

Safeguarding and Child Protection Policy and Procedures

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1. ROLE OF "CHAMPNEYS BEAUTY COLLEGE" AS PROPRIETOR.

As proprietor and governing body, CHAMPNEYS BEAUTY COLLEGE fully undertakes and recognises its statutory and regulatory duties

2. DEFINITIONS

Child/Young people include everyone under the age 16 & 17

Vulnerable adult refers to anyone over the age of 18 who is at greater risk of harm.

Safeguarding and promoting the welfare of young people refers to the process of protecting young people from maltreatment, preventing the impairment of health or development, ensuring that young people grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all young people to have the best outcomes. It can also include issues such as health and safety, use of reasonable force, meeting the needs of students with medical conditions, providing first aid, educational visits, intimate care and emotional well-being, online safety and associated issues and security – taking into account local context.

Child protection refers to the processes undertaken to protect young people who have been identified as suffering, or being at risk of suffering significant harm.

Staff refers to all those working for or on behalf of the College, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

Visitor refers to an adult present on the college site who is not a member of staff

Parent refers to birth parents and other adults who are in a parenting/carer role, for example step-parents, foster carers and adoptive parents.

Designated Officer – new term for LADO – a post in the local authority, to coordinate and manage allegations against staff.

DSL - Designated Safeguarding Lead.

3. INTRODUCTION

Champneys Beauty College fully recognises its moral and statutory responsibility to safeguard and promote the welfare of all young people and are wholly committed to providing a safe and

welcoming environment where young people are respected and valued. We are alert to the signs of abuse and neglect and have in place procedures to ensure that young people receive effective support, protection and justice as required. In all its dealings, Champneys Beauty College is committed to considering at all times what is in the best interest of the students of the college. The Senior Leadership of the college recognises the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis and will provide opportunities for staff to contribute to, and shape, safeguarding arrangements and child protection policy. Champneys Beauty College takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of young people and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those young people who are suffering harm. Where there are statutory requirements, the college must and will have in place policies and procedures that satisfy and comply with any guidance issued by the Secretary of State.

While this policy seeks to explain and accurately articulate the college's approach to safeguarding, it is essential that anyone who teaches, coaches or supervises Champneys Beauty College students understands that they are able to make a direct referral to external safeguarding authorities at any time should they feel concerned about the welfare of a pupil. See section 6.1 and Appendix B for procedures.

Safeguarding (as defined in the Joint Inspector's Safeguarding report) is taken to mean: "All agencies working with children, young people and their families take all reasonable measures to ensure that the risk of harm to children's welfare are minimised" and "where there are concerns about children and young people's welfare, all agencies take all appropriate actions to address those concerns, working to agreed local policies and procedures in full partnership with other agencies" Safeguarding encompasses issues such as student health and safety and bullying, about which there are specific statutory requirements and a range of other issues, e.g. arrangements for meeting the medical needs of children with medical conditions, providing first aid, school security and drug and alcohol misuse. Other safeguarding issues include child sexual exploitation and students who run away, go missing or fail to attend lessons as expected.

Safeguarding and Promoting the Welfare of Children is:

- Protecting children and young people from maltreatment;
- Preventing impairment of children and young people's health and development;
- Ensuring that children and young people are growing up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children and young people to have the best outcomes.

The college's 'Safeguarding and Child Protection Policy and Procedures' will be reviewed annually by Champneys Beauty College, unless an incident or new legislation or guidance suggests the need for an earlier date of review.

Record keeping: the college will maintain written records of concerns, discussions and decisions made, and the reasons for those decisions, about young people (noting the date, event and action taken), even when there is no need to refer the matter to children's services, the police or other agencies.

Key documents which inform this policy are:

- Keeping Children Safe in Education (KCSIE) (September 2019)
- Working Together to Safeguard Children (July 2018)
- The Prevent Duty (2015)

Copies of these documents can be found in the college safeguarding folder.

4. THE PRINCIPLES AND AIMS OF THIS POLICY:

Principles

The college is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment so as to create an open environment where staff and students feel able to raise concerns, and where concerns will be listened to with a readiness to involve support services and other agencies as necessary.

- The college will ensure that the welfare of young people is given paramount consideration when developing and delivering all college activities;
- Safe young people make more successful learners
- All young people, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection: to feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties;
- All staff, including the senior team, are responsible for safeguarding the welfare of young people as part of their professional duties;
- All staff have an equal responsibility to act, in accordance with this policy and procedures and KCSIE, on any suspicion, concern or disclosure that may suggest a child is in need of support services or is at risk of significant harm; the full version of KCSIE is available to all staff via the Safeguarding Folder.
- A young person's wishes or feelings will be taken into account when determining what action to take and what services to provide to protect them; young people will be given the opportunity to express their views and give feedback wherever possible.
- The college is committed to operating safer recruitment procedures in compliance with relevant legislation and guidance.
- All students and staff involved in child protection issues will receive appropriate support from the senior management of the school who will follow this policy guidance and statutory guidance in doing so.
- The college will work with other agencies wherever such work is needed to ensure adequate arrangements to identify, assess and support those children who are suffering significant harm or who may suffer significant harm without appropriate intervention. The college will work with the Hertfordshire Safeguarding Children Partnership, the police, health and other services to promote the welfare of young people and to protect them from harm.
- Where requested to do so, the college will allow access for children's social care from the Local Authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment. In addition, the college will comply with any request to supply information to the Local Safeguarding Children's Partnership that it requires in order for it to perform its functions.
- The college recognises the need to differentiate between safeguarding young people who have suffered or who are likely to suffer harm and those in need of additional support from one or more agencies. The former is recognised as needing to be referred to social services **immediately** and the latter should lead to inter-agency assessment using local processes, including use of the 'Common Assessment Framework' (CAF) and 'Team Around the Child' approaches.
- If a crime has been committed, the college will ensure that the police are contacted immediately (within 24 hours or one working day). This contact would be made prior to any discussion of the incident with parents and students.

While decisions to seek support for a child or young person in need would normally be taken in consultation with parents and students, their consent is not required to make a referral if there are reasonable grounds to believe that a child is at risk of significant harm.

Aims

As stated in the introduction, the college recognises its moral and statutory responsibility to safeguard and promote the welfare of all young people. We endeavour to provide a safe and welcoming environment where young people are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that young people receive effective support, protection and justice. As such, the college aims:

- To provide an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties.
- To raise the awareness of all staff of the need to safeguard young people and of their responsibilities in identifying and reporting possible cases of abuse.
- To ensure consistent good practice
- To provide a systematic means of monitoring young people, known or thought to be at risk of harm.
- To develop a structured procedure within the college which will be followed by all members of the college community in cases of suspected abuse.
- To ensure that key concepts of Child Protection are integrated within the curriculum.
- To develop effective working relationships with all other agencies, involved in safeguarding children.
- To ensure that all adults within our college who have access to young people have been checked as to their suitability.

5. KEY PERSONNEL

The School has both a Designated Safeguarding Lead and a Deputy Designated Safeguarding Lead.

