

Child Protection and Safeguarding Policy



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1. Context and Rationale

Unity College fully recognises the contribution we can make to protect children from harm and to support and promote the welfare of all children who are students at our school. This policy applies to all stakeholders; this includes students, staff, parents and carers, governors, volunteers, placement students and visitors.

This policy will give clear direction to all stakeholders about expectations and our legal and moral responsibility to safeguard and promote the welfare of all children at our college.

Unity College is committed to safeguarding and promoting the physical, mental and emotional welfare of every student. We implement a whole-college preventative approach to managing safeguarding concerns, ensuring that the wellbeing of students is at the forefront of all action taken. We recognise that **no single professional can have a full picture of a child's needs** and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the governing board, the Headteacher, staff and all stakeholders understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL, Deputy DSLs or Assistant DSLs. In addition, to ensure that staff are aware that **anyone** can make a referral and understand professional challenge.
- Teaching students how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any student that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Endeavour to provide a safe and welcoming environment where children are respected and valued; where the voice of the child is listened to and is paramount.
- Where it is believed that a child is at risk of or is suffering significant harm, Unity College will follow the **procedures** set out by our local Safeguarding Children Partnership arrangements.

2. Definitions

The terms “**children**” and “**child**” refer to anyone under the age of 18.

The purpose of this safeguarding policy is to ensure every student at Unity College is safe and protected from harm. The Department for Education (DfE) **Keeping Children Safe in Education** (September 2023), states safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- and*
- taking action to enable all children to have the best outcomes.

Children can abuse other children. This is generally referred to as **child-on-child abuse** and can take many forms. This can include (but is not limited to) bullying (including cyberbullying, prejudice-based and discriminatory bullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; upskirting; initiating/hazing type violence and rituals; abuse in intimate personal relationships between children; consensual or non-consensual

sharing of nudes or semi-nude images or videos, or causing someone to engage in sexual activity without consent.

For the purposes of this policy, "**sexual violence**" refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, "**sexual harassment**" refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of college. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling
- Sexual "jokes" and taunting
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos
 - Sharing unwanted explicit content
 - Upskirting
 - Sexualised online bullying
 - Unwanted sexual comments and messages, including on social media
 - Sexual exploitation, coercion, and threats

Upskirting refers to the act, as identified in the **Voyeurism (Offences) Act 2019**, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

Consensual and non-consensual sharing of nude and semi-nude images and/or videos, colloquially known as "**sexting**" and "**youth produced imagery**", is defined as the sharing between students of sexually explicit

content, including indecent imagery. Indecent imagery is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

Consent is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

3. Law and Guidance

This policy has due regard to all relevant **legislation and statutory guidance** including, but not limited to:

Education Act 2002: Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children. Section 157 of the same act and the Education (Independent Schools Standards) (England) Regulations 2003 require proprietors of independent schools (including academies) to have arrangements to safeguard and promote the welfare of children.

Working Together to Safeguard Children 2018 guides education establishments of their role within inter-agency working to safeguard and promote the welfare of children. This is the government's statutory guidance for all organisations and agencies who work with, or carry out work related to, children in the United Kingdom.

Keeping Children Safe in Education, September 2023: The Department for Education (DfE) has updated the statutory safeguarding and child protection guidance for schools and colleges in England, Keeping Children Safe in Education. This guidance sets out what schools and colleges in England must do to safeguard and promote the welfare of children and young people under the age of 18.

Guidance for Safer Working Practice 2022

The Children Act 1989 & 2004

The Prevent Duty – The Prevent duty is the duty in the Counter-Terrorism and Security Act 2015 that sets out guidance for the LA and its partners to have due regard to the need to prevent people from being drawn into terrorism.

Female Genital Mutilation Act 2003 as inserted by the Serious Crime Act 2015

Sexual Offences Act 2003

Equality Act 2010

Counter-Terrorism and Security Act 2015

Domestic Abuse Act 2021

PACE Code C 2019

Data Protection Act 2018

Marriage and Civil Partnership Act 2022

Relevant Non-Statutory Guidance

- DfE (2015) '[What to do if you're worried a child is being abused](#)'
- DfE (2018) '[Information sharing](#)'
- DfE (2020) '[Governance handbook](#)'
- DfE (2017) '[Child sexual exploitation](#)'
- DfE (2022) '[Recruit teachers from overseas](#)'
- UKCIS (2020) '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)'
- DfE (2022) '[Working together to improve school attendance](#)'
- DfE (2023) '[Meeting digital and technology standards in schools and colleges](#)'
- DfE (2022) '[Searching, Screening and Confiscation](#)'

This policy operates in conjunction with the following college policies:

- Attendance Policy
- Anti-Bullying Policy
- Online Safety Policy
- Data Protection Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy
- Staff Code of Conduct
- Behaviour Policy
- Managing Students with Medical Conditions Policy
- Complaints Policy

4. Roles and Responsibilities

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the student with a **child-centred approach**
- Contribute to, and maintain a **high safeguarding ethos** within the setting, with safeguarding students at the forefront of practice, at all times
- Ensure **all** children have opportunities to communicate and know that they are **listened to and understood**
- Contribute to **providing a curriculum** which will equip all children with the skills to keep themselves safe and develop an attitude which will enable them to enter adulthood successfully and reach their full potential
- Establish effective, supportive, and **positive relationships** with parents and carers, carers, students and other professionals
- Maintain an attitude of '**it could happen here**' where safeguarding is concerned
- Be proactive to provide a **safe and secure environment** in which pupils can learn
- Be prepared to **identify** students or families who may benefit from **early help**

