



SAFEGUARDING POLICY

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1. Introduction and Expectations

- 1.1 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
- 1.2 At the NCS we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment.
Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.
We maintain an attitude of **"it could happen here"**.
- 1.3 The child's wishes and feelings will always be taken into account when determining what action to take and what services to provide. We will always act in the best interest of the child.
- 1.4 The words 'Safeguarding' and 'Child Protection' are often used interchangeably. Safeguarding is what we do for all children, whilst child protection refers to the procedures we use for children at risk of significant harm or who have been harmed.
- 1.5 All staff, Governing Board members, regular volunteers/visitors will:
- Be familiar with this safeguarding policy;
 - Be aware of systems within the Sixth Form which support safeguarding.
 - Have read and will adhere to the Staff Code of Conduct;
 - Be subject to Safer Recruitment processes and checks (appropriate to their role), whether they are new staff, supply staff, contractors, visitors, volunteers etc.
 - Be aware that all children may benefit from **Early Help** but be alert to the potential need for early help of children in certain vulnerable groups (See Section 5.6 and 5.7 for list of vulnerable children)
 - Be alert to signs and indicators of possible abuse (See Annex One for current definitions and indicators);
 - Record concerns and give the record to the Designated Safeguarding Lead – Mrs Olga Markoulides (Assistant Principal), Deputy Designated Safeguarding Leads - Ms Rebecca Pinfield (Assistant Principal).
 - Deal with a disclosure of abuse from a child in line with the guidance in Section 6.
- You must inform the Designated Safeguarding Lead (or deputy) immediately and provide a written account as soon as possible;

Safeguard Training for staff

- 1.6 At induction, staff will receive training on
- the Safeguarding and Child Protection policy (including the policy and procedures to deal with child on child abuse as well as online safety including understanding expectations, roles and responsibilities in relation to filtering and monitoring)
 - the behaviour policy
 - the staff code of conduct
 - the safeguarding response for children who are absent from education
 - the role of the DSL (including the identity of the DSL and deputies)

- 1.7 At induction, staff will also be provided with a copy of Part one of Keeping Children Safe in Education (Sept 2023)
- 1.8 All staff will receive Safeguard training at least once a year.
- 1.9 All staff will read and understand Part One of 'Keeping Children Safe in Education' (Sept 2023) and as a Sixth Form we will provide training to all staff to ensure all the key messages from this document are understood.
- 1.10 All staff will receive safeguarding and child protection updates e.g. staff meetings, e-bulletins and/or emails at frequent intervals (as a minimum every ½ term) to provide them with relevant skills and knowledge to safeguard effectively. Safeguarding is a standing agenda item at SLT meetings.
- 1.11 Key staff will undertake additional safeguarding training commensurate to their position and the DSL (and deputies) will undertake refresher DSL training every 2 years.

2. The Designated Safeguarding Lead (DSL)

Staff with designated responsibilities for Safeguarding

DSL	Deputy-DSL	SPOC	Lead Safeguarding Governor	Chair of Governors
Olga Markoulides omarkoulides@ncs6.org	Rebecca Pinfield rpinfeld@ncs6.org	Olga Markoulides	Martin Gaskell mgaskell8@gmail.com	Simon Beck Simon.beck@lister.newham.sch.uk

NSPCC contact details: 08088005000 help@nspcc.org.uk

Summary of Roles

- 2.1 The DSL is responsible for managing all referrals about students.
- 2.2 In the event of a referral or a concern about a child, the DSL is responsible for gathering all relevant information (but not for conducting formal interviews) before making a decision about any further action, unless it is a case of extreme urgency when the relevant investigative agencies should be informed without delay.
- Information gathering may involve: -
- Listening to the young person
 - Making notes of what has been said
 - Gathering accounts from members of staff that may have been approached by the young person
- 2.3 The DSL will decide what steps should be taken and should advise the Principal.
- 2.4 The DSL will lead regular case monitoring reviews of vulnerable children. These reviews must be evidenced by minutes. In the DSLs absence the DDSL will lead monitoring reviews.
- 2.5 It is important that a child is kept informed at all times about the Sixth Form's actions and procedures for

dealing with child protection concerns and that the Police and/or Social Services may carry out an investigation. The child will be offered support throughout the period of the investigation by the Designated Member of Staff or other identified appropriate person and may be given other information about confidential sources of support.

- 2.6 Child protection information will be dealt with in a confidential manner. Staff will be informed of relevant details only when the DSL (or deputy) feels their having knowledge of a situation will improve their ability to deal with an individual child and/or family. A record will be made on CPOMS of what information has been shared with whom and when.
- 2.7 Parents will be aware of information held on their children and kept up to date regarding any concerns or developments by the appropriate members of staff. General communications with parents will be in line with any home/sixth form policies and give due regard to which adults have parental responsibility. We will not disclose to a parent any information held on a child if this would put the child at risk of harm.
- 2.8 The DSL (or deputy) will liaise with the Virtual School Head Teachers (VSH). The Virtual School Head has the responsibility to promote the educational outcomes for Looked After Children, Previously Looked After Children and children who have a social worker. All local authorities must have a VSH. Olga Markoulides (Assistant Principal and DSL) has responsibility for LAC.
- 2.9 The DSL will raise awareness of safeguarding and child protection amongst staff and parents. This will be done by a variety of methods including but not limited to the student handbook and bulletins sent to parents.

Availability

- 2.10 During term time the DSL (or a deputy) will always be available (during Sixth Form hours) for staff and students in the sixth form to discuss any safeguarding concerns. In exceptional circumstances availability via phone, Microsoft Teams, Skype or other such media is acceptable.
- 2.11 The DSL's email signature will include links to external organisations that students can contact if they are in distress.
- 2.12 Students will be informed and reminded at timely intervals (that staff (including the DSL) will not be available to contact outside of college hours. Students will be given a variety of contact numbers via which they can access support in these circumstances.
Outside of term time, the DSL and deputies will use auto-replies on emails which remind students of these emergency contact numbers.
Other staff will also be encouraged to use auto-replies on their emails outside of term time.
- 2.13 Although students will be able to submit concerns/reports on TootToot on any day and at any time, it will be made clear these reports will only be viewed during college hours.