Designated Safeguarding Lead (DSL): **SALOME WILLIAMS**

Role in school: Head of Operations

Contact details: Salome.williams@champneys.com 01442 291336/ 07592 819243

Deputy Designated Safeguarding Lead: **SUZANNE GALL**

Role in college: Head of Curriculum

Contact details: Suzanne.gall@champneys.com 01442 291339

References in this policy to the Designated Safeguarding Lead should be assumed to apply equally to the Deputy Designated Safeguarding Lead.

Head of Curriculum: Suzanne Gall

Head of Operations: Salome Williams

- The LADO (Local Authority Designated Officer) referral form can be found in the safeguarding file
- Details for The Hertfordshire Safeguarding Children Partnership can be found on the college website and in the safeguarding file.

Referrals for students living outside the borough will be made directly to the safeguarding team of the appropriate local authority.

Reports of concerns under the Prevent duty should be made to Hertfordshire Police.

6. CHILD PROTECTION PROCEDURES

The college's procedures for safeguarding young people are in line with Hertfordshire Local Authority.

- We have a designated senior member of staff (Designated Safeguarding Lead) for child protection, who is a member of the college's senior team, who has undertaken appropriate Designated Senior Person Safeguarding training.
- We have another member of staff who will act in the Designated Safeguarding Lead's absence (Deputy Designated Safeguarding Lead), who has also received the multiagency training.
- The DSL and DDSL will receive appropriate training
- All members of staff will receive appropriate training: (see relevant section in safeguarding folder) to develop their understanding of the signs and indicators of abuse; how to respond to a student who discloses abuse; about the procedure to be followed in sharing a concern of possible abuse or a disclosure of abuse
- Parents/carers are made aware of the college's responsibilities in regard to child protection procedures through publication of the college's 'Safeguarding and Child Protection Policy and Procedures' on the college website. Parents of students under the age of 18 are also sent the policy and asked to sign a parental declaration stating that they understand the college arrangements.
- All staff new to our college will be made aware of the college's policy and procedures, the name and contact details of the Designated Safeguarding Lead/Deputy Designated Safeguarding Lead as part of their induction into the school.
- All staff will provide written confirmation that they have read and understood the Part 1 and Annex A of Keeping Children Safe in Education (2019), the College's Safeguarding and Child Protection Policy, e-safety Policy, Staff Code of Conduct and Whistleblowing Policies.
- We will always communicate readily with the LA Safeguarding Children Partnership (and other safeguarding authorities where appropriate) whenever an allegation or disclosure is made.
- Our safeguarding procedures will be reviewed and updated annually.

6.1 WHAT TO DO IF YOU ARE CONCERNED ABOUT A CHILD:

There will be occasions when staff may suspect that a student may be at risk, but have no 'real' evidence. The student's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, **staff will give the student the opportunity to talk**. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill. It is fine for staff to ask the student if they are OK or if they can help in any way.

Staff should record these early concerns. If the student does begin to reveal that they are being harmed, staff should follow the disclosure advice below. Following an initial conversation with the student, if the member of staff remains concerned, they should discuss their concerns with the DSL.

All staff should be aware of indicators of abuse or neglect so that they are able to identify cases of young people who may be in need of help or protection. Indicators of abuse or neglect are described in Appendix A of this policy.

Where staff see in young people signs which cause them concern, they should speak to the DSL or Deputy. It is not their role to carry out an investigation. The member of staff should make a written note of the concern, recording the date, concern and action taken and pass it to the Designated Safeguarding Lead for filing. All child protection records will be filed securely and separately from the main pupil files.

If a member of staff is concerned that a pupil may be suffering significant harm or is at risk of significant harm, the matter should be referred to the DSL, or deputy in the DSL's absence, as soon as possible.

If there is a risk of immediate serious harm to a child or young person a referral should be made to Children's Social Care immediately, or in an emergency, dial 999 and request the appropriate emergency service. Anyone can make such a referral and the police must be contacted if there is reason to believe that a crime has been committed.

See Appendix B for a flow chart illustrating actions to be taken when there are concerns about a young person.

Reporting concerns in Hertfordshire:

Reports of concerns about a child should be made to the Hertfordshire Safeguarding Children Partnership on 0300 123 4043

Reports of concerns under the Prevent duty should be made to the PREVENT team at prevent@herts.pnn.Police.uk, using the appropriate referral form.

6.2 WHAT TO DO IF A YOUNG PERSON DISCLOSES INFORMATION TO YOU

It takes a lot of courage for a young person to disclose that they are being neglected and / or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a young person talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets or promise confidentiality. The point at which you do this is a matter for professional judgement. If you jump in immediately the young person may think that you do not want to listen; if you leave it till the very end of the conversation, the young person may feel that you have misled them into revealing more than they would have otherwise.

If a young person volunteers information about abuse to a member of staff, it may sometimes be done obliquely rather than directly. An abused young person is likely to be under severe emotional stress and the staff member may be the only adult whom the young person is prepared to trust. When information is offered in confidence, the member of staff will need to explain with sensitivity, whilst retaining the young person's trust, that action may be required, that other adults will need to be informed and that complete confidentiality cannot be honoured. Staff need to be aware that the most important aspect of their response to a young person is willingness to listen and to take seriously what the young person is saying, without asking questions or making any assumptions (e.g. about who has abused the young person) which could later be interpreted as leading the young person if criminal proceedings were to follow. The young person should tell the full story of what has happened only once. The member of staff should as soon as possible (certainly within 24 hours) make a written note of the discussion, recording date, place and names of any else present, and

using the words of the young person where they are remembered. In any criminal proceedings these notes would be potentially disclosable to both the prosecution and defence lawyers.

During your conversation with the young person:

- Allow them to speak freely.
- Remain calm and do not over-react – the young person may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
- Do not be afraid of silences – remember how hard this must be for the young person.
- Under no circumstances ask investigative or leading questions – such as how many times this has happened, whether it happens to siblings too, or what the young person’s mother thinks about all this.
- At an appropriate time tell the young person that in order to help them you must pass the information on.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a young person who has been abused.
- Avoid admonishing the young person for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be your way of being supportive but the young person may interpret it that they have done something wrong.
- Tell the young person what will happen next. The young person may agree to go with you to see the DSL. Otherwise let them know that someone will come to see them before the end of the day.
- Seek support if you feel distressed.
- Consider whether the action required of you constitutes ‘Whistleblowing’ (see Whistleblowing Policy for further information)

Notifying parents

The College will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively and the DSL will be in the most informed position to make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the college believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from an external agency.

6.3 CONFIDENTIALITY

Staff will only discuss concerns with the Designated Safeguarding Lead. That person will then decide who else needs to have the information and they will disseminate it on a ‘need-to-know’ basis.

We will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively and the DSL will be in the most informed position to make contact with the parent in the event of a concern, suspicion or disclosure.