- Be aware of the **College's individual procedures** that support safeguarding, including all policies, internal reporting procedures, information and engage with training provided
- Be aware of the role and **identity of the DSL and deputy DSLs** and seek them for advice if required
- Undertake **safeguarding training**, including online safety training, during induction and subsequently on a regular basis (at least annually), (which, amongst other things, includes an understanding of the expectations and responsibilities **relating to filtering and monitoring**) including receiving bulletins, emails and briefings. Staff should undertake **Prevent awareness training** at least every two years
- Be aware of the **local early help process** and understand their role in it.
- Be aware of, and understand, the process for making referrals to Children's Social Care, understanding that **anyone can make a referral**
- Understand how to make a referral to CSC and/or the police immediately, if at any point there is **a risk of immediate serious harm to a child**
- Be aware of and **understand the procedure to follow** in the event that a child confides they are being abused, exploited or neglected, in a timely manner
- Maintain appropriate **levels of confidentiality** when dealing with individual cases
- **Reassure victims** that they are being taken seriously, that they will be supported, and that they will be kept safe
- Be aware of **safeguarding issues** that can put students at risk of harm
- **Be aware of behaviours linked to issues** such as drug-taking, alcohol misuse, deliberately missing education, sharing indecent images, extremist behaviours and other signs that students may be at risk of harm
- Be fully aware of the importance of **mental health in relation to safeguarding** and that all staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- Be aware that **a student may not feel ready** or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Understand the process for reporting **concerns over professional adults**

Teachers, including the Headteacher, have a responsibility to:

- Safeguard students' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the **'Teachers' Standards'**
- Report, by law, any disclosures of FGM to the police

The governing board has a duty to:

- Take **strategic leadership responsibility** for the College's safeguarding arrangements
- Ensure that the College **complies with its duties** under the above child protection and safeguarding legislation
- Ensure that all governors receive **appropriate safeguarding and child protection training** upon their induction and that this training is updated regularly
- Ensure that staff **read, understand and follow** part one **and Annex B of KCSIE September 2023**
- Ensure a **named Governor takes leadership responsibility** for safeguarding arrangements and receives appropriate training in the management of safeguarding
- Attend **Prevent training** at least every two years
- Appoint an appropriate member of staff from the SLT to the **role of DSL** and one or more deputy DSLs to provide support and ensure that they are trained to the same standard as the DSL ensuring that the

roles are explicit in their job descriptions. Ensure the provision of appropriate support, funding, training, resources, and time to carry out their role

- Support and monitor a **whole-school approach to safeguarding**; this includes ensuring that safeguarding and child protection are at the forefront and **ethos** remains consistently high
- Ensure **systems are in place so that children to confidently report abuse**, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible. Ensure that the **voice of the child** is heard and acted upon
- Ensure **effective and appropriate policies** and procedures are in place
- Make sure that **students are taught about safeguarding**, that safeguarding is embedded within the curriculum, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum
- Adhere to statutory responsibilities by conducting **pre-employment checks on staff** who work with children
- Ensure the College has **clear systems and processes in place for identifying possible mental health problems in students**, including clear routes to escalate concerns and clear referral and accountability systems
- Ensure that at least one person on any recruitment panel has undertaken **safer recruitment training**
- Ensure that **all staff receive relevant safeguarding and child protection training** updates, including online safety and expectations and responsibilities relating to filtering and monitoring systems e.g. emails, as required, but at least annually, including a thorough induction
- Confirm that there are transparent procedures in place to handle **allegations against staff**, supply staff, volunteers and contractors
- Confirm that there are **procedures in place to make a referral to the DBS** and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned
- Ensure that appropriate disciplinary procedures are in place, as well as **policies pertaining to the behaviour of students and staff**
- Ensure that **procedures are in place to eliminate unlawful discrimination**, harassment and victimisation, including those in relation to child-on-child abuse
- Appoint a **designated lead to promote the educational achievement of CLA** and ensure that this person has undergone appropriate training
- Ensure that the **appropriate level of check** is completed on Governors
- Create a culture where **staff are confident to challenge** senior leaders over any safeguarding concerns
- Understand that online safeguarding is an interrelated and running theme through safeguarding practice. Ensure that **children are safe online** by ensuring that **appropriate filters and monitoring systems are in place** and regularly review their effectiveness, understanding those children that are potentially at greater risk of harm, along with the proportionality of costs versus safeguarding risks
- Put in place appropriate safeguarding responses for students who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation and prevent the risk of escalation in the future
- Ensure staff in college are aware of, and policies are personalised to reflect, an understanding of specific issues such as **child-on-child abuse** and safeguarding children with disabilities and special educational needs

- Partake and complete the **S175/175 audit tool** on a two yearly cycle (at least) as directed by the Local Authority
- Be aware of their obligations under the **Human Rights Act 1998**, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements
- Ensure that all practice and procedures operate with the best interests of the child at the centre with a **firm child centred approach**.

The DSL has a duty to:

- The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place, ensuring their effectiveness) whilst creating a culture of safeguarding throughout the setting, continually raising the profile
- Provide **advice, support and expertise to other staff** on child welfare, safeguarding and child protection matters
- **Take part in strategy discussions**, inter-agency meetings and Child Protection Conferences and/or support other staff to do so
- **Contribute to the** assessment of students, and/or support other staff to do so
- Ensure that all staff receive appropriate safeguarding training at induction, including online safety and expectations and responsibilities relating to filtering and monitoring. This is updated regularly, at least annually
- **Be available** during college hours for staff to discuss any safeguarding concerns
- Arrange, alongside the College, adequate and **appropriate cover** for any activities outside of college hours or terms
- Refer cases:
 - To CSC where abuse and neglect are suspected, and support staff who make referrals CSC
 - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme
 - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
 - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance
- Act as a **point of contact** with the multi-agency partners
- Ensure **effective communication** and information sharing (when appropriate) between Deputy DSLs/ Assistant DSLs, Pastoral Team/ SLT/Governors/ Head teacher.
- Liaise with staff when deciding whether to make a referral by **liaising with relevant agencies** so that students' needs are considered holistically
- Liaise with the **senior mental health lead** and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health
- Promote **supportive engagement with parents and carers** in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Work with relevant staff, **taking lead responsibility for promoting educational outcomes** for children, by understanding the lasting impact that adversity and trauma can have on children's behaviour, mental health and wellbeing, knowing the safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:

