SAFEGUARDING POLICY

This policy applies across the College at all age ranges including Early Years, Prep and Senior Schools. It should be read in conjunction with the following policies:

- Anti–Bullying
- Attendance Policy
- Behaviour
- Employee Whistleblowing
- E-safety Policy for Staff
- ICT Acceptable Use and E-safety for Students
- Health and Safety
- Intimate Care Policy and Guidance
- Managing the Investigation of an Allegation of Abuse
- Medical and First Aid
- Mobile Phone Policy
- Mental Health and Well-Being Guidance
- Restrictive Intervention
- Preventing Extremism and Radicalisation
- Safer Recruitment
- Staff Code of Safe Conduct
- SEND
- Early Years Foundation Stage (EYFS) Statutory Framework
- Lettings and Premises Hire Policy

St. Columba's College is conducted in the educational tradition of the Brothers of the Sacred Heart. The school environment is best described by the term "sanctuary," a place where students sense the compassion which motivates those who care for them, where they feel safe to become the best person God created them to be.

Policy owner:	Designated Safeguarding Leads (Senior and Prep) **Mark Livesey – Senior** **Kevin Boland – Prep**
Date reviewed:	July 2026
Date of next review:	July 2027
Ratify by Governors:	Board

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Section 1 Introduction

St Columba's College strives to educate all its students within an environment where the Catholic traditions of learning, truth, justice, respect and community are promoted. Consequently, the overall aim of this policy is to safeguard and promote the welfare of all the children in our care. We recognise that all children without exception, have the right to protection from harm, regardless of gender, ethnicity, needs or beliefs. All systems, processes and policies operate with the best interest of the child at their heart.

This policy and guidance are consistent with the aims of the Government in safeguarding of children to:

a) protect children from maltreatment whether that is within or outside the home, including online
b) prevent impairment of children's mental and physical health or development
c) ensure that children are growing up in circumstances consistent with the provision of safe and effective care
d) take action to enable children in need to have optimum life chances

The College operates safeguarding procedures in line with locally agreed inter-agency procedures, as set out by Hertfordshire Safeguarding Children Partnership:
As an independent school, the College is subject to section 157 of the Education Act 2002 and the Education (Independent School Standards) Regulations 2014, which require the Headteacher to ensure that arrangements are made to safeguard and promote the welfare of pupils and that those arrangements have regard to guidance issued by the Secretary of State. Compliance with these requirements is inspected by the Independent Schools Inspectorate (ISI).

This policy pays regard to the following statutory guidance:

- KCSIE 2026
- Working Together to Safeguard Children 2026
- What To Do If You Are Worried that a Child is being Abused – Advice for Practitioners
- Safer Recruitment in Education
- RSHE Statutory Guidance, the Serious Violence Strategy 2018, and
- Prevent Duty Guidance 2023
- Standards for Filtering and Monitoring In Schools.
- https://www.hertfordshire.gov.uk/services/Childrens-social-care/Child-protection/Hertfordshire-Safeguarding-Children-Partnership/hscp.aspx
- Data Protection Act 2018 and UK GDPR –DPA/UKGDPR requirements
- Digital and technology standards in schools and colleges (April 2026)
- After school clubs, community activities, and tuition (safeguarding guidance for providers) (February 2026)

The Designated Senior Leaders (DSLs) for Safeguarding in the College are:

Mr Mark Livesey in the Senior school who can be contacted:
by telephone on 01727 855185 or by email at livesey.m@stcolumbascollege.org

Mr K Boland in the Preparatory School (including EYFS) who can be contacted in person, by telephone on 01727 855185 or by email at boland.k@stcolumbascollege.org

The nominated Deputy Designated Safeguarding Leads are

Mrs K Marson	deputy@stcolumbascollege.org
Miss R Hambly	Hambly.R@stcolumbascollege.org
Ms K Freeman	Freeman.K@stcolumbascollege.org, operational safeguarding

These members of the DSL Team deputise for one another when absent, responding to all concerns across all educational stages. However, in their absence any child protection concern must be referred to the Head.

The overall principal Designated Safeguarding Lead is Mr Mark Livesey.

The **Governor Responsible** for safeguarding at the College is Ms Martha Moroney who carries out the annual review. The Safeguarding Governor can be contacted via email at gov.admin@stcolumbascollege.org. The Governors also receive safeguarding updates at all Board meetings. The Chair of Governors can be contacted at chairofgovernors@stcolumbascollege.org.

Section 2 Principles

The main elements of the policy apply to all staff and governors by which we seek to:

a. Ensure the practice of safe recruitment in checking the suitability of staff (including Governors and Volunteers) appointed to the College
b. Raise awareness of child protection issues, so equipping children with the necessary skills needed to keep them safe through the Pastoral Programme to include topics such as grooming, counter bullying and on-line safety
c. Implement procedures for identifying and reporting cases, or suspected cases, of abuse in accordance with locally agreed interagency procedures
d. Support students who have been abused, in accordance with the terms of the policy
e. Establish a safe environment in which children can learn and develop
f. Provide the designated safeguarding lead and staff with relevant training and support
g. Make provision for immediate remedy to any deficiencies in practice, procedure and duties or improvements in policy and practice as they occur.
h. Promote and maintain an inclusive, anti-discriminatory culture in which racism, faith-based prejudice and other forms of discrimination are challenged, as part of our safeguarding responsibilities.

i. As per KCSIE, any child may benefit from early help, but all College staff should be particularly alert to the potential need for early help for a child who
    a. Is disabled or has certain health conditions and has specific additional needs
    b. Has special educational needs (whether or not they have a statutory Education, Health and Care plan)
    c. Has a mental health need
    d. Is a young carer
    e. Is pregnant and/or is a parent themselves
    f. Has exhibited early signs of abusive, violent and/or harmful behaviours
    g. 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
    h. Is frequently missing/goes missing from education, home or care, has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit 11
    i. Is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
    j. Is at risk of being radicalised into terrorism, has a parent or carer in custody, or is affected by parental offending
    k. Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
    l. Is misusing alcohol and other drugs themselves, is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
    m. Is a privately fostered child.

All staff should be aware of the indicators of abuse, neglect, exploitation and modern slavery, recognising that children can be at risk of harm inside and outside the home and school/college, and online. Professional curiosity and knowing what to look for are vital for early identification. Safeguarding issues rarely occur in isolation and often overlap. Staff, especially the designated safeguarding lead and deputies, should also be alert to extra-familial harm in its many forms, and to the significant role technology plays in many safeguarding concerns, with abuse frequently occurring online and offline at the same time.

Section 3 Procedures

Appropriate recruitment and selection procedures for staff in the context of safeguarding are the first line in protection of children and have been adopted fully by the College. Please see the Safer Recruitment Policy for more information.

The College maintains a Single Central Record of the pre-appointment checks carried out on all staff, and on supply staff, governors and, where appropriate, volunteers and contractors, in accordance with Part 4 of the Education (Independent School Standards)

Regulations 2014 and KCSIE. For members of the governing body this includes a section 128 check on their eligibility to take part in the management of an independent school.

The application of College policy

The nature of the regular contact with students on a daily basis means that the College staff are well placed to observe the outward signs of abuse. The school will therefore:

a) Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to
b) Ensure children know that there are individuals, adults and peers whom they can trust and approach to raise their concerns and they know and understand the systems in place for doing so
c) Refer any concerns to the DSL who then coordinates the required response, which may require in-house support or be referred to outside agencies as the case determines
d) Ensure that early help is provided in the speediest and appropriate way through liaison and cooperation with external agencies
e) Include opportunities in the Pastoral Programme for children to develop the skills they need to recognise and stay safe from abuse;
f) Ensure as part of the RSHE curriculum, the promotion of a zero-tolerance culture towards sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment
g) Operate clear and supportive polices related to drugs, alcohol and substance abuse
h) Operate clear and supportive policies in relation to e-safety and cyber bullying (see separate policies) to ensure that provision is made to teach children of all ages to keep themselves safe online, including AI.
i) Operate clear and supportive policies related to relationships including sexual aspects of relationships for both boys and girls
j) Ensure that whenever staff from another organisation are working with our students on another site, that the appropriate assurances have been received from the competent authorities within the organisation/s that appropriate child protection checks and procedures apply to those staff
k) External coaches and peripatetic teachers must have appropriate safeguarding and child protection policies and procedures in place. They are subject to DBS checks, are registered centrally by Human Resources, and adhere to safeguarding procedures, such as signing in when on site and knowing how to report safeguarding concerns
l) Operate robust Health and Safety procedures, ensuring that the school premises are as secure as circumstances and daily operation permits
m) Develop awareness in all staff of the need for Child Protection and their responsibilities in identifying abuse
n) Ensure that in the Senior school, Prefects and Peer Mentoring programme members are aware of their responsibilities in identifying abuse and the need to report it
o) Ensure all staff are aware of referral procedures within the school
p) Monitor children who have been identified as ‘at risk’
q) Ensure regular and timely liaison between the Counsellor and the DSL

r) Ensure the presence of an appropriate adult to support, advice and assist if a pupil is being questioned or detained by the police

Confidentiality
Students are actively encouraged to raise personal and general concerns with members of staff and senior students and seek advice in confidence.