Handing over to a new post holder

- 2.14 When a DSL resigns their post or no longer has child protection responsibility, there should be a full face to face handover/exchange of information with the new post holder.
- 2.15 In exceptional circumstances, when a face to face handover is unfeasible, the Principal will ensure that the new post holder is fully conversant with all procedures and case files.
- 2.16 **See Annex Seven** for more detailed information on the role of the DSL.

3. The Governing Body

3.1 The Governing Body is the accountable body for ensuring the safety of the Sixth Form. Safeguarding is a standing item on the agenda of all Governing board full meetings.

3.2 The Governing Body must ensure that:

Governor Training

- All governors and trustees receive appropriate safeguarding and child protection (including online) training at induction, so that they have the knowledge to provide strategic challenge to test and assure themselves that safeguarding policies and practices within the college are effective.
- All governors and trustees update their training regularly.
- All governors and trustees read Keeping Children Safe in Education, 2023: Part Two: The Management of Safeguarding

Policies and Procedures

- The Sixth Form has a safeguarding policy and procedures in place in accordance with local authority guidance and locally agreed multiagency procedures, and the policy is made available on our website and updated (as a minimum) annually;
- A staff code of conduct exists and includes, amongst other things: acceptable use of technologies, staff/student relationships and communications including the use of social media, information about staff behaviours that are a low level concern and how to respond.
- A student behaviour policy exists which includes measures to prevent bullying
- Appropriate safeguarding arrangements exist to respond to children who are absent from education, to help identify the risk of abuse and neglect and to help prevent children going missing in the future;
- The Sixth Form remedies any deficiencies or weaknesses brought to its attention without delay;

Safer Recruitment

- The Sixth Form operates “safer recruitment” procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers and this is recorded on the Single Central Register;
- All staff have an Enhanced DBS check and this is recorded on the Single Central Register;
- Restriction information about teachers from the European Economic Area (EEA) has been gathered from the NCTL’s Teacher services and these checks are recorded for staff from these countries
- Temporary staff and volunteers are made aware of the Sixth Form’s arrangements for child protection and their responsibilities;
- All agency staff have vetting checks and have to present ID on their first day in the Sixth Form;
- The Sixth Form has procedures for dealing with safeguarding concerns or allegations against staff/volunteers including a procedure for referring to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.

Staffing and Staff Training

- At least one member of the Senior Leadership Team is appointed to the role of Designated Safeguard Lead (DSL);
- The DSL attends appropriate refresher training every two years;
- All staff undergo safeguarding and child protection training (including online safety and responsibilities in relation to filtering and monitoring) annually as well as regular safeguarding and child protection updates
- The Sixth form contributes to multi-agency working in line with the statutory guidance ‘Working Together to Safeguard Children’

- Relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and UK GDPR (see Paragraphs 115 – 123 KCSIE 2023)

Curriculum

- The Sixth Form has appropriate plans to teach students about relevant and contextual safeguarding related issues as part of the curriculum

Online safety, Filtering and Monitoring (KCSIE 2023, Para 138, 141-143, 145-147)

(more details of this can be found in the NCS e-Safety policy)

- Online safety is a running and interrelated theme within the relevant Sixth Form Policies, curriculum and staff training
- Policies about online safety are based on the 4Cs (Content, Contact, Conduct and Commerce) and include acknowledgement that students have access to the internet via their own mobile phones while on Sixth Form premises
- The Sixth Form is doing all it reasonably can to limit students' exposure to risks via the Sixth Form's IT system (including blocking harmful and inappropriate content without unreasonably impacting teaching and learning)
- There are appropriate filtering and monitoring systems in place, which are reviewed regularly (at least annually) and are in line with the DfE Filtering and Monitoring standards
- There are assigned Roles and responsibilities in relation to filtering and monitoring
- There are effective monitoring strategies in place
- A member of the governing body reviews the DfE Filtering and Monitoring standards and discusses with IT staff and service providers what (if anything) needs to be done to support the NCS in meeting these standards
- The Sixth Form carries out an annual review of the approach to online safety including a risk assessment

3.3 The Governing Body reviews its policies/procedures annually.

3.4 The Nominated Governor for safeguarding at the college is **Mr Martin Gaskell** . The Nominated Governor is responsible for liaising with the Principal and Designated Safeguarding Lead(s) over all matters regarding safeguarding and child protection issues. The role is strategic rather than operational – they will not be involved in concerns about individual students. The safeguarding governor will follow the CoLAT best practice advice to guide them in their role.

3.5 The Nominated Governor will liaise with the Principal and the DSL to produce an annual report for governors and the local authority. The DSL will provide termly updates to the safeguarding governor using the CoLAT Safeguarding monitoring form.

3.6 The Governing Body should ensure there are procedures in place to manage any safeguarding concerns or allegations about staff members. A member of the Governing Body (usually the Chair) is nominated to be responsible for liaising with the local authority and other partner agencies in the event of allegations of abuse being made against the Principal.

4. A Safer College Culture

Safer Recruitment Summary

- 4.1 Full details about the NCS safer recruitment policies can be found in Annex Four.
- 4.2 The Sixth Form pays full regard to 'Keeping Children Safe in Education' (2022) and the CoLAT Safer Recruitment and Selection Policy and Procedure.
- 4.3 Members of the Leadership Team have undertaken Safer Recruitment training. At least one member of SLT will be involved in all staff/volunteer recruitment processes and sit on the recruitment panel.
- 4.4 Volunteers who engage in a 'regulated' activity and work with students without supervision are required to undertake an Enhanced DBS check in advance of the role. These volunteers to the NCS will also complete Safeguard training delivered by the DSL or deputy DSL. If the volunteer is not engaged in 'regulated' activity, a risk assessment should be undertaken.
- 4.5 The NCS will ensure that any contractor, or any employee of the contractor, who is to work at the college has been subject to the appropriate level of DBS check and upon arrival photo identification is checked.
- 4.6 Any staff who are employed centrally by City of London Academies Trust (COLAT) are adequately vetted according to Safer Recruitment in the Education guidance and confirmation is kept in the Single Central Register. (SCR).