- Ensuring that the College knows which students have or had a social worker
- Understanding the academic progress and attainment of these students
- Maintaining a culture of high aspirations for these students
- Supporting teachers to provide additional academic support or reasonable adjustments to help these students reach their potential
- Ensure that **child protection files are kept updated** and secure, monitoring the quality and accuracy of logs
- Ensure that a student's child protection **file is transferred** as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared to support a child's journey
- Ensure **all stakeholders understand the Child Protection Policy**, Keeping Children Safe in Education 2023 statutory guidance and internal procedures to report any concerns are transparent and understood by all. Ensure this information is given in **induction** and at regular intervals/ training
- Work with the governing board to ensure the College's **Child Protection and Safeguarding Policy is reviewed annually**, and the procedures are updated and reviewed regularly
- Undergo **DSL initial training**, and update this training with refresher training at least every two years to remain compliant
- Ensure opportunities for **further training** and opportunities for upskilling are taken
- Have due regard to the **PACE Code C 2019** in regards to the role of an appropriate adult
- Encourage a culture of listening to children promoting **the voice of the child**
- **Recognise the importance of information sharing**, including within college, with other schools and with the safeguarding partners and other agencies by understanding relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR
- Undertake **Prevent** awareness training (at least) every two years
- Be provided with appropriate support and **supervision** in order to carry out the role safely and effectively
- Liaise with the Local Authority Personal Advisors for any Care Leavers
- Have due regard to Appendix C of Keeping Children Safe in Education 2023– 'The Role of the Designated Safeguarding Lead'

Unity College recognises that Deputy DSLs must be trained to same standard as the DSL.

The designated lead has a responsibility for promoting the educational achievement of CLA and previously CLA (PLAC), and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. In our setting, this is Beverley Worthington.

5. Training and Induction

Unity College recognise the importance of ongoing staff training and development to keep staff aware of emerging issues and keeping the ethos of safeguarding high. Everybody has a role to play in safeguarding our children and we strive to ensure all staff are well informed and know what to do if they have any concerns. Staff members, governors and volunteers will undergo safeguarding and child protection training at induction, which will be updated on a regular basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy
- The Staff Code of Conduct
- Part One and Annex B of 'Keeping children safe in education' (KCSIE 2023)
- The Behaviour Policy
- The Attendance Policy, including the safeguarding response to children who have unexplained absences or go missing from education
- Appropriate child protection and safeguarding training, including online safety training
- Information about the role and identity of the DSL and deputy DSLs
- How to record concerns in our setting

Records will be kept of all inductions.

Following induction, Unity College recognises the need to ensure continual, effective training to staff and other stakeholders. We will ensure:

- ALL staff, governors and volunteers will receive Safeguarding Training (at least) annually
- The DSLs will provide **all** staff, volunteers and governors with regular safeguarding updates
- **All** staff, volunteers and governors will read, and show an understanding of, any updates that are provided
- DSLs will attend DSL training every two years and update their knowledge, skills and understanding of relevant safeguarding issues on a regular basis
- The DSLs, along with governors and all staff, will undertake Prevent awareness training (at least) every two years
- That at least one person on any recruitment panel has undertaken safer recruitment training
- **All** staff, volunteers and governors will undertake any additional specialised training on matters such as Child Sexual Exploitation, Prevent, Child-on-Child abuse, Online Safety, FGM etc as is deemed necessary by the SLT and DSL and that is particularly relevant to the context and needs of the setting
- Any staff member will discuss any specific training requirements or gaps in knowledge or understanding with the DSLs
- Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the College
- Detailed records will be held of staff safeguarding training and ensure that no training becomes out of date

6. Multi-Agency Working

The College contributes to multi-agency working as part of its statutory duty. The College is aware of and will follow the [local safeguarding arrangements](#).

The College will be fully engaged, involved, and share information with local safeguarding arrangements. Once the College is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

The College will work with Children & Family Wellbeing Team, CSC, the Police, Health services and other relevant partners and agencies for the benefit of families and children ensuring contribution to multi-agency plans to provide additional support.

Where a need for early help is identified, the school will allow access for CSC from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

Unity College also recognises the particular importance of inter-agency working in identifying and preventing CSE and CCE.

Information sharing

The College recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet students' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes: data protection regulations do not act as a barrier to sharing information where failure to do so would result in the child being placed at risk of harm.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of students. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

7. Early Help

Early help means providing support as soon as the need emerges, at any point in a child's life. Staff at Unity College recognise that any professional can provide early help. Any student or family may benefit from early help, but staff will be alert to the potential need specifically for early help for students who:

- are disabled, have certain health conditions, or have specific additional needs
- have SEND, regardless of whether they have a statutory EHC plan
- have mental health needs
- are young carers
- show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- are frequently missing or going missing from care or from home
- are at risk of modern slavery, trafficking, or sexual or criminal exploitation
- are at risk of being radicalised
- is misusing drugs or alcohol
- have family members in prison, or are affected by parental offending
- are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse
- have returned home to their family from care
- are at risk of HBA, such as FGM or forced marriage
- are privately fostered
- are displaying harmful sexual behaviours which may pose a risk to other children and themselves
- are persistently absent from education, including persistent absences for part of the school day
- show any other early signs of abuse, neglect any other identified reason not listed above that requires extra support or intervention to improve outcomes for families and children

The Heads of Year / Deputy Heads of Year or other appropriate personnel will take the lead where early help is appropriate and consent has been gained. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The [local early help process](#) will be followed as required to help provide the right, effective support at the right time.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review assessing the impact of the support.

We therefore ensure that:

- All staff and volunteers can identify the risk factors that indicate a family or student may benefit from Early Help and can follow college procedures to share this with the DSL
- The Heads of Year, Deputy Heads of Year or other appropriate personnel will undertake a Family Early Help Assessment, when appropriate, to identify what Early Help is required
- DSLs will signpost and refer to appropriate support agencies or support other appropriate staff to do so
- DSLs identify appropriate staff who will lead on TAF meetings where it is appropriate for them to do so

DSLs will follow the local safeguarding processes and refer to [Working Well with Children and Families in Lancashire](#) guidance using the Continuum of Need or support other appropriate staff to do so.

8. Abuse and Neglect

Abuse is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. *via the internet*. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

Physical abuse is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, biting, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child. Staff are aware of Female Genital Mutilation, a form of Physical abuse.