It is important to note, however, that such discussions, whilst remaining confidential in nature, must take into account a full appreciation of duty of care. This means that information may have to be shared with senior members of staff or parents on a need-to-know basis, not as a breach, but as an extension of a confidence given.

This aspect of the policy applies if there is a risk of an individual becoming a danger to themselves or others. In such a situation a student is counselled and, if possible persuaded, that it is desirable for a confidence to be shared with others. This should not be a barrier for information sharing which is likely to happen regardless.

Equally, whilst the College pays due regard to the data protection framework, the UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025, some situations which have a safeguarding dimension do not necessarily fall within its remit. In this, as in all matters, the College's primary priority is the safety and interests of the child.

All staff with tutor responsibility, the Pastoral Team, Ministry Team and Counsellors have very particular roles in being available to all members of the community and in the case of the last mentioned, to offer confidential counselling.

CONFIDENTIALITY CANNOT BE GUARANTEED IN RESPECT OF CHILD PROTECTION ISSUES.

EYFS (Early Years Foundation Setting)
The practitioner responsible for safeguarding in the Early Years setting is Mr Kevin Boland (DSL for the Prep School).

In the EYFS pupils and staff are not allowed to use mobile phones or cameras in school. Staff are required to use school mobile phones and cameras where possible to capture images. The use of mobile phones in the EYFS setting to send or receive messages and phone calls by any member of staff, parent, visitor or pupil is also not permitted while the children are in the setting. When children in the EYFS setting go on a school trip, the school camera should be used to capture images of the children. Any volunteer helpers on the trip are made aware of this requirement before the trip commences.

More guidance on staff use of mobile phones in the rest of the college environment can be found in the Staff Code of Safe Conduct.

Section 4 Roles, Responsibilities and Training

Training needs are assessed periodically. The nature and intensity of training required depends upon the number and type of child protection issues experienced by the College.

All Staff

All Governors, staff and volunteers have a responsibility in school to be alert to the symptoms and triggers of abuse, neglect, exploitation or other safeguarding concerns, to share information and to work together to provide a safe environment where children can learn.

All new staff complete online Level 1 Child Protection training prior to joining the school and take part in the induction training throughout their first term (including DSL role and identity). Induction training also covers online safety, including expectations, roles and responsibilities in relation to filtering and monitoring. The College ensures all potential new staff are subject to a "digital screening" process prior to interview. They are informed of this when shortlisted. All staff read Part 1 of KCSIE with each new update, and sign to say they have done so and understand the contents (records retained by the Head of HR), this may include an online quiz or test. In addition, all staff receive regular training in Child Protection, Prevent and Online Safety, including understanding of the expectations, roles and responsibilities in relation to filtering and monitoring. Formal safeguarding training takes place at least annually as part of the INSET cycle and is further supported through regular refreshers led by the DSLs e.g. online courses, scenarios, policy sign off, covering all types of abuse as outlined in KCSIE as well as school specific needs. It also includes issues which are pertinent to girls such as Female Genital Mutilation and Forced Marriage. External coaches, invigilators and peripatetic teachers are provided with basic St Columba's specific training on safeguarding procedures.

Any member of staff with an issue or concern relating to the welfare of a child must discuss it with the DSL as soon as possible. Everyone who comes into contact with children and their families has a role to play in safeguarding children. School staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. Staff work with social care, the police, health services and other services to promote the welfare of children and protect them from harm, including providing as much information as possible as part of referral processes.

Staff must also understand that this responsibility applies not only to children at risk of significant harm but to those considered to be a "child in need". Such a child needs support to maintain a reasonable level of health or development, and prevent problems escalating. Where there is an immediate concern, all staff are empowered to act.

Staff must understand that they are under a legal duty regarding child protection:

a) To protect children from abuse and promote their welfare
b) To be aware of the possibilities which exist for child abuse and to be conversant with the College's practice and policy on child protection and adopt an "it could happen here" approach
c) To be trained in child protection procedures through appropriate induction training and regular refresher training
d) To know how to access and implement the College guidance and procedures, independently if necessary
e) To understand that they are not expected to be experts at diagnosis;
f) To appreciate that in dealing with a child protection issue they are to remain as objective as possible
g) To never assume they know in which categories the children are at risk;
h) To record information, contemporaneously, verbatim, if possible. Not to prompt, lead or suggest information to the child
i) To refer to the school's DSL (or in his/her absence, the deputy or other key staff) as immediately as possible
j) In the case of allegations brought against a colleague, including a trainee teacher, supply staff member, volunteer or contractor, to refer this to the Headmaster immediately, who then informs the LADO/Designated Officer
k) In the case of the allegation being made against the Head, the Chair or Safeguarding Governor must be informed immediately, who then informs the LADO.

All child protection/safeguarding concerns, discussions, decisions made and the reasons for those decisions and any outcomes must be recorded on the CPOMS system. Staff should discuss with the DSLs if in any doubt about the recording requirements.

If, at any point, there is a risk of immediate serious harm to a child, a referral must be made to children's social care or the police immediately. Parental consent is not needed. All staff know that any person can make a direct referral, using the contact details in Appendix 2 of this document. However, usually this is directed through the DSL (see below).

In exceptional circumstances where a DSL is not available, appropriate action should not be delayed. Staff members making a referral should consider speaking to a member of CLT or take advice from local children's social care.

Any action taken should be shared with the DSL as soon as practically possible. All staff are clear that they are empowered to refer if necessary. Further, if after a referral, a child's situation does not appear to be improving, the staff member with concerns should press for re-consideration either through the agency or the DSL or by further contact personally with social services. Concerns should always lead to help for the child at some point. Providing early help is more effective in promoting the welfare of children than reacting later.

Early Help

Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. This is delivered at two levels: universal services and community-based Early Help, for lower-level needs; and targeted Family Help, for children and families who require more intensive, targeted support.

Early help can be particularly useful to address non-violent Harmful sexual behaviour (HSB) and may prevent escalation of sexual violence.

Early help can prevent further problems arising, for example, if it is provided as part of a support plan. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care, and if appropriate the police, is made immediately.

All staff should be aware of the process for community-based Family Help assessments including targeted early help and statutory services

The Hertfordshire Continuum of Need will be referred to by the DSLs in their decision making around Early help and the criteria, including the level of need to determine the best support available. It may be that the College can offer early help services in a more efficient and timely manner than the local authority.

Some children and families may require more targeted support than that offered at the universal and community based Early Help level. The Families First Partnership (FFP) Programme Guide could be consulted to identify children and families who would benefit from more targeted support through Family Help. These will be recorded as normal on the students' safeguarding file.

Effective early help relies upon the school engaging and working with local agencies to:

1. Identify children and families who would benefit from early help
2. Undertake an assessment of the need for early help
3. Provide targeted early help services to address the assessed needs of a child and his/her family which focuses on activity to significantly improve the outcomes for the child.

Local authorities, under section 10 of the Children Act 2004, have a responsibility to promote inter-agency cooperation to improve the welfare of children.

Staff must understand that they may be required to support other agencies and professionals in an early help assessment. This responsibility may involve liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment. Such early help assessments should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment.

It must be remembered that the Data Protection Act is not a barrier to sharing but provides a framework to ensure that personal information about living persons is shared appropriately.

All staff and volunteers must feel able to raise concerns about poor or unsafe practice and potential safeguarding failures in the College's safeguarding regime and that such concerns are taken seriously by the College Leadership Team. Concerns must be taken to the DSL and recorded and dated. The DSL will raise the concern at Leadership level for discussion. The staff member must feel confident that when this happens a formal response is communicated within a reasonable time scale. If a staff member feels that the response is not forthcoming within a reasonable time scale the matter is to be raised with the Head for response.