Single Central Register

- 4.7 The single central register includes all staff, including teacher trainees on salaried routes
- 4.8 Where an employment business supplies a member of staff, the single central register will record whether written confirmation has been received that the business has carried out relevant checks and obtained appropriate certificates, the date the confirmation was received and whether details of any enhanced DBS certificate have been provided.
- 4.9 The single central register will confirm whether the following checks have been carried out or certificates obtained and the date on which each check was completed or certificate obtained
- an identity check;
 - a barred list check;
 - an enhanced DBS check requested/certificate provided;
 - a prohibition from teaching check;
 - further checks on people who have lived or worked outside the UK
 - a check of professional qualifications, where required; and
 - a check to establish the person's right to work in the United Kingdom.
 - Whether the person's position involves 'relevant activity'
 - Details of Section 128 check for those in management positions
 - Any other checks as may be required from time to time.
- 4.10 The details of individuals who no longer work at the NCS will be moved to the 'Leavers' tab on the Single Central Register.

5. Prevention of Abuse

- 5.1 Children must know how to recognise when they are at risk and how to get help when needed. We will provide opportunities through the curriculum for students to develop skills, concepts, attitudes and knowledge that promote their safety and well-being.

The Curriculum and Contextual Safeguarding

- 5.2 The college is aware children can be at risk of harm, abuse or exploitation at college, within their families as well as outside their families (i.e. extra-familial harms). The curriculum will consider the risks that could be present in children's families or extra-familial situations that are a threat to their safety and/or welfare.
- 5.3 Young people will be taught about safeguarding through a broad and balanced curriculum. Relevant issues will be addressed through the PSHE curriculum and the tutorial programme; for example, Sex and Relationship Education (SRE), Sexual violence and harassment, FGM, Online safety, bullying (including cyber bullying), body confidence and self-esteem, Forced marriage, Sharing of nudes and semi-nudes, Domestic abuse (including in their own intimate relationships), 'upskirting', radicalisation and extremism, and gangs, knife crime and county lines.

Other areas of work

- 5.4 All our policies which address issues of power and potential harm, for example, anti-bullying, equal opportunities and behaviour will be linked to ensure a whole college approach.
- 5.5 Our safeguarding policy cannot be separated from the general ethos of the Sixth Form, which should ensure that students are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice and are listened to.

Early Help

- 5.6 Keeping Children Safe in Education (2023) emphasises Early Help and the needs of staff to be able to identify students who need this level of support. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.
- 5.7 Any child may benefit from early help but staff will be particularly alert to the potential need for early help by the following groups of students who have been identified by KCSIE, Sept 2023
- is disabled or has certain health conditions and has specific additional needs;
 - has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
 - has a mental health need;
 - is a young carer;
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
 - is frequently missing/goes missing from care or from home;
 - is at risk of modern slavery, trafficking, sexual or criminal exploitation;
 - is at risk of being radicalised or exploited;
 - has a family member in prison, or is affected by parental offending;
 - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
 - is misusing alcohol or other drugs themselves;
 - has returned home to their family from care;

- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

Involving Parents/Carers

5.8 In general, we will discuss any child protection concerns with parents/carers before approaching other agencies and will seek their consent to make a referral to another agency. Appropriate staff will approach parents/carers after consultation with the Designated Safeguarding Lead. However, there may be occasions when the college will contact another agency before informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child.

5.9 Parents/carers will be informed about our safeguarding policy through our website.

6. Responding to a disclosure

- 6.1 Staff should be aware that students might make a disclosure to them. Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Disclosures can be about events of varying levels of severity.
- 6.2 If a member of staff does not feel comfortable receiving a disclosure they should refer the student to the DSL. The student should not be left on his/her own until the member of staff has handed over to the DSL.
- 6.3 Note: It is not staff's role to seek disclosures. Your role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.
- 6.4 Staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.
- 6.5 Staff should be aware that children very rarely lie about abuse; but they may have tried to tell others and not been heard or believed.
- 6.6 All staff should be aware that children might display behaviours which are indicators of abuse before the child makes a disclosure. Any such indicators should be referred to the DSL via CPOMS. Staff should also be aware that indicators in our students might be subtle, since students are older and might be used to hiding their feelings and experiences. Therefore, staff should know that they must be more sensitive to less obvious indicators, for example students who
 - Are often tired
 - hand in poor quality home learning or miss deadlines
 - seem unusually quiet
 - display changes in mood

Receiving a Disclosure

- 6.7 If a member of staff receives a disclosure they should take into account the following guidelines
- Stay calm and do not communicate shock, anger, discomfort or embarrassment.
 - Reassure the student and take them seriously. Tell them you are pleased that they are speaking to you and communicate that they have the right to be safe and protected.
 - Ensure that the young person does not feel ashamed or feel they are creating a problem by making a report
 - Do not promise confidentiality as any safeguarding concern must be shared with the designated safeguard lead (or deputy). Assure the student that you will try to help but let them know that you will have to tell other people in order to do this. State who this will be and why.
 - Do not promise that parents will not be informed (even if the student specifically requests this)
 - Listen carefully to the young person and tell the young person that you believe them.
 - Encourage the young person to talk but do not ask “leading questions”. It is fine to ask open questions for clarification such as: where?, when?, what? Etc.
 - Check that you have understood correctly what the young person is trying to tell you.
 - Do not make inappropriate comments about the alleged offender.
 - Keep the young person with you until you can hand them over to another member of staff. The key is to make sure that they are supervised, either by them being in a lesson or taking them to the DSL (or deputy).