However, if we believe that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from an external agency

The Seven Golden Rules for Safeguarding Information Sharing 2015

- Data Protection/Human rights laws are not a barrier.
- Be open and honest. (unless unsafe or inappropriate)
- Seek advice. (anonymise if necessary)
- Share with consent if appropriate.
- Consider safety and wellbeing.

- Necessary, proportionate, relevant, adequate, accurate, timely and secure.
- Keep a record of decision and reason for it.

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Whilst the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children. (See Data Protection Policy for further details)

6.4 EARLY HELP

Early help means providing support as soon as a problem emerges, at any point in a young person's life, from the foundation years through early adulthood. Early help can prevent further problems arising and/or escalating in the future.

Staff at the college are aware of the importance of being alert to the potential need for early help for a young person who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education Health and Care Plan);
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing / goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the young person, such as substance abuse, adult mental health problems and domestic violence;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered young person.

In addition, the context of the college means that our students are often experiencing life away from home for the first time as well as an intense workload an entirely new social situation as well as a range of other personal factors that can make them vulnerable. As such staff are aware of the benefits of early help to a student who may be experiencing difficulty, and understand their role in identifying emerging problems, liaising with members of the pastoral team and sharing concerns with the Designated Safeguarding Lead.

If the concern is low level and does not require other agency involvement the DSL will initiate early intervention to;

- Engage with the parents/carers as soon as possible (unless the situation is so serious that would put the student at increased risk.) We then can evidence quick action was taken and the length of time of involvement.
- We will invite the parents/carers into college for a meeting to demonstrate professional concerns and discuss a supportive working partnership for the best interests of the student (e.g. signposting to external agencies, additional in college support)
- At this meeting we will discuss the plan of next action should the situation not improve.
- We will record all contacts with the family, dates and times, including phone calls/letters.
- We will then monitor the student closely - behaviour/concerns/interaction with peers and

parents/academic progress etc. This will demonstrate the frequency of concerns and help to build patterns.

See the college Mental Health Policy for further information on supporting young adults experiencing difficulties.

7. WHAT STAFF SHOULD LOOK OUT FOR

7.1 SAFEGUARDING ISSUES AND CONTEXTUAL SAFEGUARDING

All staff should have an awareness of safeguarding issues that can put a young person at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as Youth Produced sexual Imagery) put young people in danger.

Assessments of young people should consider whether the wider environmental factors present in the young person's life could be a threat to their safety or welfare (contextual safeguarding). When referring to children's social care, the college will provide as much information as possible in order to allow all the available evidence and the full context of any abuse to be considered.

7.2 ABUSE AND NEGLECT

See appendix A for detailed information on specific forms of abuse and indicators of abuse.

7.3 PEER ON PEER ABUSE

See Section 8 on response to allegations of abuse

7.4 SERIOUS VIOLENCE

All staff should be aware of indicators that may signal that young people are at risk from or involved in serious violent crime. These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could indicate that young people have been approached by, or are involved with individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these.

7.5 FEMALE GENITAL MUTILATION AND OTHER FORMS OF 'HONOUR-BASED VIOLENCE'

All staff should speak to the DSL or Deputy with regard to concerns about FGM. For teachers, there is a specific duty to report this concern to the police.

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

There are a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person.

Victims of FGM are likely to come from a community that is known to practise FGM – see Section 2.5 of the document hyperlinked below for the nationalities that traditionally practise FGM. Provided that the mutilation takes place in the UK, the nationality or residence status of the victim is irrelevant.

Further detailed guidance can be found here:

www.gov.uk/government/uploads/system/uploads/attachment_data/file/380125/MultiAgencyPracticeGuidelinesNov14.pdf

Mandatory Reporting: All staff should speak to the Designated Safeguarding Lead (or deputy) with regard to any concerns about female genital mutilation, there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, becomes aware of, or has reason to suspect that, female genital mutilation has been carried out on a girl under that age of 18, they must report their concern immediately to the police and, thereafter and unless there is a good reason not to do so, to the Designated Safeguarding Lead. If the DSL is unavailable, or if the person reporting their suspicion feels unable to approach the DSL, the report will be made to the Deputy Designated Safeguarding Lead and, if they are unavailable, the most senior member of staff will be alerted.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and teachers should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

7.6 SEXTING / YOUTH PRODUCED SEXUAL IMAGERY

In the latest advice for schools and colleges (UKCCIS, 2016), sexting is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as ‘youth produced sexual imagery’. ‘Sexting’ does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.

When an incident involving youth produced sexual imagery comes to the attention of a member of staff:

- The incident should be referred to the DSL as soon as possible
- The DSL will hold an initial review meeting with appropriate college staff to establish whether there is an immediate risk to the young person or young people, whether a referral should be made to the police and / or children’s social care. The YPSI Risk Assessment Form should be used to help this decision-making process. An immediate referral to police and / or children’s social care will be made if:
 1. The incident involves an adult
 2. There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent
 3. What is known about the imagery suggests the content depicts sexual acts which are unusual for the young person’s developmental stage, or are violent
 4. The imagery involves sexual acts and any student in the imagery is under 13
 5. A pupil is at risk of harm owing to the sharing of the imagery (eg the student is suicidal or self-harming)

- If police / children’s social care are not involved, there will be subsequent interviews with the young people involved (if appropriate), and the DSL / DDSL will complete a risk assessment in relation to the incident.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children’s social care and/or the police immediately.
- Decisions will be based on consideration of the best interests of the young people involved, and take into account proportionality as well as the welfare and protection of young people. The decisions and reasons for them will be recorded, and reviewed throughout the process. The college will follow the procedures laid out in ‘Sexting in schools and colleges: Responding to incidents and safeguarding young people’.

7.7 OTHER SAFEGUARDING CONCERNS

As outlined in Annex A of KCSIE (2019): Children and the court system, children missing from education, children with family members in prison, child sexual exploitation, child criminal exploitation (county lines), domestic abuse, homelessness, preventing radicalisation (see also section 21 of this policy), sexual violence and sexual harassment between children, ‘upskirting’.

8. RESPONSE TO ALLEGATIONS

8.1 ABUSE OF POSITION OF TRUST

All College staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the college staff and a student under 18 may be a criminal offence, even if that student is over the age of consent.

8.2 ALLEGATIONS AGAINST STAFF AND VOLUNTEERS WORKING AT THE SCHOOL:

When an allegation is made against a member of staff, set procedures must be followed. It is important to have a culture of openness and transparency and a consultation with the Designated Officer will happen if staff have;

- Behaved in a way which has harmed, or may have harmed a child or young person;
- Possibly committed a criminal offence against or related to a child or young person or
- Behaved towards a child or young person in a way that indicates they would pose a risk of harm to young people.

Allegations against staff should be reported to the DSL. Allegations against the DSL should be reported to the DDSL. The DSL or DDSL will then consult the LADO without notifying the staff member about whom the allegations relates. If the DSL or DDSL believes that a crime has been committed, the police will be contacted immediately. No investigation will be undertaken by any member of the college without prior consultation with the LADO or police. This is to ensure that statutory investigations are not jeopardised. In borderline cases, informal discussions will be held with the LADO, with neither the name of the college nor the individual concerned being mentioned.