Permanent, temporary, voluntary and supply staff training

Permanent, temporary, voluntary and supply staff are made aware of the child protection arrangements and procedures in place within the College through induction in the form of:

a) A presentation by one of the DSLs re the safeguarding arrangements at the College
b) The College Safeguarding Policy (indicating the names of the DSLs)
c) The Staff Code of Safe Conduct
d) The Whistleblowing Policy
e) Part one of KCSIE
f) The ICT Acceptable Usage Policy
g) The Behaviour Policy
h) Children Missing Education Statutory Guidance
i) Staff Acceptable Use and E-safety Policy

Designated Senior Leader (DSL)

The DSLs are members of the College Leadership Team. Care is taken to ensure that they can complete their role effectively. The DSLs, including deputies, complete Level 3 Child Protection training every two years in addition to other CPD opportunities as relevant.

The main responsibilities are outlined below:

a. To ensure that all staff know the **nominated individuals** responsible (and in their absence the Deputy DSL or Head) for Safeguarding issues
b. To be available to all staff for consultation on child protection issues, including online safety
c. To take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).
d. To seek advice from relevant authorities and co-ordinate action where child abuse is suspected
e. To report to the appropriate agency any allegation of abuse within 24 hours of the decision being made to report

f. To liaise with those Safeguarding Officers appointed by the different authorities with which the school may need to form a relationship over safeguarding issues and the LADO for Hertfordshire as appropriate
g. To facilitate ongoing and regular training on safeguarding for all staff at the College
h. To review the College's Policy on safeguarding with the Head, Link Governor and College Leadership Team on an annual basis and present changes for ratification to the Governors' Education, Strategy and Policy committee who then recommend it to the full Board for adoption at the next full Board meeting;
i. Where appropriate to take part in child protection conferences or reviews. In the case of non-attendance to ensure that a key member of staff attends. Where this is not possible, to provide a written report to the conference from the College
j. To maintain records of relevant information on CPOMS (except historic files, which are stored separately and securely) and to disseminate information about the child as appropriate;
    - Record to include
        i. A clear and comprehensive summary of the concern
        ii. Details of how the concern was followed up and resolved including rationale
        iii. If a decision not to refer is made, the reasons behind this is logged
        iv. Notes are kept of any action taken, decisions reached and the outcome
k. To inform the relevant authorities when a child moves to another school and to share any child protection files (when requested) within 5 days of transfer
l. To inform CME (Children Missing in Education) when a child moves or is withdrawn from the College at any stage of the school year, with the exception of students not returning to 6th Form (post-16) and we are not aware/have not been informed of their destination school.
m. To raise staff awareness and confidence of safeguarding procedures and to ensure new staff are aware of these procedures through induction training and specifically the new staff seminar programme
n. The DSL is the Prevent lead and ensures that staff have appropriate Prevent training and induction
o. Ensure the management of the shared safeguarding mailbox (safeguarding@stcolumbascollege.org) To ensure robust arrangements are in place for DSL cover when the DSL and deputies are unavailable so that safeguarding concerns can always be raised and acted upon without delay

Governing Body Responsibilities

The Governing Board must ensure it complies with its duties as defined by legislation. It must also have in place appropriate protocols and procedures to ensure policies related to safeguarding and its effectiveness are in place and that the relevant training required by staff is effective and complies with the law at all times. All governors must complete appropriate safeguarding and child protection training at induction. This equips them to support robust whole College approach to safeguarding. Training is regularly updated.

The Governors must ensure that the College contributes to inter-agency working to include local authorities and any interagency safeguarding procedures as may be set up by safeguarding partners in line

A nominated member of the Board of Governors, Ms Martha Moroney is identified as the Safeguarding and Attendance Lead Governor. The nominated allergy governor is Mr Dominic Keogh. Both can be contacted through gov.admin@stcolumbascollege.org.

The Chair of Governors is to liaise with local authorities and partner agencies on issues of safeguarding in the event of allegations of abuse made against the Head.

The Governors ensure that opportunities are found through teaching and learning and generally as an element of a broad and balanced curriculum that students experience safeguarding education.

The Governors must also take steps to ensure that

a) individuals who pose a risk of harm to students are not employed;
b) procedures are in place to manage allegations against staff members and volunteers;
c) procedures are in place to manage allegations against other children.

The Governors must ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual children by ensuring that there are systems in place for them to express their views and provide feedback.

Section 5 Child Abuse: Nature, Categories and Definitions

There are four main categories: Physical, Emotional, Sexual and Neglect: Definitions are taken from "Working Together to Safeguard Children 2026"

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children, commonly called child-on-child abuse. All staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. SEND students can be particularly vulnerable to abuse, including child-on-child abuse and their additional barriers to recognising abuse or neglect with these children, including assumptions regarding indicators of possible abuse (i.e. behaviour, mood, injury) as relating to the child's condition without further exploration. Abuse can take place online and technology may be used to facilitate offline abuse. Other groups of students who can be especially vulnerable to abuse include; those at risk of FGM or forced marriage, those at risk of CSE, those who run away or go missing. Behaviours linked to issues such as drug taking and or alcohol misuse, unexplainable and/or persistent absences from education,and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

Staff should be clear to understand that in disclosure of alleged abuse cases they are not making a diagnosis, only receiving concerns. None of the signs listed below may actually prove that a child is being abused and these indications should not be taken as proof. They MAY be indicators, which when put into context, provide justification for action.

Physical Abuse

This is the physical injury to a child where there is definite knowledge or reasonable suspicion, that the injury was inflicted or knowingly not prevented. This can include for example, non-accidental cuts, hitting, shaking, throwing, bruises, wounds, burns fractures, bites, poisoning, attempted drowning, attempted suffocating, or otherwise causing physical harm. Physical harm may also be caused when an adult fabricates the symptoms of, or deliberately induces, illness in a child.

Possible signs of physical abuse are:

1. Unexplained injury or refusal to explain or discuss them
2. Cigarette burns
3. Long bruises (possibly made by a belt)
4. Teeth marks
5. Fingertip / nail / slap marks or bruises
6. History of bruises / injuries with inconsistent explanations
7. Bilateral black eyes
8. Self-destructive comments, possibly repeated, or tendencies
9. Aggression towards others
10. Untreated injuries
11. Fear of medical treatment
12. Unexplained or unaccounted for patterns of absence (to avoid exposure of injury).

Emotional Abuse

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

Its diagnosis will require medical, psychological, psychiatric, social and educational assessment. It is accepted that all abuse involves emotional abuse but this category supersedes only when it is the main or the sole form of abuse.

Possible signs of emotional abuse are:

1. The child is developmentally delayed
2. Inappropriateness of social responses
3. Self-mutilation
4. Extreme passivity or aggression
5. Truanting from school or running away from home
6. Drug or solvent abuse (either in the child or in its principal carer/s)
7. Excessive fear of situations of people
8. Social isolation
9. Depression
10. Pressure (possibly when carers are unstable emotionally or behaviourally)

Sexual Abuse

Sexual abuse involves forcing, causing or inciting a child or young person (legally under 18) 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 penetration digitally or with an object) 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 involved 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 can take place online as well as offline, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education, and all staff should be aware of it and of the College's policy and procedures for dealing with it (see Section 7, Child-on-child Abuse). There are specific offences for children under 13, who can never provide valid consent to sexual activity, and separate offences confirming that sexual activity involving a child under 16 is an offence regardless of whether they agreed to it.
This section is also relevant to identification of victims of Sexual Harassment and Sexual Violence and Harmful Sexual Behaviours (HSB) and their associated definitions.

The key elements in any definition of sexual abuse are:

a) The betrayal of trust and responsibility
b) Abuse of power for the purpose of the sexual gratification of the abuser
c) The inability of the child to consent. A single non-consensual kiss, or the touching of a person's bottom, breasts or genitalia, however transient, can constitute a sexual assault.

Possible signs of sexual abuse are:

1. Depression, suicidal tendencies, self-harming
2. Anorexia or bulimia
3. Acting in a sexually inappropriate manner towards adults/peers
4. Pregnancies
5. Truanting/ running away from home
6. Seeking guidance for a "friend with a problem of abuse".
7. Sexually abusing a younger child / sibling
8. Sudden changes in school or work habits
9. Fear of people
10. Abnormal precociousness or aggression
11. Chronic medical problems (stomach pains / headaches)
12. Withdrawal, excessive self-isolation
13. Genital / abdominal or anal injury or pain
14. Reluctance to undress for Games/PE
15. Sexually transmitted diseases

Most sexual abuse is committed by individuals known to the victim however there are some occasions where this can be committed or facilitated by an organised network or gang and victims might feel part of this group.