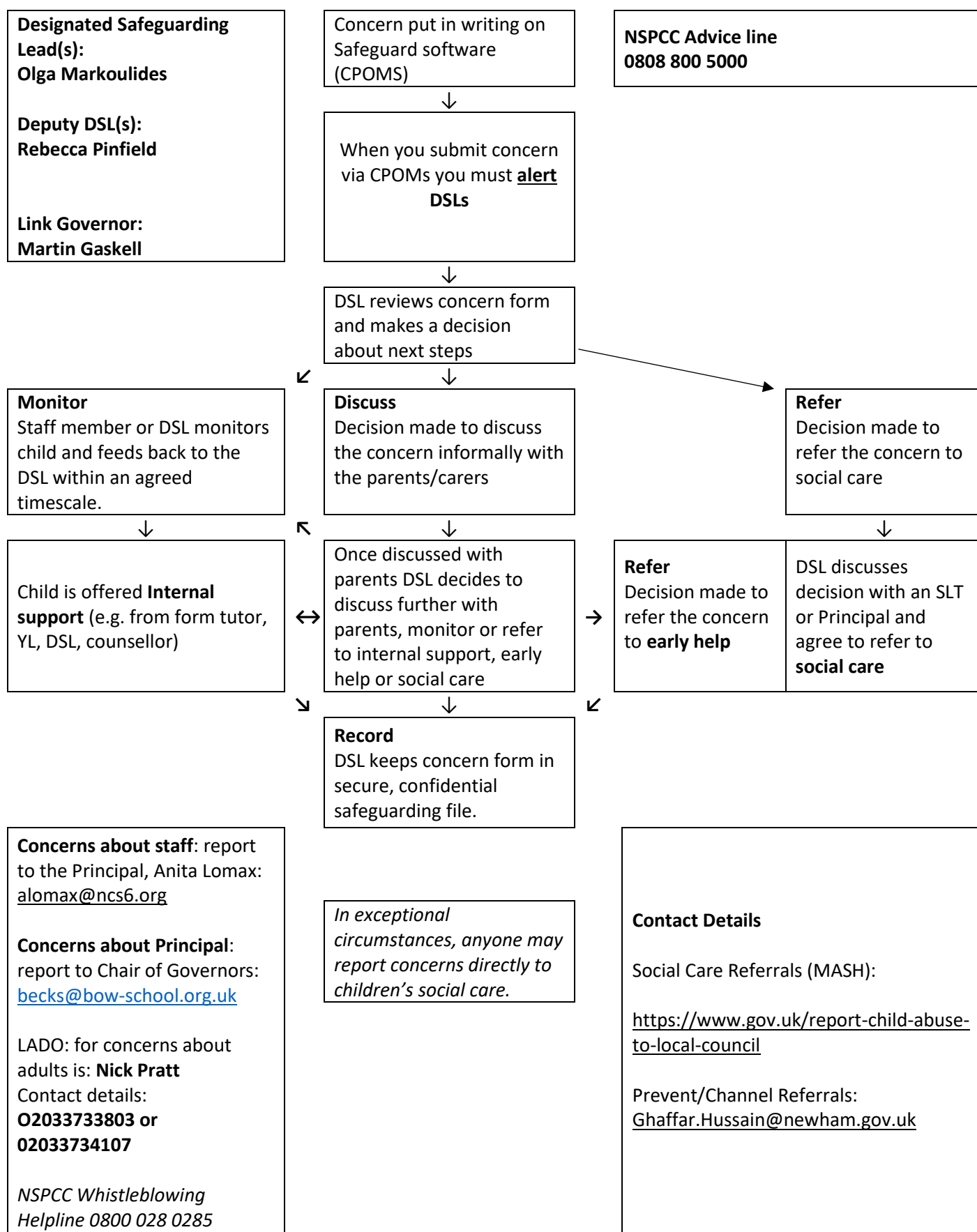
Recording the disclosure

- 6.8
- Make a detailed record of the conversation (on CPOMS) using the young person’s own language. Include any questions you may have asked. Do not add any opinions or interpretations.
 - Be aware that the young person may retract what they have told you. It is essential to record everything that was said to you.