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

Sexual abuse is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

Neglect is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

- **All** staff will be aware of the indicators of abuse and neglect and be vigilant and always raise concerns with the DSL/deputy DSLs. All staff, especially the DSL and deputy DSLs will be aware that safeguarding incidents and/or behaviours can be associated with contextual factors outside the College and/or can occur between children outside of these environments; this includes being aware that students can at risk of abuse or exploitation in situations outside their families (extra-familial harms.)
- **All** staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, radicalisation and the sharing of indecent images.
- **All** staff understand that children who perpetrate abuse or display harmful behaviour should be treated as victims first and foremost and supported in the same way a victim of abuse would be supported - Risk Assessments will be undertaken where a child's behaviour poses a risk to others, themselves or the environment.
- **All** staff and volunteers understand that there are specific and emerging ways in which children can be abused and are aware of these specific issues, reporting any concerns, in the appropriate manner to the DSL/deputy DSLs. Specific issues include (but are not limited to):

9. Domestic Abuse

In line with the **Domestic Abuse Act 2021**, **domestic abuse** is defined as abusive behaviour of a person towards another person where both are aged 16 or over and are personally connected. **Abusive behaviour** includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse.

The College will recognise the serious, long lasting emotional impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Unity College has commitment to **Operation Encompass** and informing all stakeholders of the initiative. The lead person for Operation Encompass **Beverley Worthington**.

10. Homelessness

The DSL and deputy DSLs are aware of the contact details and referral routes into the Local Housing Authority so that concerns and support over homelessness can be raised as early as possible. Indicators that a family may be at risk of homelessness include:

- household debt
- rent arrears
- domestic abuse
- anti-social behaviour
- any mention of a family moving home because "they have to" or frequent moves

Referrals to the Local Housing Authority do not replace referrals to CSC where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSC will be made as necessary where concerns are raised.

11. Children Absent from School

Staff will be aware a child being absent from school is a potential indicator of abuse or neglect and, as such, these students are particularly at risk of being victims of harm, sexual and criminal exploitation, forced marriage, female genital mutilation or radicalisation.

Staff will monitor students that are absent from school, particularly on repeat occasions, and report them to appropriate personnel following normal safeguarding procedures, and in accordance with the College *Attendance Policy*.

The College will inform the LA of any student who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more, in accordance with LA protocol.

Where reasonably possible the College **will hold more than one emergency contact number for students**.

Unity College will follow [local guidance](#) when children go missing from home.

12. Children Attending an Approved Educational Activity

An approved educational activity is where a student is attending another school at which they are registered or taking part in off-site activity such as field trips, educational visits, work experience or unregistered alternative provision.

Students can only be recorded as attending an off-site activity if it is approved by the College, of an educational nature and supervised by someone authorised by the College. Ultimately, the College is responsible for the safeguarding and welfare of students taking part in an off-site educational activity so it would be reasonable to expect that the College would only authorise someone who was answerable to the College to supervise an activity. Such activities include:

- dual registered at another school
- participating in a supervised sporting activity
- educational visit or trip
- work experience

All relevant college policies continue to apply throughout any approved educational activity. Any activity which is approved will be risk assessed (where relevant) and the College will ensure that attendance at any activity is monitored and robust communication is agreed with the provider/accompanying adults.

13. Child Criminal Exploitation (CCE)

Child criminal exploitation is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- in exchange for something the victim needs or wants
- for the financial advantage or other advantage of the perpetrator or facilitator
- through violence or the threat of violence (this could be online or through technology)

Specific forms of CCE can include:

- being forced or manipulated into transporting drugs or money through county lines
- working in cannabis factories.
- shoplifting or pickpocketing

- committing vehicle crime
- committing, or threatening to commit, serious violence to others

The College will recognise that students involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The College will also recognise that students of **any gender** are at risk of CCE.

College staff will be aware of the indicators that a student is the victim of CCE, including:

- associating with other children involved in exploitation
- suffering from changes in emotional wellbeing
- misusing drugs or alcohol
- going missing for periods of time or regularly coming home late
- regularly missing college or education
- appearing with unexplained gifts, money or new possessions

Criminal exploitation of children can include **County Lines**. This is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or criminal networks / gangs groom and exploit children and young people to carry drugs and money into one or more areas. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked or the purpose of transporting drugs and a referral to the **National Referral Mechanism** should be considered in addition to normal safeguarding procedures.

As well as the general indicators for CCE, college staff will be aware of the specific indicators that a student may be involved in county lines, including:

- going missing and subsequently being found in areas away from their home
- having been the victim or perpetrator of serious violence, e.g. knife crime
- receiving requests for drugs via a phone line, moving drugs, collecting money
- being found in accommodation they have no connection
- owing a 'debt bond' to their exploiters
- having their bank account used to facilitate drug dealing

14. Child Sexual Exploitation (CSE)

Child Sexual Exploitation is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- in exchange for something the victim needs or wants
- for the financial advantage, increased status or other advantage of the perpetrator or facilitator
- through violence or the threat of violence, this could be online or through technology

The College will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the student's immediate knowledge, *e.g. through others sharing videos or images of them on social media*. The College will recognise that CSE can affect any student who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes students aged 16 and above who can legally consent to sexual activity. The College will also recognise that students may not realise they are being exploited and they believe they are in a genuine romantic relationship.

College staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- appearing with unexplained gifts, money or new possessions.

- associating with other children involved in exploitation
- suffering from changes in emotional wellbeing
- misusing drugs or alcohol
- going missing for periods of time or regularly coming home late
- regularly missing college or education or not taking part
- having older boyfriends or girlfriends
- suffering from sexually transmitted infections
- displaying sexual behaviours beyond expected sexual development
- becoming pregnant

All staff will consider the language and terms used when raising concerns and providing ongoing support to students who have experienced abuse through exploitation to ensure victims are not unintentionally blamed or seen as active participants in their own abuse.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL/deputy DSL. If after discussion a concern remains, local safeguarding procedures will be triggered.