If any investigations are to be carried out subsequent to that discussion, they will be conducted on the basis of the advice received by the LADO/ police.

Staff may also report their concerns directly to Police or Designated Officer or NSPCC Whistle blowing helpline if they believe direct reporting is necessary to secure action

It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen. We recognise that a child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. However if a child is found to continually make false allegations this may be a sign of mental health issues and a referral to services such as CAMHs (Child and Adolescent Mental Health) may be required.

An uncomfortable fact is that some professionals do pose a serious risk to students and we must act on every allegation. However staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that young people are protected.

All aspects of the response to an allegation against a member of staff, including reporting, investigating, decision-making, confidentiality, record-keeping and support for those involved will be undertaken in line with the guidance published in Keeping Children Safe in Education 2019.

Staff and parents are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites. We will communicate this to all parties.

Colleagues should take steps to minimise the impact of an unfounded allegation through following this advice:

- All college staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual young people or parents to be conducted in view of other adults.
- All staff should be aware of the Staff Code of Conduct.

The Head of Operations will report to the Disclosure and Barring Service (DBS) any person whose services are no longer used because he or she is considered unsuitable to work with children or young people as soon as possible.

The duty to refer to the DBS relates to anyone who has harmed or poses a risk of harm to a child, young person or vulnerable adult where:

- The harm test is satisfied in respect of that individual. Guidance is available here: <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>
- The individual has received a caution or conviction for a relevant offence, or there is a reason to believe that the individual has committed a listed relevant offence
- The individual has been removed from working (paid or unpaid) in a regulated activity, or would have been removed had they not left.

(See 'Whistleblowing policy' for further information about raising concerns relating to school staff).

8.3 ALLEGATIONS MADE AGAINST FELLOW PUPILS (PEER ON PEER ABUSE):

The college recognises that young people are capable of abusing their peers and that peer on peer abuse can manifest itself in many ways most likely to include, but not limited to:

- Bullying (including cyberbullying)
- Physical abuse (such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm)
- Sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment (such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse)
- 'Upskirting' which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or to cause the victim humiliation, distress or alarm
- Sexting (also known as Youth Produced Sexual Imagery)
- Initiation and hazing type violence and rituals.

Procedures for recording, investigating and dealing with peer on peer abuse can be found in the Anti-bullying Policy.

Staff will not tolerate any form of abuse at the college and will not pass it off as 'banter', 'just having a laugh' or 'part of growing up'. Whilst the college recognises the gendered nature of peer on peer abuse (ie that it is more likely that girls will be victims and boys perpetrators) as well as the particular nature of peer on peer abuse within a predominantly female environment, it is predominantly recognised that all peer on peer abuse is unacceptable and will be taken seriously.

Any allegations of abuse made by one or more students against another student must be reported to the Designated Safeguarding Lead, who will take necessary measures to safeguard the student and will refer the matter immediately to the Head of Curriculum or most senior teacher present.

It is the college's assumption that, in the event of serious allegations being made of student on student abuse, all young people involved (whether perpetrator or victim) are at risk and the Head of Operations will refer the matter to the Safeguarding Children's Board in the borough(s) where the pupil(s) are resident immediately or, at the latest, within 24 hours.

8.2.1 Procedures to minimise the risk of peer on peer abuse

Creating an appropriate culture within the college:

- The college uses a variety of methods e.g. wellbeing lessons, visual information displays to foster a culture in which all members of its community treat one another with courtesy, kindness and respect.
- All staff receive safeguarding training and are required to confirm that they have read, understand and are able to implement the School's Safeguarding and Child Protection Policy.
- All staff are also required to confirm that they have read and understood Part One and Annex A of the most recent version of Keeping Children Safe in Education

Examples of practical steps taken to minimise the risk of peer on peer abuse:

- Students are supervised by members of staff during teaching sessions
- Unless involved in formal after-school activities, students are not allowed to stay on the college site once the college day has ended.
- Teaching salons have windows in doors to ensure that anyone passing a room can see into it

- Students are encouraged to share any concerns they have about their safety and wellbeing with friends, their tutors, a trusted member of staff or the Designated/ Deputy Designated Safeguarding Lead. Posters emphasising this are located in all student common rooms.
- Any and all forms of bullying are dealt with swiftly and firmly by staff and students are encouraged to share information about bullying with a member of staff.
- No form of initiation is tolerated
- Staff recognise the vulnerability of pupils with SEND and have undergone training in this area.

8.2.2 How victims of peer on peer abuse will be supported

- Members of the college's pastoral team (Tutors, Head of Operations and Head of Curriculum) are always available to meet with pupils to discuss any challenges or difficulties pupils may be experiencing
- The college's pastoral team share concerns about students as required. This ensures that staff are aware of students who have experienced, or are experiencing, difficulties and able to support them appropriately.
- A Mental Health First Aider is available to see students who are experiencing difficulties
- Details for local Counsellors and support lines are available on noticeboards and in the Mental Health resources area
- The college will cooperate fully with external agencies e.g. children's services, the police and CAMHS in ensuring that any student who has suffered peer on peer abuse receives the support they need.

9. TRAINING

- All staff are required to read Part One of KCSIE, together with Annex A, at the start of every academic year and at any other time that there is a re-issue. Staff are required to sign a document stating that they have read and understood both Part One and Annex A of KCSIE and the School's Safeguarding and Child Protection Policy. The DSL is responsible for ensuring this happens, and the document is kept by the Head of Operations.
- All staff, including temporary staff and volunteers, will be provided with induction training that includes:
 - A full examination of the college's Safeguarding and Child Protection Policy
 - Full consideration of the college's Staff Code of Conduct which will also include the whistleblowing procedure
 - Identifying and explaining the roles of both the Designated and Deputy Designated Safeguarding Leads
 - Being provided with a copy of
 - This policy
 - The Staff Code of Conduct
 - A copy of KCSIE Part 1 and Annex A
 - The Whistleblowing Policy
 - The ICT Acceptable Use Policy
- All staff are required to undertake appropriate safeguarding and child protection training, at a frequency and covering content as required by the local authority, on appointment and annually.
- All staff will receive online-safety and Prevent Duty training on an annual basis
- Two yearly training for the Designated and Deputy Designated Safeguarding Leads will be supplemented with at least annual informal updates (e.g. by email and staff meeting) as required.

- The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads will attend appropriate training provided by the Hertfordshire Safeguarding Children Partnership or equivalent in order to keep up to date with current knowledge in fulfilling their role. This includes training related to the governments' Prevent strategy.
- The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead must attend the training provided specifically for Designated Safeguarding Leads (designated persons), which includes training on inter-agency working, at least once every two years, with at least annual updates.
- The Designated Safeguarding Lead must ensure that all staff, receive regular safeguarding training and that this is clearly recorded.