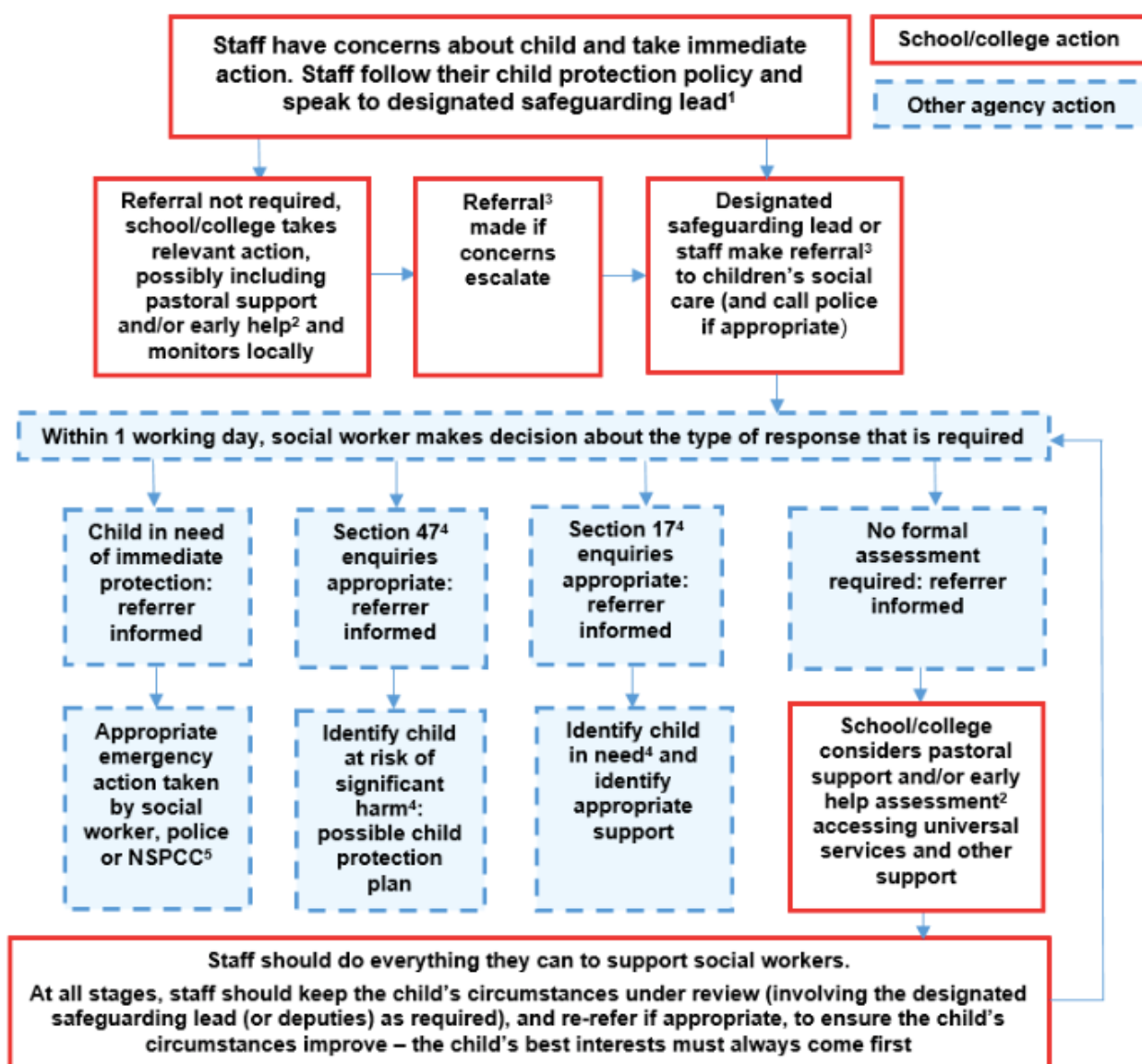
Reporting the disclosure

- 6.9
- If you are concerned about the safety of the child, you must also verbally inform the DSL (or deputy) as soon as practically possible. Do not go home without passing on the information.
 - Do not let the child go home if they are at risk.
- 6.10 Out of hours and/or if DSL/SLT are not available
- Contact the police if you are concerned about the imminent safety of a child
 - Contact Children’s social care if there is not an imminent risk (contact details on flow chart below)

Flow chart for raising safeguarding concerns about a child



The flow chart below summarises what happens when the DSL makes a report:



7. Supporting Staff and DSLs

- 7.1 We recognise the stressful and traumatic nature of child protection work.
- 7.2 We will support staff by providing an opportunity to talk to the Designated Safeguarding Lead who will refer to further support as appropriate.
- 7.3 The DSL and Deputy DSLs will meet regularly to discuss cases and review decisions together so that the weight of a case never sits on just one person. Additionally, DSLs will be offered support e.g. from the NCS counsellor, psychotherapist, Safeguarding Supervision (from supervisioninschool.co.uk) or other external agencies where necessary.

8. Confidentiality

- 8.1 We recognise that all matters relating to child protection are confidential.
- 8.2 Staff have a professional responsibility to share relevant information about the protection of children with other professionals, particularly investigative agencies. If a child or young person confides in a member of staff and requests that the information remains “secret”, it is important that the member of staff tells the child/young person sensitively that s/he has a responsibility to refer cases to the appropriate agencies in order that they and potentially other children may be safeguarded.
- 8.3 The child/young person should, however, be assured that the matter will be disclosed only to people who **“need to know”** about it. Staff who receive information about children and their families should share that information **only** within appropriate professional contexts.
- 8.4 Informing parents:
- We will aim to share our intentions to refer a young person to social services with their parent/carers unless to do so could put the young people at greater risk of harm or impede a criminal investigation. Staff should not promise that parents will not be informed, even if the child makes this request. The DSL will consider (often in consultation with MASH and/or Safeguarding Supervision) as to whether or not parents should be informed.
- 8.5 The Data Protection Act 2018 and General Data Protection Regulations (GDPR) do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. This includes the need to share information without consent e.g. if we cannot gain the consent of the child.

9. Multi-Agency Work

- 9.1 The Sixth Form will work in partnership with parents/carers, social care, the police and health services to promote the welfare of children and protect them from harm.
- 9.2 Where a referral needs to be made to social care, the following website can be used to find the contact details of the relevant borough:
- <https://www.gov.uk/report-child-abuse-to-local-council>
- 9.3 Referrals should be made by the DSL (deputies or relevant year leader with support from the DSL) to the Multi-Agency Safeguarding Hub (MASH). Where the child already has a safeguarding social worker, the request for service should go immediately to the social worker involved or, in their absence, to their team manager.
- 9.4 We will co-operate with any child protection enquiries conducted by children’s social care: the Sixth Form will ensure representation at appropriate inter-agency meetings such as integrated support plan meetings, initial and review child protection conferences and core group meetings. We will provide reports as required for these meetings. If the DSL (or deputy) is unable to attend, a written report will be sent.
- 9.5 Where a student is subject to an inter-agency child protection plan or a multi-agency risk assessment conference (MARAC) meeting, the sixth form will contribute to the preparation, implementation and review of the plan as appropriate.

Working with the Police

- 9.6 When there is a concern that a child has broken the law, the DSL and Principal will consider calling the police, using the guidance in 'NSPCC – When to call the police'. The DSL and Principal will reflect upon the proportionality of this response, being aware of the child's rights under the Equalities Act and Human Rights Act and if necessary, identifying and addressing concerns such as adultification if it is suspected of being present in staff decision making processes thus far. Where possible, the college will contact the Safer Schools Officer before contacting police directly, unless the risk is considered to be escalating at a rate that precludes contacting the SSO. The SSO is Gareth Davies: gareth.davies6@met.police.uk, 02082175706.
- 9.7 PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child. PACE also states that if at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.
- 9.8 The DSL (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a student about an offence they may suspect. The communication will be recorded on CPOMS.
- 9.9 If having been informed of the vulnerabilities, the DSL (or deputy) does not feel that the officer is acting in accordance with PACE, they will ask to speak with a supervisor or contact 101 to escalate their concerns.
- 9.10 As per statutory guidance (<https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible>) an Appropriate adult for a juvenile can be:
- (i) the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation unless they are
 - suspected of involvement in the offence;
 - the victim;
 - a witness;
 - involved in the investigation
 - received admissions prior to attending to act as the appropriate adult.
- Note: If a juvenile's parent is estranged from the juvenile, they should not be asked to act as the appropriate adult if the juvenile expressly and specifically objects to their presence.
- (ii) a social worker of a local authority
- However, If a juvenile admits an offence to, or in the presence of, a social worker or member of a youth offending team other than during the time that person is acting as the juvenile's appropriate adult, another appropriate adult should be appointed in the interest of fairness.
- (iii) failing these, some other responsible adult aged 18 or over who is not:
 - a police officer;
 - employed by the police;
 - under the direction or control of the chief officer of a police force; or

- a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions, whether or not they are on duty at the time.