15. Concealed and Denied Pregnancy

A concealed pregnancy is when a woman knows she is pregnant but does not tell anyone; or when she tells a professional but conceals the fact that she is not accessing antenatal care; or when she tells another person or persons and together they conceal the fact from all agencies. A denied pregnancy is when an expectant mother is unaware of or unable to accept the existence of her pregnancy. Physical changes to the body may not be present or be misconstrued; they may be intellectually aware of the pregnancy but continue to think, feel and behave as though they were not pregnant. There may be a number of reasons why a pregnancy is concealed or denied, including, but not limited to: fear of stigma or shame; in cases of rape, sexual or domestic abuse, forced or sham marriage; fear of a child being removed or asylum seekers and illegal immigrants who may be reluctant to come to the attention of authorities. In some cases, the woman may be truly unaware that she is pregnant. In some cases, an expectant mother may be in denial of her pregnancy.

Where there is a suspicion of a concealed or denied pregnancy, the College will follow [the procedures](#) set out by our local Safeguarding Children Partnership arrangements.

[Further training](#) is available for staff regarding concealed or denied pregnancy.

16. Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a student may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism. The public authority (including schools) bears this obligation where it has *'reasonable grounds to believe that a person may be a victim of slavery or human trafficking.'* (From [The Modern Slavery Act 2015](#), Section 52).

17. Female Genital Mutilation (FGM)

FGM is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a student being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSC and/or the police. The College's procedures relating to managing cases of FGM and protecting students will reflect multi-agency working arrangements.

As outlined in Section 5B of the **Female Genital Mutilation Act 2003** (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a student under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine students, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL / Deputy DSL and involve CSC as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that students may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the student. It is important to note that the student may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a student may be at heightened risk of undergoing FGM include:

- the socio-economic position of the family and their level of integration into UK society
- the student coming from a community known to adopt FGM
- any girl with a mother or sister who has been subjected to FGM
- any girl withdrawn from ID (PSHE)
 - travel abroad or a long holiday with relatives to a country known to practise FGM

FGM is included in the definition of **'honour-based' abuse (HBA)** which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

18. Forced Marriage

Forced marriage is defined as a marriage that is entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Threats can be physical, emotional, or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. *due to some forms of SEND*. Forced marriage is a crime in the UK and a form of HBA.

Staff who have any concerns regarding a student who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL and local safeguarding procedures will be followed; this could include referral to CSC, the Police or the Forced Marriage Unit. It will be made clear to staff members that they should not approach the student's family or those with influence in the community, without the express consent of the student, as this will alert them to the concerns and may place the student in further danger.

The **Marriage and Civil Partnership (Minimum Age) Act 2022**, which gained Royal Assent in April 2022, came into force on 27 February 2023. It means that 16- and 17-year olds are no longer be allowed to marry or enter a civil partnership, even if they have parental consent.

It is now illegal and a criminal offence to exploit vulnerable children by arranging for them to marry, under any circumstances whether or not force is used.

19. Extremism and Radicalisation

Extremism refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting students from the risk of radicalisation is part of the College's wider safeguarding duties. The College will actively assess the risk of students being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in students' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify students who may be at risk of radicalisation and act appropriately, which may include contacting the DSL/deputy DSL or making a Prevent referral. The College will work with local safeguarding arrangements as appropriate to ensure awareness of local and national incidents that may heighten the activity of extreme groups or cause increased curiosity of children.

The College will ensure that they engage with parents and carers and families, as they are in a key position to spot signs of radicalisation. In doing so, the College will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the student's parents and carers, unless the College has reason to believe that the child would be placed at risk as a result.

The DSL and/or deputy DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect students against the risk of radicalisation and ensure that all staff and governors have received appropriate and up-to-date training.

Whole College face to face Prevent training was most recently delivered to staff on 7 June, 27 June and 4 July 2023.

- The *Online Safety Policy* will support the safeguarding of children online by ensuring they cannot access terrorist and extremist material when using the internet and that suitable filtering and monitoring software and supervision is in place.
- The DSL and deputy DSLs understand when it is appropriate to make a referral to the Channel Panel and are aware of how to do so. 'Notice. Check. Share.'

The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as **the Prevent duty**, forming part of the school's wider safeguarding obligations.

Unity College will ensure that **all** staff, governors and volunteers are informed and have '**due regard to the need to prevent people from being drawn into terrorism**', known as the 'Prevent Duty' and follow guidance from [Lancashire Prevent Partnership](#) and the Prevent referral process.



Prevent%20&%20Channel%20referral%20

Prevent Lead	Beverley Worthington
Prevent Governor Lead	Anne Kelly
Prevent Curriculum Lead	Shameem Hudson

20. Private Fostering

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the [Children Act 1989](#). Where the College becomes aware of a student being privately fostered, they will notify CSC as soon as possible to allow the LA/CSC to conduct any necessary checks.

21. Students with Family Members in Prison

Students with a family member in prison will be offered pastoral support as necessary. Where appropriate, they will receive a copy of '[Are you a young person with a family member in prison?](#)' from *Action for Prisoners' Families* and be allowed the opportunity to discuss questions and concerns.

22. Child-on-Child Abuse (including sexualised abuse)

Unity College has a **zero-tolerance approach to abuse**, including child-on-child abuse.

Unity College staff can refer to the specific guidance in [Keeping Children Safe in Education Part five: Child on Child Sexual Violence and Sexual Harassment](#) and [Lancashire Procedures](#).

All staff will be aware that child-on-child abuse can occur between students of any age and gender, both inside and outside of college, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL/deputy DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenging inappropriate behaviour between peers and will not tolerate abuse as "banter" or "part of growing up".

Child-on-child abuse can be manifested in many different ways, including:

- bullying, including cyberbullying, and prejudice-based or discriminatory bullying
- abuse in intimate personal relationships between peers
- physical abuse: this may include an online element which facilitates, threatens and/or encourages physical abuse
- sexual violence: this may include an online element which facilitates, threatens and/or encourages sexual violence.
- sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent
- the consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- upskirting
- initiation and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

All staff will be clear as to the College's procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff will be made aware of the heightened vulnerability of students with SEND, who evidence suggests are more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the student's SEND and will always explore indicators further.

All staff will be made aware of the heightened vulnerability of LGBTQ+ students, who evidence suggests are also more likely to be targeted by their peers. In some cases, students who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ students. The College's response to sexual violence and sexual harassment between children of the same sex will be equally as robust as it is for incidents between children of the opposite sex.