Under no circumstances can under-age sex issues remain secret. In the case of a disclosure of sexual abuse, the DSL will likely seek advice and refer to social services and/or the police.

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 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.

Possible signs of neglect are:

1. Failure to thrive (looks thin, emaciated, unwell, below average height, weight)
2. Unusual hunger
3. Has regular accidents especially burns
4. Poor personal hygiene
5. Avoidance of school medicals
6. Tiredness
7. Reluctance to go home
8. Poor social relationships
9. Frequent lateness / non-attendance
10. Inappropriate clothing

Exploitation
All school and college staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

Mental Health
All staff should be aware that mental health and behaviour problems can be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Staff are well placed to observe children's behaviour however only appropriately trained professionals should attempt to make a diagnosis. If staff have a mental health concern that is also a safeguarding concern, immediate action should be taken. Potential warning signs that a child may be struggling with their mental health include significant changes in behaviour, ongoing difficulty sleeping, withdrawing from social situations, no longer wanting to do things they usually enjoy, and physical signs of self-harm or self-neglect. Not every child who exhibits these behaviours is at risk, but staff should always report such observations to the DSL. Where appropriate and provided doing so would not expose the child to additional risk, the DSL will consider informing parents or carers to support the child's wellbeing.

If staff feel that a child is in danger, they must call 999 or arrange for the child to be taken to A&E immediately by a parent/carer or other suitable person. Where a child needs urgent help for their mental health but it is not an emergency, staff can seek help from NHS 111 online or call 111 and select the mental health option. More information can be found in Mental Health and Behaviour in Schools Guidance.

Serious Violence
Serious violence is a continuing safeguarding concern. It may involve physical assault, or carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. All staff must report any concern about a child carrying or using a weapon, or expressing an intent to do so, to the DSL (or a deputy) immediately.
The DSL will assess the risk to the individual pupil and to others in the College, taking into account wider information or concerns, and take appropriate action. Depending on the risk this may include a safety and support plan and, where relevant, steps to de-escalate peer conflict. Staff should be alert to signs that a child may be at risk of, or involved in, serious violence, recognising that this risk is higher for children with disrupted education (for example suspensions, exclusions or time in alternative provision) or a history of offending, and should be alert to the times when children may be at greatest risk, such as immediately after school.

Section 6 Specific Types of Safeguarding Concerns

Radicalisation

The Counter-Terrorism and Security Act 2015, Prevent 2023 and KCSIE place a duty on schools and therefore staff members to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). The Act also places a duty on local authorities to ensure Channel panels are in place. The panel must include the local authority and chief officer of the local police. Panels assess the extent to which identified individuals are vulnerable to being drawn into terrorism, following a referral from the police and where considered appropriate and necessary consent is obtained, and arrange for support to be provided to those individuals. The Act requires partners of Channel panels to cooperate with the panel in the carrying out of its functions and with the police in undertaking the initial assessment as to whether a referral is appropriate. Schools are listed in the Act as partners of the panel.

The College takes seriously its responsibilities with regard to tackling extremism and preventing radicalisation (including via online activities) and addresses these matters through the curriculum and pastoral programmes for the students. It undertakes the necessary training and guidance required for staff to be able to respond appropriately. A separate policy "Prevent and Extremism" provides the detail of response in full to safeguard our students. Additional support is also available to schools in the form of e-learning modules produced by the Department for Education

Child Sexual Exploitation & Child Criminal Exploitation

Both CSE and CCE are forms of abuse where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. This could be committed or facilitated by an organised network or gang, as well as individuals, and victims may identify as part of this group. Staff should be aware of the links to modern slavery. Power imbalance can be due to a range of factors including age, gender, sexual identity, cognitive ability, physical strength, status, economic or other resources. CSE can involve violent, humiliating and degrading sexual assaults. Both boys and girls can be victims, although indicators of CSE and CCE may not be the same. Children who are being criminally exploited may be at higher risk of being sexually exploited. In some cases, young people are persuaded or forced into exchanging sexual activity for something the victim needs or wants, such as money, drugs, gifts, affection or status.

Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Children who are exploited should be treated as victims and may be criminalised for actions they were coerced into undertaking as part of their exploitation. CSE can apply to 16 and 17 year olds, who can legally consent but may not realise that they are being exploited. Abuse can be perpetrated by group or individuals, both boys and girls and children or adults, including family members. If the latter, then siblings may need additional support, Child Sexual Exploitation 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. Occurrence can be over time or as a one-off and may be without the child's immediate knowledge. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to serious violent crime or to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. The College is vigilant to absence or behaviour arising as a result of this issue and liaises with the Police and other specialist agencies in the event of concerns. All staff should be aware of indicators which may signal that children are at risk from or are involved with serious violent crime. Child criminal exploitation can also include financial exploitation.

Some of the following signs may be indicators of sexual or criminal exploitation. Those who:

a) appear with unexplained gifts or new possessions;
b) associate with other young people involved in exploitation;
c) have older boyfriends or girlfriends;
d) show a significant decline in performance at school
e) suffer from sexually transmitted infections or become pregnant;
f) show signs of self-harm or suffer from changes in emotional well-being;
g) show signs of assault or unexplained injuries
h) who misuse drugs and alcohol;
i) go missing for periods of time or regularly come home late; and
j) regularly miss school or education or do not take part in education.

Risk factors which increase the likelihood of involvement in serious violence include being male, frequent absence or permanently exclusion from school, experience of child maltreatment or involvement in offending, such as theft or robbery.

Honour or Faith-Based Abuse

Honour or faith-based abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or the community. All forms of this are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff are to speak to the DSL. If staff have a concern regarding a child that might be at risk of HBA they should activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

Female Genital Mutilation and Forced Marriage

Female Genital Mutilation (FGM) is the collective name given to a range of procedures involving the partial or total removal of external female genitalia or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. FGM is carried out on girls of any age, so school staff are trained to be aware of risk

indications. Many such procedures are carried out abroad and staff should be especially alert to concerns expressed by girls about long holidays abroad in the summer. Forced marriage, marriage or civil partnership under the age of 18, virginity testing, hymenoplasty and practices such as breast ironing are all forms of abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt staff should speak to the DSL. In addition, there is a specific legal duty to teachers in relation to FGM. If a teacher discovers that an act of FGM appears to have been carried out on a girl under 18, the teacher must report it to the Police.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA or FGM, or already having suffered HBA or FGM.

Online Safety including Phones and Filtering and Monitoring

Given the increasing trend to work online, it is essential students are safeguarded from potentially harmful and inappropriate online material. The College has filters and appropriate monitoring systems in place. A review of their effectiveness is carried out at least once every academic year by the DSL team with the support of the IT team, and includes checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks is kept. These block harmful and inappropriate content without unreasonably impacting teaching and learning. In addition, key members of staff including DSLs receive very regular reports to help meet the safeguarding needs of students.

Online safety is taught as part of safeguarding, through teaching and learning opportunities. All members of staff should regard internet activity as a safeguarding matter by ensuring that recommended sites and research areas are appropriate, within a general awareness of the potential for online abuse including grooming, child sexual exploitation, cyber-bullying and online radicalisation, among other harmful online activities. We recognise that online abuse can occur wholly online or be used to facilitate abuse in real life. In the Pastoral Programme and IT lessons, students are taught how to keep themselves safe online. Teachers have a responsibility to educate parents as well as students about the potential dangers that are present online.

The breadth of issues within online safety can be categorised into four areas of risk:

1. **content**: being exposed to illegal, inappropriate or harmful material, including content generated using AI
2. **contact:** being subjected to harmful online interaction with other users, or with generative AI applications that simulate such interaction
3. **conduct**: personal online behaviour that increases the likelihood of, or causes, harm, including making, sending or receiving explicit images (including those generated using AI).
4. **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The College recognises that students and staff are able, via their personal devices and mobile phone networks, to access materials which cannot be limited or restricted. As such, the behaviour policy (for students) and the Staff Code of Safe Conduct detail safeguards for use of personal devices whilst in school.

In line with the Department for Education's guidance Mobile phones in schools, the College is a mobile phone-free environment by default throughout the school day via the use of mobile phone pouches. This includes lessons, the time between lessons, breaktimes and lunchtime, with any exception permitted only by explicit arrangement. Please see the Mobile Phone Policy for further details

Where Generative AI is used, whether teacher-facing or pupil-facing, the College follows its own policy on AI which incorporates the Department for Education's guidance Generative Artificial Intelligence in Education. Staff are directed to approved resources on identifying and mitigating the associated risks to safeguarding, ethics, data protection and intellectual property.