- 9.11 The NCS will aim to have at least one member of staff who is trained as an Appropriate Adult by the end of the academic year 2023-24.
- 9.12 The college will usually inform parents prior to contacting the police (unless this increases the risk to the child, to other children or other members of the college community).
- 9.13 In the event that a child is interviewed on site by police, the interview will not take place until parents/carers arrive or if this is not possible then the interview will only take place with an Appropriate Adult present.
- 9.14 The Appropriate Adult will act in loco parentis at the interview to provide support to the child prior to parents/carers arriving.
- 9.15 An Appropriate Adult must be present if the child is subsequently arrested and/or taken to a police station and the DSL will ensure that arrangements for such support are in place before the child leaves the school premises, with the reason for the arrest and the name of the appropriate adult concerned, confirmed.
- 9.16 More information about the role of the appropriate adult can be found here: <https://yjlc.uk/resources/legal-terms-z/appropriate-adult>
- 9.17 No child / student may be subject to a search by police on college premises. Any such search should be carried out at the police station with an Appropriate Adult in attendance to the search.

10. Our Role in Supporting Known Vulnerable Children

- 10.1 At the NCS we recognise that children who have a social worker (Child In Need & Child Protection Plans) may have experienced adversity and trauma that leaves them vulnerable to further harm, experience educational barriers to learning, barriers to attendance, as well as behaviour and mental health issues. The DSL will monitor the welfare and academic progress of these children and take appropriate actions to promote the best educational outcomes. The attendance officer will prioritise monitoring the attendance of these children and the DSL will inform the social worker of any absences from the college on the first day of the absence.
- 10.2 An individual support plan (academic and pastoral) will be devised, implemented and reviewed regularly for these children. This plan will detail areas of support, who will be involved, and the child's wishes and feelings. A written outline of the individual support plan will be kept in the child's records.
- 10.3 Children and young people who abuse others will be responded to in a way that meets their needs as well as protecting others within the school community through a multi-agency risk assessment. We will ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims.

- 10.4 Where there is a safeguarding concern, the Governing Body and the college will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. All systems and processes will operate in the best interests of the child.
- 10.5 We will ensure that looked after children and previously looked after children will be given the pastoral and academic support, they need to improve their educational outcomes.
- 10.6 When the college is considering excluding, either fixed term or permanently, a vulnerable student and/or a student who is the subject of a child protection plan or where there is an existing child protection file, we will call a multi-agency risk-assessment meeting prior to making the decision to exclude. In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment *must* be completed prior to convening a meeting of the Governing Body.

11. Looked After Children and Previously Looked After Children

- 11.1 The NCS will ensure that appropriate staff will have the information they need in relation to a child's looked after status (whether they are looked after under voluntary arrangements with the consent of parents or an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. Appropriate staff will also have information about the child's care arrangements and the levels of authority delegated to the care by the authority looking after the child. The DSL will have contact details of the child's social worker and the name of the virtual school head in the authority that looks after the child.
- 11.2 A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, the NCS will work together with other agencies and ensure prompt action is taken when necessary to safeguard these children. The designated teacher for Looked After Children and previously looked after children is Olga Markoulides, Assistant Principal and DSL.

12. Private fostering

- 12.1 A private fostering arrangement is one that is made privately (without the involvement of the local authority) for the care of a child under the age of 16 years, (under 18 years if disabled) by someone other than a parent or a close relative, in their own home with the intention that it should last for 28 days or more.
- 12.2 A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.
- 12.3 Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence. There is no legal

requirement for the college to be informed, but it should be clear to the NCS who has parental responsibility.

- 12.4 Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.
- 12.5 The NCS has a duty to report to the local authority where we are aware or suspect that a child is subject to a private fostering arrangement. The local authority needs to be satisfied that the placement is suitable, and the child is safe.

13. Students with special educational needs

- 13.1 To be read in conjunction with the NCS SEND policy
- 13.2 The NCS recognises that additional barriers can exist when recognising abuse and neglect in this group. These include
- assumption that indicators of abuse or neglect relate to the child's condition without further exploration;
 - these children may be more prone to bullying and peer group isolation;
 - the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
 - communication barriers and difficulties in managing or reporting these challenges
- 13.3 Where appropriate, children with SEND will be offered additional pastoral support and can be referred to IAS for external support and advice ([Find your local IAS service \(councilfordisabledchildren.org.uk\)](http://councilfordisabledchildren.org.uk))
- 13.4 The NCS has appointed Matthew Squire, Deputy Principal as teacher designated with SEND responsibilities.

14. Online safety

- 14.1 To be read in conjunction with the NCS E-safety policy

Online Risks

- 14.2 We recognise that there are four main areas of risk with regards to online safety.
- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
 - conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
 - commerce – risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group
- 14.3 We are aware of the Cyber security standards for schools and colleges and we work with our IT provider to ensure that we do our best to meet these standards.

Minimising Risk and protecting students

- 14.4 We have a filtering system which limits access to certain websites while using the iPads that students are provided with. This system is active both when students are in college and while at home.
- 14.5 We recognise that students have unlimited and unrestricted access to the internet via their own personal devices. This means that some students might share harmful or explicit content or behave in an abusive way to others while in college and at home. Thus we educate our students about the areas of risk at various points across the curriculum and this also includes how students can seek help if they require it.