Students will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Students will also be reassured that they will be taken seriously, be supported, and kept safe. This process will be continually reviewed by the DSL.

The DSL / Deputy DSL will consider:

- the wishes of the victim in terms of how they want to proceed
- the nature of the alleged incident
- the ages of the children involved
- the development stages of the children involved
- any power imbalance between the children
- is the incident a one-off or a sustained pattern of abuse
- are there ongoing risks to the victim, other children, or college staff
- contextual safeguarding issues

Following a report of sexual violence, the designated safeguarding lead (or deputy) will make an immediate risk and needs assessment, considering:

- the victim
- the alleged perpetrator
- all other children (and if appropriate adult students and staff)
- risk assessments (if required) will be recorded and kept under review as a minimum termly
- guidance in Keeping Children Safe in Education Sept 2023, Part 5

23. Serious Violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- increased absence from college
- a change in friendships
- relationships with older individuals or groups
- a significant decline in academic performance
- signs of self-harm
- a significant change in wellbeing
- signs of assault

- unexplained injuries
- unexplained gifts or new possessions

Staff will be made aware of some of the most significant risk factors that could increase a student's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- being male
- having been frequently absent from college
- having been permanently excluded from college
- having experienced child maltreatment or trauma
- having been involved in offending, such as theft or robbery

Staff members who suspect a student may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL/deputy DSL.

24. Online Safety

Unity College will adhere to its *Online Safety Policy* at all times and is committed to keeping children safe online. The College recognises that addressing online safety issues should form an integral part of the College's safeguarding arrangements.

As part of a broad and balanced curriculum, all students will be made aware of online risks and taught how to stay safe online.

The College will ensure that suitable filtering systems are in place on ICT equipment to prevent children accessing inappropriate material. This system will be monitored and reviewed with any inappropriate behaviours or searches being followed up appropriately.

Further information regarding the College's approach to online safety can be found in the *Online Safety Policy*.

When college become aware of an online safety issue that has occurred outside of school, it is managed in accordance with the *Online Safety Policy* and *Behaviour Policy*. Staff will be aware that ongoing in-person monitoring is required in addition to the software in place as it is vital staff don't rely solely on IT systems as this may leave some children vulnerable.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Personal electronic devices

The use of personal electronic devices, including mobile phones and cameras, by staff and students is closely monitored by the College, in accordance with the *Staff Code of Conduct* and *Behaviour Policy*.

Where photographs and videos will involve students who are CLA, adopted students, or students for whom there are security concerns, the Headteacher will liaise with the DSL /deputy DSL to determine the steps involved. The DSL/deputy DSL will, in known cases of students who are CLA or who have been adopted, liaise with the students' social workers, carers or adoptive parents and carers to assess the needs and risks associated with the students. For further information, see the College's *Photography and Video Use, Storage and Consent Policy*.

Staff will report any concerns about students' use of personal electronic devices to the DSL; staff will report any concerns about other staff members' use of personal electronic devices to the Headteacher, following the appropriate procedures. Unity College is committed to keeping students safe by ensuring that electronic devices such as cameras, phones and tablets are used in an appropriate manner.

Unity College will therefore ensure that:

- informed parental consent is obtained to take and use photographs and/or videos of students, for use in college, to market the College or to share on social media / internet
- staff, visitors, and volunteers do not use their own mobile phones or devices to take or record any images of children.

Upskirting

Under the [Voyeurism \(Offences\) Act 2019](#), it is an offence to operate equipment for the purpose of upskirting. “**Operating equipment**” includes enabling, or securing, activation by another person without that person’s knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by the College. Any incidents of upskirting will be reported to the DSL/deputy DSL, who will then decide on the next steps to take, which may include police involvement.

25. Sharing Nude and Semi-Nude Images

Formerly referred to as ‘Sexting’, sharing nudes and semi-nudes is defined as *‘the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums.’* (Sharing nudes and semi-nudes: advice for education settings - [UKCIS, 2020](#))

The College will ensure that all staff are aware to treat the sharing of indecent images-as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the student, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with such instances in the school community, including understanding motivations, assessing risks posed to students depicted in the images and how and when to report.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that students are not unnecessarily criminalised.

Where a member of staff becomes aware of an incidence of sharing nudes/semi-nudes that involves indecent images of a child, they will refer this to the DSL / Deputy DSL as soon as possible. Where a student confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:

- refrain from viewing, copy, printing, sharing, storing or saving the imagery
- tell the DSL/deputy DSL immediately if they accidentally view an indecent image and seek support
- explain to the student that the incident will need to be reported
- respond positively to the student without blaming or shaming anyone involved, and reassuring them that they can receive support in college as appropriate
- report the incident to the DSL/deputy DSL

The DSL/deputy DSL will attempt to understand what the image contains **without viewing it** and the context surrounding its creation and distribution – they will categorise the incident into one of two categories:

- **Aggravated:** incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes, including where there is an adult involved, where there is an intent to harm the pupil or where the images are used recklessly.
- **Experimental:** incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse.

Where it is necessary to view the imagery, e.g. if this is the only way to make a decision about whether to inform other agencies, the DSL/deputy DSL should:

- never copy, print, share, store or save them: this is illegal
- discuss the decision with the Headteacher or a member of the senior leadership team
- make sure viewing is undertaken by the DSL/deputy DSL or another member of the safeguarding team with delegated authority from the headteacher or a member of the senior leadership team
- make sure viewing takes place with another member of staff present in the room, ideally the headteacher or a member of the senior leadership team
- wherever possible, make sure viewing takes place on the premises of the education setting, ideally in a confidential office space
- make sure wherever possible that they are viewed by a staff member of the same sex as the child or young person in the images
- record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions
- if any devices need to be taken and passed onto the police, the device(s) should be confiscated and the police should be called

The above summarised points are explained in further detail with important supporting guidance in the UKCIS guidance – [Sharing nudes and semi-nudes: advice for education settings](#)

26. Context of Safeguarding Incidents

Safeguarding incidents can occur outside of college and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of students' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The College will provide as much contextual information as possible when making referrals to CSC or external agencies.