Students are educated on AI-generated content, Deepfakes, AI-generated intimate images, Harmful interactions with AI systems, Technology-facilitated abuse and exploitation as part of their online safety education.

All AI related safeguarding incidents are dealt with through our normal safeguarding protocols.

Further guidance can be found in the E-safety Policy for Staff and ICT Acceptable Use and E-safety for Students.

Children Missing Education

All children, regardless of their circumstances, are entitled to a full-time education, which is suitable to their age, ability, aptitude and any special educational needs they may have. Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues. Analysis of attendance data and liaison with parents takes place regularly in order to reduce the risk of children missing education in the future. A child going missing from education is also a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation, radicalisation, forced marriage or FGM. The Admissions Office ensure that new students are added to the School Roll on arrival and onto the MIS system. Attendance is then monitored and where issues arise, parents and the local authorities are notified as appropriate. When students leave the school, they are removed from the Roll and the local authorities are notified with their intended destination. Unexplained or prolonged absences are followed up via phone calls and if contact cannot be made, the local authorities are informed. As far as possible, we hold more than one emergency contact number for each pupil, so that contact is facilitated.

Child Abduction and Community Safety Incidents
Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

Domestic Abuse
Domestic abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Staff should also be aware that children may cause harm to other family members, sometimes referred to as child-to-parent or caregiver abuse, and that this can itself be a safeguarding indicator.

The College might liaise with the Police and other agencies in cases of domestic abuse to support the students concerned.

Operation Encompass is a national scheme, now a statutory duty, under which the Police notify the College when a child has been present at, witnessed, or otherwise been affected by a domestic abuse incident. Notifications are made to the DSL (or, in their absence, a Deputy DSL) and should reflect the voice of the child. On receipt of a notification the DSL will consider what support the student may need and ensure relevant staff are informed on a need-to-know basis. All such information is handled in accordance with data protection laws. A notification does not replace, and should not delay, a referral to children's social care where a child has been harmed or is at risk of harm.

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. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families.

Children with family members in prison
Hundreds of thousands of children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

Looked-after and previously looked-after children
The most common reason for children becoming looked after is because of abuse and/or neglect, and such children can be particularly vulnerable. The College ensures that staff

have the skills, knowledge and understanding to keep looked-after and previously looked-after children safe.

Currently the College does not have any students who fall into this category however this would be dealt with by the DSL team who would complete the role of Designated Teacher, should the need arise. The Designated Teachers would work with the local authority Virtual School Head to promote their educational achievement. Appropriate staff have the information they need about a child's looked-after legal status, contact arrangements with birth parents or others with parental responsibility, and the child's care arrangements.

Modern Slavery
Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. This has links to Child Criminal Exploitation and Child Sexual Exploitation and staff should be aware of the overlaps.

Cybercrime
Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

Homelessness
Homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

Temporary Accommodation
Where a child is placed in temporary accommodation, the local housing authority has a duty to notify the College (with the family's consent). The DSL will treat any such notification as safeguarding information, consider what additional support the student may need, and make a referral to children's social care where the child's circumstances warrant it. These notifications are managed through the same confidential arrangements as Operation Encompass notifications.

Young Carers
The College is alert to the needs of young carers, recognising that caring responsibilities can affect a child's attendance, attainment, behaviour and wellbeing. Early identification is essential so that young carers receive support at the right time from the appropriate

services, which may include additional support from external partners or from local authority and health services. Pastoral staff work hard to identify those who could be classified as young carers and work with the families to make referrals to support services.

Children with special educational needs, disabilities or health issues
Children with special educational needs or disabilities (SEND), or certain medical or physical health conditions, can face additional safeguarding challenges both online and offline. The College recognises that additional barriers can exist when identifying abuse, neglect and exploitation in this group. These can include: assumptions that indicators such as behaviour, mood or injury relate to the child's condition without further exploration; these children being more prone to peer isolation or bullying (including prejudice-based bullying); the potential for signs to be masked and not outwardly shown; communication barriers and difficulties in reporting; the need for intimate care, or isolation from others; greater dependence on adults for care; and difficulty in distinguishing fact from fiction in online content.

Any report of abuse involving a child with SEND requires close liaison between the DSL (or a deputy) and the SENCO. The College considers extra pastoral support and attention for these children.

Safeguarding children with medical conditions
An incident relating to the management of a child's medical condition (including allergies) would not, in and of itself, warrant a safeguarding referral. A referral would only be needed where an incident raised concern that the child might be at increased risk of neglect, abuse or exploitation because of their medical condition, for example where relevant information about the condition is not provided to the College, or where a child is repeatedly sent in without essential medication. Further information is provided in the statutory guidance Supporting Pupils at School with Medical Conditions.

The College is aware of its responsibilities around allergies and these are managed through the College's Allergy Lead Mr Kevin Boland and the Nominated Allergy Governor, Mr Dominic Keogh.

Children who are Lesbian, Gay, Bisexual, or Gender questioning
A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

When supporting a gender questioning child, a cautious approach is taken and consideration of the broad range of their individual needs, including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Staff endeavour to reduce additional barriers faced and encourage students to speak about any concerns related to gender questioning or sexuality.

It is not for the College to initiate any action in relation to a child's gender; this guidance applies where a child or their parent has requested support, including any request relating to social transition. When responding to such a request, the College takes an individualised, child-centred approach that considers the full range of the child's needs, remains professionally curious, has regard to any available clinical advice, and documents its decision-making with records kept.

The College complies with its obligations under the Equality Act 2010 and the Human Rights Act 1998 alongside its safeguarding duties. In line with those duties, and as set out under 'Single-sex facilities and sport' below, children must not use toilets, changing rooms or accommodation, or participate in single-sex sports, which are designated for the opposite biological sex where these are provided for reasons of safety, privacy or fairness.

Single-sex facilities and Sport

The College provides single-sex toilets for children aged 8 and over, in line with the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, and separate changing accommodation and showers and changing facilities for children aged 11 and over, in line with Keeping Children Safe in Education 2026. Children must not be permitted to use toilets, changing rooms or showers designated for the opposite biological sex, including where the College is responding to a request to support any degree of social transition.

Where a gender-questioning child does not wish to use the facilities designated for their biological sex, the College will consider whether it can provide an alternative facility, for example a self-contained, lockable individual room, or access at an alternative time, without compromising the provision of single-sex facilities or the safety, comfort, privacy or dignity of that child or of any other child. A clear record of such arrangements is kept, communicated appropriately and reviewed regularly.

Some sports are taught and played in single-sex groups. Where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa), the College may separate children according to their biological sex. Where single-sex sport is necessary for reasons of safety, there are no exceptions, and children must not participate in sports designated for the opposite biological sex.

Host families (homestay) and exchange visits

Where the College arranges for pupils to stay with host families as part of an exchange visit or similar activity (sometimes called homestays), it applies the same safeguarding standards as apply on its own premises. Specific risk assessments will be undertaken prior to trips involving hosting. The College makes appropriate checks on the host family members with whom pupils are placed, gives pupils the contact details of a member of staff they can reach if they have a concern, and ensures that any concern arising during a placement is reported to and managed by the DSL.

Section 7 Child-on-child Abuse (including bullying, harassment and violence)

All staff must be aware that safeguarding issues can manifest themselves via child-on-child abuse. Staff should recognise that racism, faith-targeted abuse and other discriminatory behaviour can have a significant impact on a child's welfare, wellbeing and sense of safety, and should be considered as part of safeguarding practice. This is most likely to include, but not limited to: bullying (including cyber bullying, prejudice based and discriminatory bullying), discriminatory behaviour including racism and faith-targeted abuse, physical abuse (including hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm), physical assault and harm, or the threat of harm with a weapon, sexual abuse including in intimate personal relationships, verbal abuse e.g. racist, sexist or homophobic remarks, threats or name-calling; and emotional abuse e.g. isolating an individual from activities and social acceptance of the peer group, harmful sexual behaviour, sexual violence and sexual harassment which may include misogyny/misandry, causing engagement in sexual activity without consent (such as forcing someone to strip, touch themselves sexually or engage in sexual activity with a third party), the making or sharing of nudes and semi-nudes (whether consensual or non-consensual, including those generated using AI), upskirting and initiation/hazing type violence. It may include an online element which facilitates, threatens or encourages abuse. Both perpetrators and victims can be of either gender (although it is statistically more likely that girls will be victims and boys perpetrators), and child-on-child abuse can happen both inside and outside school, and online. SEND students are more prone to child-on-child abuse, bullying (including prejudice-based bullying) and isolation than other children. There is the potential for these students to be disproportionately affected without showing outward signs and communication barriers/difficulties can exist in managing/reporting these incidents. In any school, it is important to remember that even with no cases of child-on-child abuse, it may still be taking place and is not being reported.