15. Safeguarding Students Who Are Susceptible to Extremis Ideology and Radicalisation

- 15.1 Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.
- 15.2 The Sixth Form values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society’s values. Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.
- 15.3 The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. The NCS is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.
- 15.4 The NCS seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo Nazi/White

Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

- 15.5 Any prejudice, discrimination or extremist views, including derogatory language, displayed by students or staff will always be challenged and where appropriate dealt with in line with our Behaviour Policy for students and the Code of Conduct for staff. Where misconduct by a teacher is proven the matter will be referred to the National College for Teaching and Leadership for their consideration as to whether to a Prohibition Order is warranted.

Definitions

- 15.6 **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
(page 149 KCSIE, 2023)
- 15.7 **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
(page 149 KCSIE, 2023)
- 15.8 **Extremism** is defined by the Government in the Prevent Strategy as:
“Vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces”.
(page 149 KCSIE, 2023)
- 15.9 **Extremism** is defined by the Crown Prosecution Service as:
- The demonstration of unacceptable behaviour by using any means or medium to express views which:
- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
 - Seek to provoke others to terrorist acts;
 - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
 - Foster hatred which might lead to inter-community violence in the UK.

Risk assessment

- 15.10 The Sixth Form governors, the Principal and the DSL will assess the level of risk within the Sixth Form and put actions in place to reduce that risk. Risk assessment may include consideration of the curriculum, staff training, assembly policy, use of external speakers, integration of students by SEN, anti-bullying policy and other issues specific to the school’s profile, community and philosophy.
- 15.11 This risk assessment will be reviewed as part of the annual return that is monitored by the local authority and the local safeguarding children board.

Risk Reduction through Recognition

- 15.12 Staff should be aware of the risk factors which can lead to the development of extremist ideologies.
- 15.13 Students may become susceptible to radicalisation through a range of social, personal and environmental factors – it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities.
- 15.14 Indicators of vulnerability include:
- Aspirations – the student may have perceptions of injustice; a feeling of failure; rejection of civic life;
 - Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration;
 - Special Educational Need – students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others;
- However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.
- 15.15 As referenced in KCSIE (pg. 150 2023), according to the ‘Managing risk of radicalisation in your educational setting’ (Oct 22) there are four levels of risk: Low risk, At risk, Medium risk and High risk. For a child that is Low or At risk a referral to prevent should be considered. For Medium risk a referral to Prevent will be made and if High risk a referral to the police will be made.

Low Risk: means there’s no evidence to suggest the child, young person or adult learner is vulnerable to radicalisation. Low risk behaviours, when seen alone, would not necessarily need to be explored further.

Low risk behaviours include:

- holding strong opinions or values (non-violent or non-extremist)
- criticising government policies
- adopting visible signs, for example wearing clothing (non-violent or non-extremist), to express identity or sense of belonging
- being active on social media
- taking a keen interest in national and international affairs
- taking a stand and supporting causes, for example animal rights (non-violent)
- showing new interest in a political ideology or religion
- holding or expressing conservative values or practices, whether traditional, cultural or religious (unless they cause harm to a child or others, for example female genital mutilation)

At risk: A child, young person or adult learner at risk may be showing behaviours that could increase their risk and vulnerability to radicalisation.

At risk behaviour includes:

- being drawn to conspiracy theories
- beginning to isolate themselves from family and friends
- viewing or engaging with inappropriate online content and having uncontrolled or unsupervised access to the internet
- expressing concerns about being victimised, for example feeling under attack

- discriminating against other individuals or groups of people
- a sudden change in behaviour
- showing interest in extremists or extreme groups
- expressing views that divide us, for example talking about 'us' and 'them'

Medium risk: means a child, young person or adult learner is at heightened risk of radicalisation.

Medium risk behaviour includes:

- legitimising the use of violence to defend ideology or cause
- accessing extremist or terrorist websites, forums and publications
- expressing dehumanising views
- expressing an interest to travel to a conflict zone
- being in contact with a group or individuals known to support a violent extremist ideology, either online or in real life
- expressing persistent intolerance towards groups of people perceived as 'other' - this may be based on protected characteristics such as gender, religion or ethnicity, but not exclusively
- demonstrating a fixation with weaponry or explosives (this may include posing in concerning photographs or videos with weaponry), without an otherwise reasonable explanation
- being obsessed with massacre, or extreme or mass violence, without targeting a particular group (for example, high school shootings)

High risk: means a child, young person or adult learner is at significant risk. There's evidence that they're currently exposed to terrorist or extremist activity and there's a significant risk to their safety.

High risk, criminal behaviour includes:

- verbally or physically attacking someone due to their race, religion, sexuality and so on
- committing violent acts guided by a violent extremist ideology or group
- taking part in any proscribed violent extremist group (financing, sharing material online, recruiting others and so on)
- having a 'kill list' or detailed plan to carry out mass violence
- producing or sharing terrorist material offline or online
- recruiting others to a proscribed terrorist group or organisation

Risk reduction through Teaching Approaches

- 15.16 We will all strive to eradicate the myths and assumptions that can lead to some young people becoming alienated and disempowered, especially where the narrow approaches young people may experience elsewhere may make it harder for them to challenge or question these radical influences. At the NCS this will be achieved by outstanding teaching; and by adopting the methods outlined in the Government's guidance 'Teaching approaches that help build resilience to extremism among young people' DfE 2011.
- 15.17 We will ensure that all of our teaching approaches help our students build resilience to extremism and give students a positive sense of identity through the development of critical thinking skills. We will ensure that all of our staff are equipped to recognise extremism and are skilled and confident enough to challenge it.

- 15.18 We will be flexible enough to adapt our teaching approaches, as appropriate, so as to address specific issues so as to become even more relevant to the current issues of extremism and radicalisation.
- 15.19 At the NCS we will promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. We will teach and encourage students to respect one another and to respect and tolerate difference, especially those of a different faith or no faith. It is indeed our most fundamental responsibility to keep our students safe and prepare them for life in modern multi-cultural Britain and globally.
- 15.20 The NCS will work closely with Newham Resilience Team to inform and educate our students about issues surrounding extremism and radicalisation.