27. Students Potentially at Greater Risk of Harm

Unity College recognises that some groups of students can face additional safeguarding challenges, and understands that further barriers may exist when determining abuse and neglect in these groups of students. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outline below.

Students who need social workers

Students may need social workers due to safeguarding or welfare needs. These needs can leave students vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL/deputy DSL will hold and use information from the LA about whether a student has a social worker in order to make decisions in the best interests of the student's safety, welfare, and educational outcomes.

Where a student needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare and educational outcomes, e.g. *considering the provision pastoral or academic support and support with behaviour.*

Home-educated children

Parents and carers may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the **Education (Pupil Registration) (England) Regulations 2006**, Unity College will ensure it informs their LA of all deletions from the admissions register when a student is taken off roll.

Where a parent has expressed their intention to remove a student from college for EHE, the College and other key professionals who are involved, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

Where students are removed from roll for Elective Home Education and there are safeguarding concerns, college will ensure that concerns are shared with the LA.

CLA

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. Previously CLA, also known as care leavers, can also remain vulnerable after leaving care.

The College will ensure that the appropriate staff have the information they need, such as:

- looked after legal status, *i.e. whether they are looked after under voluntary arrangements with consent of parents and carers, or on an interim or full care order*
- contact arrangements with parents and carers or those with parental responsibility
- care arrangements and the levels of authority delegated to the carer by the authority looking after the student

Students with SEND

When managing safeguarding in relation to students with SEND, staff will be aware of the following:

- certain indicators of abuse, such as behaviour, mood and injury, may relate to the student's disability without further exploration; however, it should never be assumed that a student's indicators relate only to their disability
- students with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
- communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for students with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a student with SEND, the DSL/deputy DSL will liaise with the College's SENCO, as well as the student's parents and carers/carers, where appropriate, to ensure that the student's needs are met effectively.

LGBTQ+ students

The fact that a student may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ students can be targeted by other individuals. Staff will also be aware that, in some cases, a student who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as students who identify as LGBTQ+.

Staff will also be aware that the risks to these students can be compounded when they do not have a trusted adult with whom they can speak openly with. All staff will endeavour to reduce the additional barriers faced by these students and provide a safe space for them to speak out and share any concerns they have.

Adverse Childhood Experiences and trauma

We acknowledge that children who have experienced adverse childhood experiences and trauma may be at increased risk of developing health and social difficulties.

All staff will be made aware of the long-lasting impact of experiencing adversity and the lasting effect trauma can have on a child's development.

Where a student is known to have experienced trauma, appropriate arrangements will be made to provide support based on the needs of the student and in line with all relevant guidance and policies. This may include close multi-agency working with external services.

28. Extracurricular Activities and Use of College Premises by External Organisations

Extra-curricular activities and clubs hosted by external bodies, e.g. *charities or companies*, will work in collaboration with the College to effectively safeguard students and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of students. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSC or the police, if necessary.

Unity College will always consider safeguarding arrangements when an extracurricular activity or club is arranged in view of DSL/deputy DSL/safeguarding team availability.

29. Alternative Provision

The College will remain responsible for a student's welfare during their time at an alternative provider. When placing a student with an alternative provider, the College will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff and have clear communication procedures in place in view of attendance.

30. Managing Referrals

All staff members, in particular the DSL / Deputy DSLs / Assistant DSLs, will be aware of the LA's arrangements in place for managing referrals. The DSL / Deputy DSLs / Assistant DSLs will provide staff members with clarity and support where needed. When making a referral to CSC or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL / Deputy DSLs / Assistant DSLs will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the students involved. The DSL / Deputy DSLs / Assistant DSLs will work closely with the police to ensure the College does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a student has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The College will not wait for the start or outcome of an investigation before protecting the victim and other students: this applies to criminal investigations as well as those made by CSC. Where CSC decide that a statutory investigation is not appropriate, the College will consider referring the incident again if it is believed that the student is at risk of harm. Where CSC decide that a statutory investigation is not appropriate and the College agrees with this decision, the College will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the student will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents and carers will only take place where this would not put the student or others at potential risk of harm. The College will work closely with parents and carers and carers to ensure that the student, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

If the College is dissatisfied, [local escalation procedures](#) will be followed.

31. Concerns about Staff and Safeguarding Practices

If a staff member has concerns about another member of staff (including supply staff, and volunteers), it will be raised with the Headteacher. If the concern is with regards to the Headteacher, it must be referred to the Chair of Governors. Our Chair of Governors is Anne Kelly annergelly@hotmail.com

Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the *Whistleblowing Policy*. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

32. Allegations of Abuse Against Staff and Low-Level Concerns

There are clear policies in line with those from the CSAP (Children's Safeguarding Assurance Partnership) for dealing with allegations against people who work with children. For further information, please see the College's *Allegations Made Against Staff Policy and Procedure*.

All allegations against staff, supply staff, volunteers, contractors and any person who may use the College premises, will be managed in line with the College's *Whistleblowing Policy* and *Allegations Made Against Staff Policy and Procedure*. The College will ensure all allegations against staff, including those who are not employees of the College, are dealt with appropriately and that the College liaises with the relevant parties.

When managing allegations against staff, the College will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns". Allegations that meet the harms threshold include instances where staff have:

- Behaved in a way that has harmed a child or may have harmed a child
- Committed or possibly committed a criminal offence against or related to a child
- Behaved towards a child in a way that indicates they may pose a risk of harm to children
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children

All staff at Unity College are aware of these procedures and aware of the following expectations and protocol:

- **All** staff and volunteers are aware that they must refer allegations or concerns around staff (including supply staff) conduct to the Headteacher
- **All** staff and volunteers are aware of the requirement to, and process of referring allegations or concerns around the Headteacher to the nominated Governor and how to contact them
- The Headteacher and/or Chair of Governors will discuss the allegation with the Local Authority Designated Officer (LADO)
- **CSAP procedures** for dealing with allegations against staff will be followed
- **All** staff and volunteers remember that the welfare of the child is paramount and that they have a duty to inform the headteacher if any adult's conduct gives cause for concern
- **All** staff recognise the importance of sharing and reporting low-level concerns (see below guidance on low-level concerns) surrounding staff or any adult in a position of trust to the Headteacher
- **All** staff are aware of the College's *Whistle Blowing Policy*, which enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place
- Staff are fully aware of the Staff Code of Conduct and are aware of professional expectations of their own behaviour and conduct

Further information, LADO information and flowchart of how allegations are managed:



2021 LADO Flyer
May 2021.doc



Threshold matrix
LADO August 2022 (

Unity College recognises that children may make disclosures against someone who is in a position of trust and/or is working or volunteering with children, not in the College setting. This may be an adult in a place of worship, a sports coach or a club leader. After ensuring that the child is safe, we recognise that we must refer to the LADO and share information.