Upskirting typically involves taking a picture or video under a person’s clothing without their knowledge, with the intention of viewing their genitals or buttocks for sexual gratification or to cause the victim distress or humiliation. Victims may be male or female, adults or children. This is now a criminal offence, as is the taking or sharing of nude photographs of people under eighteen. All incidents involving the making or sharing of nudes and semi-nudes require a safeguarding response from the College, whether or not the images were shared consensually.

Harmful Sexual Behaviours (HSB) can also be classified as child-on-child abuse and will be treated with the severity warranted. This will likely be determined on a case-by-case basis. All staff should report any suspected HSB to the DSL team who will have due regard for both the victim and perpetrator. The DSL team will ensure that incidents are identified, recorded and addressed appropriately using a HSB continuum. This will be suitably risk assessed to ensure mitigations can be implemented in a timely manner. Depending on the severity, a referral to children services and/or the police may be warranted. It is likely that students displaying HSB will be risk assessed using the Hertfordshire model (RAMP) or a Safety and Support Plan. These will be shared with parents.

Child-on-child abuse can sometimes be preventable, and timely, evidence-based support can prevent children from progressing to abuse or violence. All forms of Child-on-Child abuse may involve serious violence or weapons.

Staff must be clear that the activities above are unacceptable and not to be tolerated (zero tolerance), or passed off as “banter”, “just having a laugh”, “part of growing up”, or “boys being boys”, They are instead to be investigated fully and responded to befitting the nature and seriousness of the abuse.

It is the responsibility of all staff to help prevent and respond to child-on-child abuse in line with school policy. All staff are therefore given training to respond appropriately, manage effectively and report sexual violence or sexual harassment. Students are made aware that this form of abuse can have legal consequences. In order to minimise child-on-child abuse, staff and students are educated directly and indirectly through the school ethos, Pastoral Programme and counter-bullying measures.

In dealing with abuse by one or more student against another student (and where appropriate) staff are trained to:

a) Respond immediately and directly, with the explanation as to why this type of behaviour is not acceptable
b) Inform the DSL, via a write-up on CPOMS, and follow the referral process as per Flowchart 1 of this document. If in any doubt, speak with the DSL
c) Encourage all students to talk to or confide in a member of staff about any instances that make them feel uncomfortable or threatened
d) Reassure victims that they are being taken seriously and will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or harassment.
e) Respect confidentiality where appropriate. However, the child is informed that it may be necessary to disclose the information to other people in order that appropriate action can be taken
f) Ensure that children should know that making staff aware of a problem is not ‘sneaking’ or ‘telling tales’ etc. and should be reassured that they are not being disloyal to their peers
g) Always discourage retaliation both in person and online
h) Where appropriate, inform parents and put in place appropriate disciplinary proceedings
i) Monitor those involved (perpetrator, victim and any others) and check periodically to ensure that all are being supported and the abusive situation not returned to in any respect.

Local agencies are included in the response to cases where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm.

Section 8 Dealing With Disclosures Of Being Abused, Exploited or Neglected

REMEMBER: The determination as to whether or not abuse has taken place is a task for the professional child protection agencies, following a referral from the DSL. However, all staff must understand their responsibility to act immediately if they have any concern for the welfare of a child.

PROCEDURE: RECEIVE, REASSURE, REACT, EXPLAIN & RECORD

Receive Information

1. Remain objective: until other agencies are brought into operation, the child is simply alleging that something has taken place. It may be the case that the child has an ulterior motive in making an allegation.
2. Accept what you are told: it is not your responsibility to investigate its truth or otherwise decide if the information is correct.
3. Listen without reaction, particularly without displaying shock or disbelief. To do so could affect the child and prevent the disclosure of information.

Reassure The Child

1. Acknowledge the child's courage and strength in deciding to disclose the information. The step of disclosure is in itself often the most difficult for a young person to take and will have been the subject of a great deal of thought before being anywhere near confident of doing so.
2. Remind them that they are not to blame for what is happening: the child is the victim and often has a very low self-esteem because of this. However, do remember that the alleged perpetrator is often a person that the child loves and respects so to criticise their conduct will be counter-productive. It is vitally important to suspend any form of judgement.
3. Do not promise confidentiality: given that the safety of the child is paramount, a member of staff cannot give the cast-iron assurance that the information presented does not need agency investigation. To offer such a commitment and to renege on it would break the trust between the student and the school. This would become a complicating factor in having to work with the parents and children at a later date should abuse be proven
4. Do not promise that everything will be all right. This obviously may not be true and to heighten expectations can be as devastating as to the outcome of the allegations.

React

This is the most skilled part of the initial disclosure of allegation:

1. Respond to what the student has said but do not interrogate.
   Avoid leading questions such as: "Was it your father?" "Did this take place on Tuesday when you were away?" Defence counsel in a subsequent court case to show that the staff member "contaminated" the child's evidence can use questions posed in this way.
2. Questions must be open ended e.g.
   "Do you want to tell me anything else?"
   And? Who did this? When was this? How did it happen?

Any other things you want to tell me?

3. Could you go over the detail again to see if you have forgotten anything?

TED questions can be usefully applied

T = tell me what happened

E = Explain to me what happened

D = Describe to me what happened

Never ask WHY

Reflect/seek clarification as outlined in the last question. If the situation allows this at all it will be helpful in enabling you to decide whether this is a child protection issue or not e.g. "Can I be clear about the detail of what you are saying?"

There is a careful judgement to be made in ensuring that you have enough information to make an appropriate referral and allowing a young person to talk without being silenced, whilst making sure that you do not inadvertently lead the child, perhaps by assumption and unintentionally, by the nature of the question. For example, asking: "Were you sitting up or lying down when this happened?" contains the answer to the question. "What was the position you were in?" allows the information to unfold.

Explain

What you intend to do next. This must focus on the process the College adopts and contacting the designated person within the school

Record

- Make brief notes. This must be done as soon as possible after the meeting and within one hour of the disclosure. This may be possible in the meeting itself but it would be advisable to ask permission of the child in the first instance
- Write up your notes in full on CPOMS. Use the exact words of the child as much as possible. Note the questions you may have asked with the response under them. Describe observable behaviours (physical agitation, crying, silences) etc
- Share with the DSLs and relevant key staff (HoH, nurse etc)

Section 9 Allegations Against College Staff including Out of Hours Providers

All staff have a role in creating and ensuring a culture of openness, trust, and transparency within the College. Sharing information ensures the College values and expected behaviours are lived out day-to-day by the whole community.

If staff have a safeguarding concern or an allegation is made that another member of staff (including supply staff, trainee teachers, volunteers and contractors) has harmed or poses a risk of harm to children, this should be referred to the Headmaster, who will consider whether an onward referral to the LADO is required.

Allegations against members of staff (including supply staff, volunteers and contractors) must be treated with the same professional regard as those made against others. It is

recognised that abuse does take place in the context of schools, although fortunately this is infrequent.

It may be that allegations are falsely made. Staff should feel that they will be treated fairly and according to clearly set out procedures which will give them confidence that abuse and false allegations will be dealt with. Staff must protect themselves especially when meeting on a one-to-one basis with students and should bear in mind that even perfectly innocent actions can sometimes be misconstrued (please refer to the Staff Code of Safe Conduct).

Any sexual activity between a member of school staff and a pupil is likely to be a criminal offence, even if the pupil is over the age of consent. Furthermore, a sexual relationship with any pupil is likely to fall within the definition of abuse of trust, leading to the most serious disciplinary action.

Managing Allegations that meet the Harms Test

Managing accusations of abuse against staff members, including volunteers, supply staff, trainee teachers and contractors, is the sole responsibility of the Head and not the DSL.

If the allegation is against the Head, the matter must be taken directly to the Chair of Governors/Safeguarding Governor who will liaise with the local authority and/or partner agencies. **This must happen without informing the Head**. The Chair of Governors can be contacted via their College email address at:
chairofgovernors@stcolumbascollege.org.

If reporting an allegation to the Head could create a conflict of interest, the allegation must be made directly to the local authority designated officer (LADO).

If the allegation is levelled at the DSL, this must be reported to the Headmaster immediately as with any other staff member. In any case, the DBS and TRA will be informed as appropriate, most likely by the LADO.

As such there are a number of sensitive issues to manage:

1. the welfare and rights of the child
2. the rights of the member of staff involved
3. the reaction of the parents

All three require equal degrees of sensitivity.