9.1 Good Practice Guidelines and Staff Code of Conduct

To meet and maintain our responsibilities towards students we need to agree standards of good practice which form a code of conduct for all staff. Good practice includes:

- Treating all students with respect
- Being alert to changes in students' behaviour and to signs of abuse and neglect
- Recognising that challenging behaviour may be an indicator of abuse
- Setting a good example by conducting ourselves appropriately, including online.
- Involving students in decisions that affect them
- Encouraging positive, respectful and safe behaviour among students including challenging inappropriate or discriminatory language or behaviour.
- Avoiding behaviour or language which could be seen as favouring students.
- Avoiding any behaviour which could lead to suspicions of anything other than a professional relationship with students.
- Reading and understanding the college's child protection policy and guidance documents on wider safeguarding issues, for example bullying, behaviour, and appropriate IT/social media use.
- Asking the student's permission before initiating physical contact, such as administering first aid (also refer to section 8 of this document)
- Maintaining appropriate standards of conversation and interaction with and between students. Avoiding the use of sexualised or derogatory language, even in joke.
- Being clear on professional boundaries and conduct with other staff when students present.
- Being aware that the personal, family circumstances and lifestyles of some students lead to an increased risk of abuse
- Applying the use of reasonable force only as a last resort and in compliance with College procedures
- Dealing with student infatuations in an open and transparent way e.g. informing the correct managers and managing the situation in a way which is sensitive to the feelings of the student.
- Referring all concerns about a student's safety and welfare to the DSL, or, if necessary directly to police or young people's social care
- Following the college's rules with regard to communication with students and use of social media and online networking
- Avoiding unnecessary time alone with students and risk manage any time alone or 1:1 working.
- Avoiding sharing excessive personal information with students.

10. ROLES AND RESPONSIBILITIES IN MANAGING SAFEGUARDING AND CHILD PROTECTION:

10.1 ALL STAFF:

All staff, which includes the senior team, teaching and support staff, including temporary staff and all volunteers, have a statutory responsibility to:

- Provide a safe environment in which young people can learn;
- Be prepared to identify young people who may benefit from early help, know the factors that increase vulnerability as set out in Part 1 of Keeping Children Safe in Education, and be aware of the local process for early help and their role in it;
- Be aware of systems, policies and procedures within the college which support safeguarding:
 - The Safeguarding and Child Protection Policy
 - The Staff Code of Conduct
 - The Safeguarding Response to Children who go missing from education
 - The role and identity of the Safeguarding Lead and deputy;
- Be aware of the referral processes in relation to child welfare concerns, as set out in Part 1 of Keeping Children Safe in Education, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm), along with the role they might be expected to play in such assessments;
- Be aware that safeguarding issues can manifest themselves via peer on peer abuse, which is more likely to include, but may not be limited to: bullying, physical abuse, sexual violence, sexual harassment, sexting / youth produced sexual imagery, initiation / hazing rituals.
- Know what to do if a young person tells them he/she is being abused or neglected and know how to manage the requirement to manage an appropriate level of confidentiality;
- Be aware of the signs of abuse and neglect so that they are able to identify young people who may be in need of help or protection
- Work with the DSL and, if required, to support social workers to take decisions about individual children.
- Be aware that concerns relating to female genital mutilation should be reported to the Designated Safeguarding Lead (or Deputy), and that there is a specific legal duty on tutors to inform the police about any concerns about female genital mutilation.
- Refer safeguarding concerns or allegations made about other members of staff, including volunteers, to the Head of Operations or Head of Curriculum, and concerns/allegations about the Head of Operations or Head of Curriculum to whichever the allegation does not concern.
- Raise concerns about poor or unsafe practice, and potential failures in the college's safeguarding regime with the senior team, and if concerns persist, through other whistleblowing channels eg. Champneys Spa Director
- Make a direct referral to the relevant Safeguarding Children Board or the police immediately if, at any point, there is a risk of immediate serious harm to a young person.

10.2 THE SENIOR TEAM:

- Ensure that the safeguarding and child protection policy and procedures adopted by the college are implemented and followed by all staff;
- Allocate sufficient time and resources to enable the DSL and deputy to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings;
- Ensure that an environment exists with the college in which all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively. Reporting wrongdoing by staff in the workplace that does not involve the safeguarding and welfare of young people is dealt with in accordance with the whistle blowing procedures;
- Ensure that young people's safety and welfare is addressed through the curriculum.
 - Creates a culture where the welfare of students is paramount and staff feel confident to

- challenge over any concerns.
- Has an effective safeguarding policy (updated annually and on website) as well as staff behaviour policy and both are provided to and followed by all staff in a timely manner.
 - Has an appropriate response to young people who go missing from education and inform and report to the Local Authority when required.
 - Appoints a DSL trained every 2 years, and that the responsibilities are explicit in the role holder's job description. The DSL should be given time, funding and training to support this. There should always be cover for this role.
 - Has evidence of the learner voice and that there are systems in place for feedback and students views.
 - Procedures are in place for referral to the DBS disclosure and barring service.
 - Has safer recruitment procedures that include statutory checks on staff suitability to work with young people and ensures recording of this. Ensures volunteers are appropriately supervised.
 - Ensure appropriate **online filter and monitoring systems** are in place and ensure online safety is included in lessons.
 - Ensures that the child protection policy and code of conduct are implemented and followed by all staff
 - Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures
 - Ensures that students are provided with opportunities to learn about safeguarding, including keeping themselves safe online
 - Liaises with the Designated Officer where an allegation is made against a member of staff
 - Ensures that anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service.

10.3 DESIGNATED SAFEGUARDING LEAD:

The broad areas of responsibility for the college's Designated Safeguarding Lead, as per Appendix B of Keeping Children Safe in Education 2019, are described below. The Champneys Beauty College Designated Safeguarding Lead Job Description appears in Appendix C of this policy, providing further details about the way in which these responsibilities are met at Champneys Beauty College.

The Designated Safeguarding Lead is a member of the Senior Team and takes lead responsibility for child protection. The Designated Safeguarding Lead has the status and authority within the college to carry out the duties of the post and is authorised to commit resources and support and direct staff as appropriate.

This person should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings – and / or to support other staff to do so – and so to contribute towards the assessment of children.

Manage referrals

- The Designated Safeguarding Lead is expected to:
- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;

- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service, as required;
- Refer cases where a crime may have been committed to the Police as required Work with Others
- Liaise with the senior team to inform them of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the “case manager” and the (local authority) designated officer(s) for child protection concerns (all cases which concern a staff member);
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- Act as a source of support, advice and expertise for staff
- Take the lead in early help, liaising with other agencies and setting up an inter-agency assessment as appropriate.
- Ensure that when children leave the college, that their child protection file is transferred to the new school or college as soon as possible, ensuring secure transit and securing confirmation of receipt.
- Consider whether it is appropriate to share any information with a new school or college in advance of a child leaving.

Training

The Designated Safeguarding Lead and Deputies will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The Designated Safeguarding Lead will undertake Prevent awareness training.

