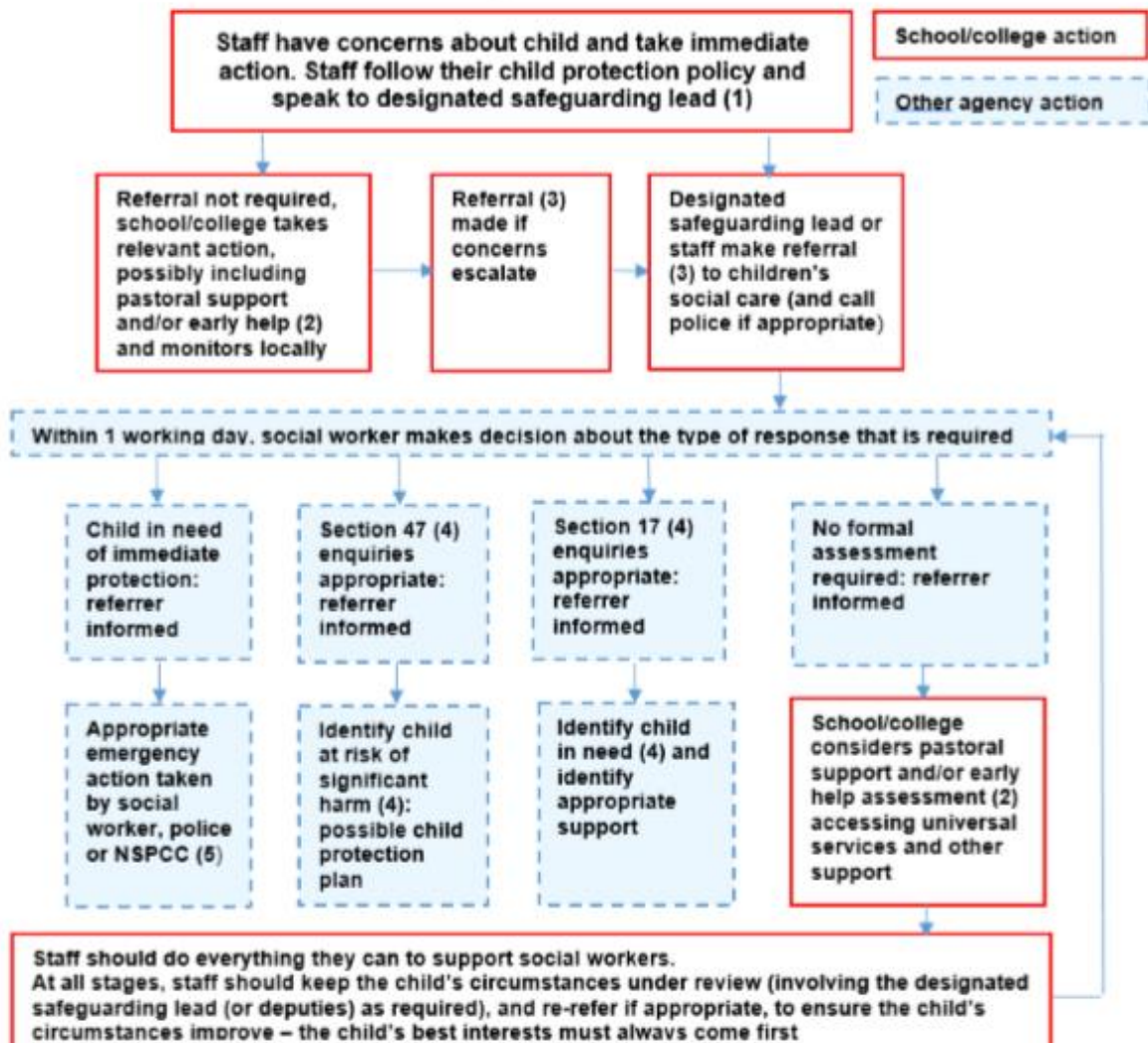
<https://www.gov.uk/government/organisations/disclosure-and-barring-service/about>

Teaching regulation Agency (TRA)

<https://www.gov.uk/government/organisations/national-college-for-teaching-and-leadership>

Appendix A – Referral Flowchart taken from KCSIE (2023)

Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

Appendix B – DSL Poster displayed around the College

Designated Safeguarding Officers

The following staff have Level 3 safeguarding qualifications and can be consulted in the event of any safeguarding concerns.



Mr Chris Braden
Deputy Head and DSL
01547 530303
Chris.braden@bedstone.org



Mr Alex Whitlam
Head of Student Wellbeing and Safeguarding
Deputy DSL
01547 530303
Alex.whitlam@bedstone.org