For this reason, before any investigation is embarked upon, the matter will be referred to the LADO whose advice will be acted upon. Such allegations will be reported to the LADO immediately (and within one working day at the latest). The College will not undertake its own investigation of allegations without prior consultation with the Designated Officer and in the more serious cases consultation with the police (as determined by the Designated Officer). Employers of all supply staff and contractors will be notified of any concerns so that they can identify any patterns of behaviour. If an investigation of a member of staff results in dismissal (or would have done), the DBS is informed. If an allegation is substantiated and the individual has behaved in a way which has harmed or

is likely to harm a child, a referral to the DBS will be made. In the case of serious professional misconduct, the College will consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Any findings of professional misconduct are shared with the TRA.

Low Level concerns

Concerns that do not meet the harm threshold are referred to as 'low level concerns' however they remain significant. Example of low-level concerns include the use of inappropriate language, unprofessional behaviour, over familiarity or showing favouritism to pupils. These concerns must be reported to the same person outlined for those that do meet the harms test, to help maintain professional boundaries and minimise potential risk to children.

Reports of such concerns will be handled sensitively and proportionately with the primary aim to strengthen the College's safeguarding systems and support individuals to correct behaviour at an early stage. Following a report, the Head would collect as much evidence as possible, where possible, speaking with the person raising the concern, the individual involved and any witnesses. All concerns raised will be recorded, including the details of the concern, the context in which it arose, and any action taken. The name of the person reporting the concern will be noted, respecting their wish to remain anonymous as far as possible.

All records will be stored securely and remain confidential. Records will be reviewed by the Head and relevant CLT to identify any patterns of behaviour that need responding to, including potential internal disciplinary or referral to the LADO if the harms threshold is met. Records are also reviewed to help identify any wider cultural issues that could be addressed through policy or staff training to minimise reoccurrence. Low-level concerns which are shared about supply staff, trainee teachers and contractors should be notified to their employers or training provider, so that any potential patterns of inappropriate behaviour can be identified.

Section 10 Contractors, Volunteers, Out-of-Hours Providers and External Lettings

The College recognises that safeguarding must be given due regard in respect of everyone who works with our pupils or uses our site, outside as well as during the normal school day, whatever their employment status. This includes self-employed peripatetic teachers, outsourced catering and cleaning teams, coach drivers and regular volunteers who work directly with pupils, as well as external organisations, out-of-hours providers and hirers who use the College premises. In every case, responsibility for safeguarding rests with the College, not solely with the provider, employer or agency; a letter of assurance from a head office does not, on its own, discharge this duty.

People working regularly with our pupils. Peripatetic teachers, catering and cleaning staff, coach drivers and regular volunteers are all engaged in regulated activity with children. To ensure our arrangements are proportionate, auditable and robust, the College applies a three-tier framework, calibrated to the nature and frequency of each group's contact with pupils:

Group	Tier	Core requirements
Peripatetic teachers; regular parent volunteers	**Tier 1 — Full inclusion**	Enhanced DBS with barred-list check obtained and held by the College (plus a prohibition-from-teaching check for peripatetic teachers); safeguarding induction before starting; included in the annual September safeguarding update, with a signed sign-off returned to HR; SCR entry maintained.
Outsourced catering and cleaning staff	**Tier 2 — Briefing + assurance**	Enhanced DBS with barred-list check confirmed via an annual employer assurance letter; a school-specific safeguarding briefing delivered on-site by the DSL each September, with attendance recorded; summary card retained; SCR entry maintained.
Coach drivers	**Tier 3 — Written briefing + assurance**	Enhanced DBS with barred-list check confirmed via an annual employer assurance letter; a laminated conduct and reporting card issued to each named driver and signed annually; SCR entry maintained.

Following the removal of the "supervision exemption" from regulated activity by the Crime and Policing Act 2026 (effective 1 September 2026), any volunteer who teaches, trains, instructs or supervises children on more than 3 days in a month, or overnight, is in regulated activity regardless of whether they are supervised by a member of staff, and must have an enhanced DBS check with barred-list information in place before starting. Where the College is subject to the EYFS framework, volunteers must not begin working within the settings covered by the EYFS framework until the College has received the volunteer's enhanced DBS certificate, including barred list information.

Occasional volunteers who fall below this frequency or overnight threshold, and who are properly supervised at all times, fall outside these tiers; they do not automatically require a DBS check, but a risk assessment must be in place and they receive a briefing on arrival. Catering staff, cleaning staff and coach drivers are not required to complete the College's full online safeguarding training package, nor to attend safeguarding INSET days; the tier-specific briefing or conduct card is sufficient for their role.

The Tier 2 briefing and the Tier 3 conduct card cover, as a minimum, the identity and contact details of the DSL, what to do if a child makes a disclosure or appears distressed, conduct expectations, and the College's reporting obligations; the Tier 2 briefing also addresses lone working. Each individual completes a **Contractor Safeguarding Induction Record** before deployment, and each contracted organisation provides an **Annual Contractor Safeguarding Assurance Letter** confirming the checks, training and suitability of all personnel it deploys to the College.

The Head of HR obtains and records DBS checks for Tier 1 individuals before they start; requests and files the annual employer assurance letters for Tier 2 and Tier 3 providers; completes the induction record for each individual; issues and files signed conduct cards for coach drivers; maintains and reviews the Single Central Record (SCR) at the start of each term; and flags any gap in checks or concern about suitability to the DSL. Operational safeguarding for contractors and volunteers falls under the remit of the Deputy DSL, Mrs Kelly Freeman, who leads on its day-to-day delivery: she distributes the annual update materials to Tier 1 individuals and collects the sign-off sheets, delivers the on-site Tier 2 briefing, keeps the DSL contact details on the conduct card current, confirms completion so that the SCR can be updated, and acts as the named point of contact for any safeguarding concern raised by a contractor or volunteer. These duties are discharged under the overall direction of the DSL.

The College follows a fixed annual cycle so that these arrangements are in place at the start of each academic year, aligned with the September commencement of the updated Keeping Children Safe in Education guidance:

When	Action
First two weeks of September	HR chases and files the annual employer assurance letters for Tier 2 and Tier 3 providers and confirms the SCR is up to date. The Deputy DSL (operations) distributes the annual safeguarding update materials to Tier 1 individuals; signed sign-off sheets are returned within two weeks.
First two weeks of September	The Deputy DSL (operations) delivers the on-site Tier 2 briefing to catering and cleaning staff; attendance is recorded.
September	HR reissues the Tier 3 conduct cards to coach drivers; signed copies are returned and filed.
Throughout the year	For any contractor deployed mid-year, the Contractor Safeguarding Induction Record is completed and the SCR updated before their first day on site.
At any time	Any concern about a provider's suitability is reported to the DSL immediately and site access is suspended pending review.

Use of College premises by external hirers and providers.

Before any letting or provision begins, the College will carry out background checks on the provider and seek assurance that they have appropriate safeguarding and child protection policies and procedures in place, inspecting these where necessary. Providers must comply with the College's own safeguarding procedures, including its arrangements for signing in and for reporting safeguarding incidents.

The Lettings Manager will ensure that every external hiring organisation is aware of the College's conditions of hire and safeguarding procedures; these will be set out in the lease or hire agreement as a condition of the use and occupation of the premises, and failure to comply will lead to termination of the agreement. The College will provide hirers with copies of the relevant safeguarding policies, including the procedure for reporting

concerns about staff, health and safety information, the DSL's contact details, and the referral route for informing children's social care.

The Head of Estates will liaise with contractors working on site in relation to relevant safeguarding requirements, and the Lettings Manager will liaise with internal bookings, such as parent and staff groups, to ensure they understand their responsibilities and comply with the College's safeguarding procedures.

Reporting and allegations concerning external hirers and providers.
External hirers and providers must report any safeguarding concern by email to the DSL and the Lettings Manager at the earliest opportunity, and the DSL will follow the concern up as with any safeguarding allegation. In all cases, the College's safeguarding policies and procedures including, where appropriate, informing the Local Authority Designated Officer (LADO) apply in full to any allegation made against a contractor, volunteer, provider or hirer, or against any organisation or individual using College premises.