In addition, the Designated Safeguarding Lead and Deputies will, at regular intervals, as required but at least annually, refresh their knowledge and skills (eg via e-bulletins, meeting other safeguarding leads or by taking time to read and digest safeguarding developments) so as to keep up with any developments relevant to their role in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to and understands the college’s child protection policy and procedures, especially new and part time staff;
- Be alert to the specific needs of children in need, those with special educational needs and young carers;
- Be able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support the college with regards to the requirements of the Prevent duty and are able to provide advice and support staff on protecting children from the risk of radicalisation;
- Obtain access to resources and attend any relevant or refresher training courses;
- Encourage a culture of listening to young people and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them.

Raising Awareness

The Designated Safeguarding Lead shall

- Ensure that the college’s child protection policies are known, understood and used appropriately

- Ensure the college's Safeguarding and Child Protection is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with Governors regarding this
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the college in this
- Link with the Hertfordshire Safeguarding Children Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

Child Protection File

Where children leave the school ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt should be obtained.

Consider whether it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have support in place for when the child arrives.

Availability

The Designated Safeguarding Lead or Deputy is available to discuss matters of concern with students, staff and parents throughout the school day. In the event of an emergency or out of hours enquiry, the DSL can be reached by phoning the mobile number provided in section 5 of this document.

10.4 DEPUTY DESIGNATED SAFEGUARDING LEAD:

The DDSL has been trained to the same level as the Designated Safeguarding Lead. In the absence of the DSL, the functions of the DSL will be carried out by the DDSL. However, the ultimate lead responsibility for child protection remains with the Designated Safeguarding Lead and this responsibility will not be delegated. In this policy, reference to the DSL includes the deputy DSL where the DSL is unavailable.

11. SUPPORTING STAFF

- The college recognises that staff working in the college who have become involved with a young person who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- The college will support such staff by providing an opportunity to talk through their anxieties with the Designated Safeguarding Lead and to seek further support, if required.

12. ONLINE SAFETY

The use of technology has become a significant component of many safeguarding issues e.g. child sexual exploitation, radicalisation and sexual predation. Technology often provides the platform that facilitates harm and the college is aware that there are three areas of risk associated with online safety:

- content: being exposed to illegal, inappropriate or harmful material
- contact: being subjected to harmful online interaction with other users
- conduct: personal online behaviour that increases the likelihood of, or causes, harm

The college acknowledges that our students will use mobile devices and computers and recognises that they are important tools for communication and education as well as for recreation and socialising. However, we know that some men, women and young people will use these technologies

to harm young people. The harm might range from sending hurtful or abusive texts and emails (cyber-bullying), to enticing young people to engage in harmful conversations, webcam photography or face-to-face meetings.

- The college seeks to protect and educate the whole college community in their use of technology
- The college's Code of Conduct and ICT Acceptable Use Policy explains the responsibilities of staff in relation to keeping young people safe while online (whether in college or not) and educates both staff and students in online-safety.
- Students receive guidance on the safe use of the web (including anti-bullying) through induction and in-college displays. The college is committed to ensuring that its pupils are aware of the dangers associated with the use of online technology so that they are equipped with the necessary skills to stay safe at all times, whether at college or not.
- Cyber-bullying by young people, via texts, direct messages, social media or email, will be treated as seriously as any other type of bullying and will be managed through our AntiBullying Policy and procedures. See 'e- Safety Policy' and Acceptable use policies

13. SAFER RECRUITMENT

Champneys Beauty College endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in Keeping Children Safe in Education (2019) together with HSCP and the college's individual procedures.

Recruitment, selection and pre-employment vetting is carried out in accordance with Keeping Young people Safe in Education 2019. Including;

Verifying identity:

- Enhanced DBS (disclosure and barring service) check for those in regulated activity
- Right to work in UK
- Professional qualifications.
- References will be sought before interview so any concerns can be explored.

14. SECURE PREMISES

- College premises: The college will take all practicable steps to ensure that college premises are as secure as circumstances permit.
- Visitors' book and identification badges: Visitors to the college are asked to sign in including contractors and parents. They must show ID (where necessary), and are given a badge, which confirms they have permission to be on site. All visitors are expected to enter through one entrance and observe the college's safeguarding and health and safety regulations to ensure young people in college are kept safe. The senior team will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.
- Staff photographs: photographs of all teaching and operations staff are publicly displayed near the college's reception area.

15. ANTI-BULLYING

Our policy on the prevention and management of bullying is set out in our Anti-Bullying Policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. Staff are aware that bullying can take place online and that social media can be used to

perpetrate acts of cyberbullying. Bullying will be treated as a safeguarding issue should there be reasonable cause to believe a young person is at risk or likely to suffer significant harm as a result.

The college community will therefore:

- Establish and maintain an ethos, which is understood by all staff, which enables young people to feel secure and encourages them to talk knowing that they will be listened to.
- Ensure that all young people know there is an adult in the school whom they can approach if they are worried or in difficulty.
- Record incidents of bullying that are reported to any member of staff, or that are witnessed by any member of staff
- Provide across the curriculum, opportunities which equip children with the skills they need to stay safe from harm, including when accessing the internet, and to know to whom they should turn for help. (See 'Anti-Bullying Policy' and 'e-Safety Policy' for further details)

16. PHYSICAL INTERVENTION/POSITIVE HANDLING AND 'REASONABLE FORCE'

- 'Reasonable force' refers to a broad range of actions used by staff that involve a degree of physical contact to control or restrain young people, and 'reasonable' means 'using no more force than is needed'. The decision on whether to use reasonable force to control or restrain a young person is down to the professional judgement of the staff concerned and should always depend on individual circumstances.
- In incidents involving young people with SEN or disabilities or with medical conditions, the risks should be considered carefully, recognising the additional vulnerability of these groups. Duties under the Equalities Act (2010) in relation to making reasonable adjustments, non-discrimination and equality duties should be considered, and where possible planned positive and proactive behaviour support should be in place to reduce the likelihood of an incident.
- The college's guidance is that that staff must only ever use physical intervention as a last resort, e.g. when young person is endangering him/her or others and that, at all times it must be the minimal force necessary to prevent injury to another person.
- Such events should be recorded in writing by the member of staff who intervened and counter-signed by a witness. Incidents involving the use of restraint should be reported to Suzanne Gall, Head of Curriculum or, in her absence, Salome Williams, Head of Operations. Suzanne Gall/Salome Williams will inform the parents of the student(s) who needed to be physically restrained and may refer such incidents to the Designated Safeguarding Lead.
- We understand that physical intervention of a nature which causes injury or distress to a young person may be considered under child protection or disciplinary procedures. (See 'Staff Code of Conduct' for further details)

17. PHOTOGRAPHY AND IMAGES

The vast majority of people who take or view photographs or videos of young people do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse young people through taking or using images. To protect our students, we seek parental consent to take photographs of their young people. We will take seriously concerns raised by any parents, student or member of staff if they are worried about any photograph that has been taken of any member of the college community.