Low Level Concerns

Unity College ensures that all staff are aware of how to recognise and report **low level concerns** around staff behaviour or conduct.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school or college may have acted in a way that:

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

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to college policy
- engaging with a children a one-to-one basis in a secluded area or behind a closed door, or
- humiliating students

Unity College will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the College (including supply teachers, volunteers, contractors or those that have hired/let the premises) are dealt with promptly and appropriately. Unity College will strive to embed a culture of openness, trust and transparency in which the College's values and expected behaviour set out in the Staff Code of Conduct are lived, monitored and reinforced constantly by all staff.

Unity College will ensure that staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All staff are clear on how to report low-level concerns and will be empowered to do so. Staff must report their concerns to the Headteacher either directly, or via a Low-Level Concern form, that can be found on the staff intranet

If concerns are surrounding the Headteacher, this must be referred to the Chair of Governors. Guidance from [Keeping Children Safe in Education, September 2023](#), will be followed in view of recording and storage of such concerns.

If in doubt whether the concern is a low-level concern, the Headteacher will consult with LADO for guidance.

The governing body will ensure low level concern procedures and staff behaviour expectations are clearly addressed within the staff code of conduct, and procedures are implemented effectively, ensuring that

appropriate action is taken in a timely manner to safeguard children and facilitate a whole college approach to dealing with any concerns.

33. Safer Recruitment

Unity College is committed to keeping pupils safe by ensuring that adults who work or volunteer in college are safe to do so. We therefore ensure that [Keeping Children Safe in Education, September 2023, Part 3](#) guidance is adhered to, to ensure that there is a strong reference and commitment to safeguarding during advertisement, selection and recruitment of new staff.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for teaching, training, instructing or the care or supervision of children.
- Regularly work in the College at times when children are on the premises.
- Regularly come into contact with children under 18 years of age. (*Regular is defined as; at least 3 times in a 30-day period*)

The governing board will conduct the appropriate pre-employment checks for all prospective employees.

The College will ensure that:

- The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors. The DfE's [DBS Workforce Guides](#) will be consulted when determining whether a position fits the child workforce criteria
- The original DBS certificate is seen for all appointees to the College, even where the on-line DBS system indicates that the check is clear
- There are sufficient staff/governors who have undertaken appropriate Safer Recruitment training in the last 5 years and reached the required standard as verified by the course facilitators, to enable at least one person on every recruitment panel to be appropriately trained and there are at least 2 people on each selection panel
- Written assurances will be obtained from agencies and other employers that provide staff to work in college, to confirm that appropriate pre-employment checks have been undertaken in line with [Keeping Children Safe in Education, September 2023](#)
- Individual identity checks will be undertaken on those staff detailed above to ensure they are employees of the named agency/employer
- An online search is conducted as part of our due diligence on shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online and will inform shortlisted candidates of this procedure
- Advice will be sought from Human Resources, LADO and/or Schools Safeguarding Officers if any staff are unclear about any aspects of Safer Recruitment

Referral to the DBS

There is a legal requirement for schools and colleges to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:

- engaged in relevant conduct in relation to children and/or adults, *and/or*
- satisfied the harm test in relation to children and/or vulnerable adults, *and/or*

- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence

Single central record (SCR)

The College keeps an SCR which records all staff, including agency, third-party supply staff and teacher trainees on salaried routes, who work at the school, even if they work for one day.

All members of the governing board are also recorded on the SCR.

The following information is recorded on the SCR:

- an identity check
- a barred list check
- an enhanced DBS check
- a prohibition from teaching check
- a check of professional qualifications, where required
- a check to determine the individual's right to work in the UK
- additional checks for those who have lived or worked outside of the UK
- any other information deemed relevant

If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, (with/without a barred list check, depending on whether they are in regulated activity), the risk assessment will be recorded.

The details of an individual will be removed from the SCR once they no longer work or volunteer at the College.

34. Review

This Policy is subject to ongoing review; however, will be reviewed no later than **September 2024**. All staff have received a copy of this policy.

35. Training Record

Deputy Head Teacher (DSL)	Alison Hodgson	Annual Advanced Certificate in Safeguarding for Designated Safeguarding Leads (2022-23) 2 November 2022 DSL 2 yearly update training 22 February 2023 Annual Certificate in Safer Recruitment for Education Settings (2022-23) 18 February 2023
Lead DSL	Beverley Worthington	Annual Advanced Certificate in Safeguarding for Designated Safeguarding Leads (2022-23) 6 November 2022 DSL 2 yearly update training 22 February 2023 Annual Certificate in Safer Recruitment for Education Settings (2022-23)

		22 April 2023
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Deputy DSL	Shameem Hudson	Annual Advanced Certificate in Safeguarding for Designated Safeguarding Leads (2022-23) 27 November 2022 DSL 2 yearly update training 22 February 2023 Prevent training webinar 12 July 2022
Headteacher	Jane Richardson	Annual Advanced Certificate in Safeguarding for Designated Safeguarding Leads (2022-23) 27 November 2022 DSL 2 yearly update training 22 February 2023 Annual Certificate in Safer Recruitment for Education Settings (2022-23) 15 May 2023
Chair of Governors Safeguarding Governor	Anne Kelly	Annual Certificate in Safeguarding for Governors (2022-23) 20 February 2023 Annual Certificate in Safer Recruitment for Education Settings (2022-23) 3 April 2023
Prevent Lead	Beverley Worthington	Prevent training webinar 12 July 2022 Train the Trainers (Lancashire Prevent Partnership) 4 October 2022