Appendix 1 Professional Guidance Contacts

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, the TES, MindEd and the NSPCC websites. Staff can access government guidance as required on the issues listed below via GOV.UK and other government websites:

- bullying including cyberbullying
- Child Abuse
- children missing education – and Annex B
- child missing from home or care
- child sexual exploitation (CSE) – and Annex B
- County lines toolkit for professionals
- domestic violence
- drugs
- Educate Against Hate
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) – and Annex B
- Forced marriage – and Annex B
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate
- Harmful online challenges and hoaxes
- mental health
- missing children and adults strategy
- private fostering
- preventing radicalisation – and Annex B
- relationship abuse
- SEND NSPCC links – Safeguarding children with special educational needs and disabilities (SEND) and NSPCC – Safeguarding child protection/deaf and disabled children and young people
- Sexual abuse support
- Sexual violence and sexual harassment between children in school and colleges
- sexting
- trafficking
- youth violence

Other relevant links

https://www.gov.uk/government/publications/keeping-children-safe-in-out-of-school-settings-code-of-practice/keeping-children-safe-during-community-activities-after-school-clubs-and-tuition-non-statutory-guidance-for-providers-running-out-of-school-settings

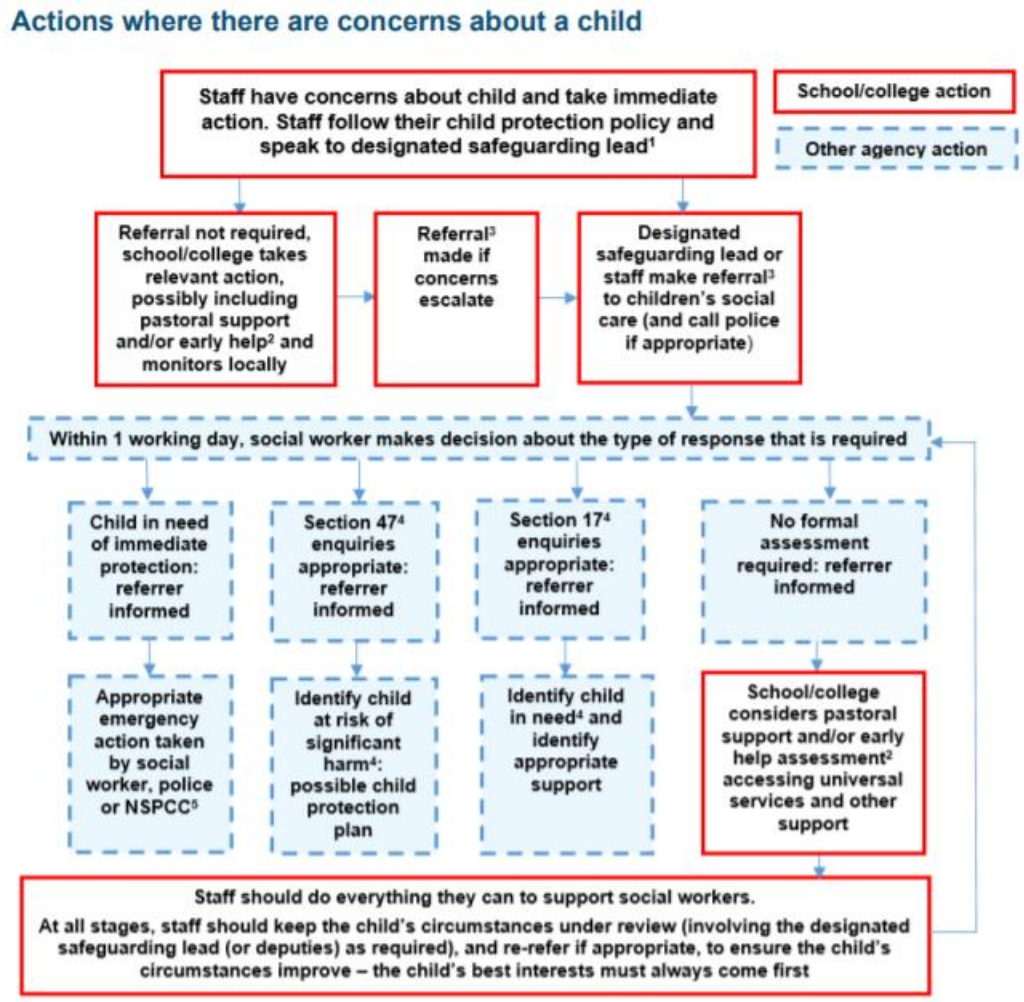
Appendix 2 – Safeguarding Contacts Register

Herts Local Authority Listing of National Contacts
To ensure most current contact information please check against this register by clicking through to tri.x National Contacts (proceduresonline.com). **Some of the most relevant are linked below (CTRL click)**

1. CAFCASS (Children and Family Court Advisory and Support Service)
2. CAMHS (Child and Adolescent Mental Health Services)
3. Channel and Prevent Multi-Agency Panel (PMAP) guidance
4. Children's Services
5. Child Missing in Education (Departures from school)
6. Children's Services Emergency Duty Team
7. County Lead Behaviour and Attendance
8. CRI (Crime Reduction Initiative)
9. Customer Service Centre/Targeted Advice Service (CSC/TAS)
10. Child Protection Conference Reports
11. Hertfordshire Domestic Violence/Abuse Line
12. Hertfordshire E-Safety Advisor
13. Hertfordshire Family Information Service
14. Hertfordshire Safeguarding Children Partnership (HSCP)
15. Independent & Private Schools
16. Joint Child Protection Investigation Team (JCPIT)
17. Designated Officer
18. NHS Trust Designated Doctor and Designated Nurse Safeguarding Children
19. NSPCC
20. Ofsted
21. Parent Partnership Hertfordshire
22. Police
23. Probation
24. Substance Misuse Teams/Community Drugs Team
25. Victim Identification Unit
26. Youth Connexions

Agency / Service	Contact Details
Police (Hertfordshire Constabulary)	Non-Emergency: 101 Emergency: 999
Hertfordshire Children's Services: Safeguarding and Specialist Services	Tel: 0300 123 4043 This includes

	Children's Services Out of Hours Service (SOOHS) Multi-Agency Safeguarding Hub (MASH) Hertfordshire Safeguarding Children Partnership (HSCP)
Local Authority Designated Officer (LADO)	Tel: 01992 556936 / 01992 555420
Children Missing Education (CME)	Tel: 01438 844793 / 01992 556867
Child and Adolescent Mental Health Services (CAMHS)	Access via NHS 111
CAFCASS (Children and Family Court Advisory and Support Service)	Bayley House, Sish Lane, Stevenage, SG1 3SSTel: 0300 456 4000
Adolescent Drug and Alcohol Service for Hertfordshire (A-DASH)	Tel: 01992 531917Email: A-Dash@hpft.nhs.uk
Hertfordshire Domestic Abuse Helpline	Tel: 0808 808 8088
Hertfordshire E-Safety Adviser	Tel: 01438 845111Email: info@hertsforlearning.co.uk
Hertfordshire Family Information Service (FIS)	Tel: 0300 123 4052Email: fis@hertfordshire.gov.uk
Child Online Safeguarding Team (COST) / Victim Identification Unit	Hertfordshire Constabulary Headquarters, Stanborough Road, Welwyn Garden City, HertfordshireEmail: VictimID@herts.pnn.police.uk
Prevent / Radicalisation Concerns	Police Emergency: 999 Police Non-Emergency: 101
Department for Education Counter-Extremism Division	Tel: 020 7340 7264Email: counter.extremism@education.gov.uk
NSPCC Helpline	Tel: 0808 800 5000Email: help@nspcc.org.uk
NSPCC Whistleblowing Advice Line	Weston House, 42 Curtain Road, London, EC2A 3NHTel: 0800 028 0285Email: help@nspcc.org.uk
NSPCC Report Abuse in Education Helpline	Tel: 0800 136 663Email: help@nspcc.org.uk
Childline	Tel: 0800 1111

Disclosure and Barring Service (DBS)	DBS Customer Services, PO Box 3961, Royal Wootton Bassett, SN4 4HFTel: 03000 200 190Email: customerservices@dbs.gov.uk
Teaching Regulation Agency (TRA)	Cheylesmore House, 5 Quinton Road, Coventry, CV1 2WTTel: 0207 593 5393Email: TRA.Caseworker@education.gov.uk
Ofsted	General Enquiries: 0300 123 1231Safeguarding/Compliance Concerns: 0300 123 4666Email: enquiries@ofsted.gov.uk
Independent Schools Inspectorate (ISI)	CAP House, 9–12 Long Lane, London, EC1A 9HATel: 0207 600 0100Email: info@isi.net
School Contacts	Designated Safeguarding Lead (DSL) Deputy Designated Safeguarding Lead Headteacher Safeguarding Governor

Safeguarding Flow Chart