If the behaviour of an adult capturing images seems unusual or the student appears to be worried by someone taking photographs of them, staff will act to challenge the adult (where they feel safe and

confident to do so) and report the matter to the DSL as soon as possible, and in as much detail as possible, to allow the concern to be followed up. The police will be informed in cases of serious concern.

From time to time professional photographers are invited into the college to take group photographs or pictures of significant events; any professional photographers hired by the college will be subject to appropriate vetting checks.

To protect students we will:

- Seek their consent for photographs to be taken or published, for example, on our website, on social media or in newspapers or publications
- Seek parental consent for under 18s
- Not use students full name with an image
- Ensure students are appropriately covered
- Ensure that personal data is not shared.
- Store images appropriately, securely and for no longer than necessary.
- Only use College equipment, i.e. not personal devices.
- Encourage students to tell us if they are worried about any photographs that are taken of them.

Expectations of students: students are not allowed to take photographs or video footage (on the college site or off-site during school trips) of other members of the college community (including staff and parents) without the express permission of the individual(s) concerned.

Expectations of staff are made clear in The Staff Code of Conduct

18. HEALTH & SAFETY

Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of our young people both physically within the school environment and, for example, in relation to internet use, and when away from the college when undertaking school trips and visits. (See Health and Safety Policy for further details)

19. LOOKED AFTER CHILDREN

The college is aware of its moral and statutory obligation to support Looked After Children, and that previously looked after children potentially remain vulnerable. As for all our students, the college is committed to helping every Looked After Child (LAC) to achieve the highest standards they can, including supporting aspirations to achieve in further and higher education. The Designated Safeguarding Lead has specific responsibility for overseeing the welfare and progress of any Looked After Child attending the college. Prompt action and effective liaison with other agencies is essential to safeguard these young people, who are a particularly vulnerable group.

20. PASTORAL AND SAFEGUARDING EDUCATION

Safeguarding procedures are covered in the college induction including awareness of who the DSL is and the presence of Mental Health First Aiders. The Anti Bullying Policy is distributed to students to sign an advance of enrolment and again on induction. Reminders

of the college culture are displayed on noticeboards along with Key Safeguarding and Mental Health contacts.

21. ANTI-RADICALISATION AND PREVENTING PUPILS FROM BEING DRAWN TO TERRORISM

The college is committed to safeguarding its pupils from radicalisation/ extremism and preventing them from being drawn to terrorism. Staff will use their judgement in identifying young people who might be at risk of radicalisation and pass concerns to the Designated Safeguarding Lead or Deputy.

The college is equally committed to working with relevant sectors and institutions if it is discovered that a member of the college's community is in danger of becoming/ has become radicalised or has been/ is in danger of being drawn to terrorism.

Referrals can be made to the PREVENT team at prevent@herts.pnn.Police.uk, using the appropriate referral form.

The police have Prevent Engagement Officers (PEO's) who work with the public and partner agencies to prevent terrorism and violent extremism from taking root in our communities. These officers aim to safeguard individuals and institutions from all forms of terrorist ideology and work closely with partner agencies such as local authorities, schools, Universities and health institutions, to ensure communities are well placed to report and respond to terrorist related concerns.

The Police can be contacted to find out more around the Prevent strategy or to express concerns about links to terrorism or violent extremism. (See Prevent and Anti-Radicalisation Policy for further details)

All guest speakers invited to address pupils, staff and/or parents will be approved by the Head of Curriculum or Head of Operations in advance of arriving onsite. They will assess the suitability of all guest speakers, at all times paying due regard to Prevent Duty guidance, and reserves the right to cancel the appearance of any guest speaker if they have any reservations as to their suitability to address any members of the college community.

22. ATTENDANCE

The college recognises that a young person going missing from education is a potential indicator of abuse or neglect and has in place procedures to follow up on unauthorised absences.

Parents or guardians are required to ensure that their children receive efficient, full-time education. The college is responsible for recording student attendance twice a day; once at the start of the morning session and once during the afternoon session. Attendance is monitored through such registration, and a record is kept.

Students are encouraged to take full advantage of their educational opportunities through maximum attendance, and are expected to attend all prescribed lessons and activities. Parents and teachers have a duty to ensure that students attend school for every school day except in the case of illness or if prior permission for absence has been granted. (See 'Attendance Policy' for further details)

23. RECORDS AND MONITORING

Why recording is important

Our staff will be encouraged to understand why it is important that recording is timely, comprehensive and accurate and what the messages are from serious case reviews are in terms of recording and sharing information.

Any concerns about a child will be recorded and given to the DSL ASAP. All records will provide a factual and evidence based account and there will be accurate recording of any actions. Records will be signed, dated and, where appropriate, witnessed.

At no time will a staff take photographic evidence of any injuries or marks to a child's person. A body map will be used instead in accordance with recording guidance.

It may be appropriate for the DSL to open a secure safeguarding file and start a chronology page. This will help in building patterns and decision making.

We will feedback to the staff member any actions, however this will be on a need to know basis. It may not be appropriate for staff members to know every detail of the child's life.

The safeguarding file

The establishment of a safeguarding file is an important principle in terms of storing and collating information about young people which relates to either a safeguarding concern or an accumulation of welfare concerns which are outside of the usual range of concerns in ordinary life events.

It needs to be borne in mind that what constitutes a 'concern' for one child may not be a 'concern' for another and the particular child's circumstances and needs will differ i.e. a child subject to a child protection plan, looked after child, Child in Need may be looked at differently to a child recently bereaved, parental health issues etc. We will therefore use professional judgement when making this decision as will have clear links and discussions between pastoral staff and DSL's.

This file will be kept separately from the main student file and **will be held securely only to be accessed by appropriately trained people. The main file, open to staff, will have a marker to signify that a separate safeguarding file exists for that child so that all staff coming into contact with that child are aware that an additional vulnerability exists.**

The college will keep written records of concerns about young people even where there is no need to refer the matter to external agencies immediately. Each child will have an individual file i.e. no family files.

All incidents/episodes will be recorded e.g. phone calls to other agencies, in the chronology with more detail and analysis in the body of the file. This will help build a picture and help the DSL in analysis and action, which may include no further action, monitoring, whether a CAF (level 3) should be undertaken, or whether a referral should be made to other agencies - Social Care Direct/Early Help Hubs in line with the Continuum of Need document (see link in appendix) and reflecting the Signs Of Safety approach.

In cases where there is multi agency involvement - meetings and plans, actions and responsibilities shall be clarified and outcomes recorded.

Files will be made available for external scrutiny for example by a regulatory agency or because of a serious case review or audit.

Records will be kept up to date and **reviewed regularly by the DSL** to evidence and support actions taken by staff in discharging their safeguarding arrangements.

The file can be non-active in terms of monitoring i.e. a child is no longer LAC, subject to a child protection plan. If future concerns then arise it can be re-activated and indicated as such on the front sheet and on the chronology as new information arises.

If the child moves to another college, the file will be securely sent or taken, to the DSL at the new establishment/College and a **written receipt will be obtained**. There will be a timely liaison between each College's DSL to ensure a smooth and safe transition for the child. We will retain a copy of the chronology to evidence actions, in accordance with record retention guidance.

APPENDICES

APPENDIX A – ABUSE

Definition of Abuse from Keeping Children Safe in Education 2019

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

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

A child or young person is considered to be abused or at risk of abuse when the basic needs of the child are not being met through avoidable acts of either commission or omission. The harm includes neglect, ill-treatment, physical, sexual or emotional abuse, impairment of physical or mental health or impairment of physical, intellectual, emotional or social development. All members of staff should familiarise themselves with the typical signs and symptoms as set out below

Child Abuse can be categorised in four types:

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or

grooming a child in preparation for abuse. Sexual abuse can take place online, 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. The sexual abuse of children by other children is a specific safeguarding issue in education (see section 5 iv)

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

It should always be born in mind that a child may be suffering from any combination of these.

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

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and

- Children who regularly miss school or education or do not take part in education.

General Indicators of Child Neglect and Abuse

There are a number of indicators that have been put forward by professionals in the field of child protection in order to raise awareness in those who are working on a daily basis with children and their families. The following lists have indicators which apply to children and their parents.

Parents who may neglect or abuse their children may exhibit the following:

- Rejection of the child
- Rough handling of the child
- Failure to keep appointments with childcare staff
- Frequent visits to the medical services with trivial complaints about the child or themselves

Children who may be suffering from neglect or abuse may exhibit the following:

- Unexplained failure to thrive
- Injuries that are inconsistent with the accident as described by the parents
- Frequent bruising, cuts, burns, etc.
- Frozen awareness, when the child carefully watches adults' expressions and movements
- Reluctance to be alone with their carer/s (e.g. teacher/ coach)
- Sudden unexplained changes in their reactions towards their carer/s

Not all children who have been neglected or abused will show all, or any, of these indicators, and one indicator alone may not denote that a child is being abused. A number of children may exhibit "failure to thrive" and doctors may not be able to find any reasonable explanation for this but this does not necessarily indicate that they have been a victim of abuse. A child with a combination of indicators who has a parent who is also exhibiting one of more of the adult indicators could lead a carer to suspect that they may be dealing with a case of abuse or neglect.

In the area of child sexual abuse there is a different set of indicators; most of these are related to the behaviour of the child:

- Sudden changes in personality, such as wanting constant attention and reassurance
- Lack of trust of a familiar adult
- Aggressive or compliant behaviour
- Withdrawal, listlessness, sadness
- Fear of being alone
- Showing affection in a sexual way inappropriate to their age
- Eating problems, loss of appetite, problems swallowing, excessive eating

Specific Indicators of Various Forms of Child Neglect and Abuse

Neglect:

Physical Indicators

- Poor hygiene
- Inadequately clothed, dirty, torn or inappropriate clothing

- Untreated medical problems
- Poor nourishment/failure to thrive
- Emaciation

Behavioural Indicators

- Tired or listless
- Low self-esteem
- Always hungry

Physical Abuse:

Physical Indicators

- Unexplained bruising in places where an injury cannot easily be sustained or explained
- Facial bruising
- Hand or finger marks or pressure bruising
- Bite marks

Sexual Abuse:

Physical Indicators

- Bruises or scratches inconsistent with accidental injury
- Difficulty in walking or sitting
- Pain or itching in the genital area
- Torn, stained or bloody underclothes
- Loss of appetite

Emotional Abuse:

- Attention seeking
- Withdrawn
- Telling lies
- Inability to have fun
- Low self-esteem
- Tantrums past the age when they are part of normal development
- Speech disorders e.g. stammering
- Inability to play
- Indiscriminately affectionate

- States that there is no one at home to look after them or indicates that they spend a lot of time at home alone

- Burns (particularly cigarette burns), scalds

- Unexplained fractures

Behavioural Indicators

- Shying away from physical contact
- Withdrawn or aggressive behaviour
- Sudden changes in behaviour, e.g. from extrovert to introvert
- Lacerations or abrasions

Behavioural Indicators

- Sexually precocious, uses seductive behaviour towards adults
- Uses sexually explicit language
- Excessive preoccupation with sexual matters
- Informed knowledge of adult sexual behaviour
- Poor self-esteem
- Withdrawn or isolated from other children

APPENDIX B – ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD

It is the responsibility of staff to report and record their concerns as soon as possible.

We actively encourage a ‘never do nothing’ attitude if staff have a concern about a child and promote discussion with DSL if in any doubt.

It is not their responsibility to investigate or decide whether a child has been abused.

Any child, in any family in any college could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”.

Key points for staff to remember for taking action are:

- If an emergency take the action necessary to help the child, for example, call 999
- **REPORT your concern to the DSL as soon as possible and certainly by the end of the day**
- **RECORD your concern and immediately pass onto to the DSL**
- Do not start your own investigation
- Share information on a need-to-know basis only – do not discuss the issue unnecessarily with colleagues, friends or family.
- Seek support for yourself if you are distressed.

Reports of concerns about a child should be made to the Hertfordshire Safeguarding Children Partnership on 0300 123 4043

Reports of concerns under the Prevent duty should be made to the PREVENT team at prevent@herts.pnn.Police.uk, using the appropriate referral form.

APPENDIX C – ROLE OF DESIGNATED SAFEGUARDING LEAD

See job description in safeguarding folder

APPENDIX D – USEFUL CONTACTS

Champneys Spa Director Laura Tatlow laura.tatlow@champneys.com 07920 468419
Champneys General Manager Robert Ledward-Smith Robert.ledward-smith@champneys.com

Hertfordshire Safeguarding Children Partnership

<https://www.hertfordshire.gov.uk/services/Childrens-social-care/Child-protection/Hertfordshire-Safeguarding-Children-Partnership/hscp.aspx>

Hertfordshire Safeguarding Children Partnership Team
Room 152
Postal Point CHO116
County Hall
Hertford
SG13 3DQ

01992 588757

admin.hscp@hertfordshire.gov.uk

Call anytime 0300 123 4043

Hertfordshire Safeguarding Adults Board

<https://www.hertfordshire.gov.uk/services/Adult-social-services/Report-a-concern-about-an-adult/Hertfordshire-Safeguarding-Adults-Board/Hertfordshire-Safeguarding-Adults-Board.aspx>

Call anytime **0300 123 4042**

Abuse Service

0800 915 1561

NSPCC Primary Colleges service

Michelle Poucher. Area Coordinator

07834 498 354 mpoucher@nspcc.org.uk

<http://www.nspcc.org.uk/services-and-resources/>

Prevent Police Officer

<https://www.herts.police.uk/Information-and-services/Advice/Child-sexual-exploitation/>

Web chat

Phone 101

NSPCC Whistleblowing Helpline

0800 028 0285

National Association People Abused in Childhood NAPAC

<http://www.mindingyourhead.info/service/napac-national-association-people-abused-childhood>

Stop It Now

Leading charity working in the field of sexual abuse. Also provides support for people who are worried about their own thoughts or behaviour towards young people.

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