Response to Concerns

- 15.21 Our Sixth Form is required to identify a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism. The SPOC for the NCS will be **Olga Markoulides, Assistant Principal**. The nominated governor for Prevent is **Martin Gaskell**. (The responsibilities of the SPOC are described below).
- 15.22 When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC/DSL.
- 15.23 Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.
- 15.24 Where risk factors are present but there is no evidence of a particular risk, our DSL/SPOC advises us on preventative work that can be done within school to engage the student into mainstream activities and social groups. The DSL may well be the person who talks to and has conversations with the student's family, sharing the college's concern about the young person's vulnerability and how the family and school can work together to reduce the risk.
- 15.25 In this situation, depending on how worried we are and what we agree with the parent and the young person (as far as possible) –
- The DSL/SPOC can decide to notify the Multi-Agency Safeguarding Hub (MASH) of the decision so that a strategic overview can be maintained, and any themes or common factors can be recognised; and
 - The Sixth Form will review the situation after taking appropriate action to address the concerns.

- 15.26 The DSL/SPOC will also offer and seek advice about undertaking an early help assessment such as the family Common Assessment Framework (CAF) and/or making a referral to children's social care. The local family support and safeguarding hub can assist us.
- 15.27 If the concerns about the student/student are significant and meet the additional needs/complex need criteria, they will be referred to the MASH. This includes concerns about a child/young person who is affected by the behaviour of a parent or other adult in their household.

Roles and Responsibilities of the Single Point of Contact (SPOC)

- 15.28 The SPOC for the NCS is **Olga Markoulides** who is responsible for:
- ensuring that staff of the college are aware that you are the SPOC in relation to protecting students from radicalisation and involvement in terrorism;
 - Maintaining and applying a good understanding of the relevant guidance in relation to preventing students from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;
 - Raising awareness about the role and responsibilities of the NCS in relation to protecting students/students from radicalisation and involvement in terrorism;
 - Monitoring the effect in practice of the college's curriculum and assembly policy to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs;
 - Raising awareness within the college about the safeguarding processes relating to protecting students/students from radicalisation and involvement in terrorism;
 - Acting as the first point of contact within the college for case discussions relating to students who may be at risk of radicalisation or involved in terrorism;
 - Collating relevant information in relation to referrals of vulnerable students into the Channel* process;
 - attending Channel* meetings as necessary and carrying out any actions as agreed;
 - Reporting progress on actions to the Channel* Co-ordinator; and
 - Sharing any relevant additional information in a timely manner.

* Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity and aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

Use of External Agencies/Speakers

- 15.29 At the NCS we encourage the use of external agencies or speakers to enrich the experiences of our students, however we will positively vet those external agencies, individuals or speakers who we engage to provide such learning opportunities or experiences for our students.
- 15.30 These external agencies will be vetted to ensure that we do not use agencies that contradict each other with their messages or that are inconsistent with or are in opposition to Sixth Form values and ethos. The Principal will assess the suitability and effectiveness of input from external agencies or individuals to ensure that:

- Any messages communicated to students are consistent with the ethos of the NCS and do not marginalise any communities, groups or individuals;
- Any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise students through extreme or narrow views of faith, religion or culture or other ideologies;
- Activities are properly embedded in the curriculum and clearly mapped to schemes of work to avoid contradictory messages or duplication;
- Activities are matched to the needs of students;
- Activities are carefully evaluated by the NCS to ensure that they are effective.

15.31 We recognise, however, that the ethos of the NCS Sixth Form is to encourage students to understand opposing views and ideologies, appropriate to their age, understanding and abilities, and to be able to actively engage with them in informed debate, and we may use external agencies or speakers to facilitate and support this.

15.32 Therefore by delivering a broad and balanced curriculum and enrichment programme augmented by the use of external sources where appropriate, we will strive to ensure our students recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability but also to help students develop the critical thinking skills needed to engage in informed debate.

Charity Fund Raising

15.33 The NCS will only ever support charities that are registered with the charity commission and have a designated charity number. Where students or staff want to raise money for a charity that has not been previously vetted, the designated safeguarding lead will liaise with the lead contact for Prevent in the Borough to ascertain whether the charity has any links to extremist ideologies or employ personnel that are known to the authorities for holding extremist views. No fundraising for any charity will be permitted unless first authorised by the Principal and in her absence the Vice Principal.

16. Specific Safeguarding Issues and 'at risk' groups.

16.1 Through the Sixth Form's values, ethos and behaviour policies, our safeguarding policy provides the basic platform to ensure children and young people are given the support to respect themselves and others, stand up for themselves and protect each other.

16.2 Our college keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation.

16.3 Our staff are supported to recognise warning signs and symptoms in relation to specific issues and to include such issues in an age appropriate way in their curriculum.

16.4 Our Designated Safeguarding Lead knows where to seek and get advice as necessary.

16.5 Our sixth form brings in experts and uses specialist material to support the work we do.

- 16.6 All staff are aware that children can be at risk of abuse or exploitation in situations outside their families.
- 16.7 All staff should have an awareness that certain behaviours and safeguarding issues can put children at risk of harm.
- (i) Behaviours linked to drug taking or alcohol misuse
 - (ii) Homelessness
 - (iii) Deliberately missing education
 - (iv) Mental Health
 - (v) So-called Honour based abuse (including FGM and forced marriage)
 - (vi) Child criminal exploitation and child sexual exploitation
 - (vii) County lines
 - (viii) Serious violence
 - (ix) Child on child abuse
 - (x) Sexual violence or harassment
 - (xi) Consensual and non-consensual sharing of nudes and semi-nude images and/or videos
 - (xii) Domestic abuse

Details of these issues and how to respond are below.

(ii) Homelessness

Being homeless/or at risk of homelessness presents a risk to a child's welfare. The DSL (and deputies) is aware of the contact details and routes in to the Local Housing Authority and will raise/progress concerns at the earliest opportunity. The DSL will also make a referral into children's social care where a child has been harmed or is at risk of harm.

(iii) Children who are Absent from Education (CAE)

All staff should be aware that children who are absent from education, particularly repeatedly or for prolonged occasions, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing or becoming missing from education in future.

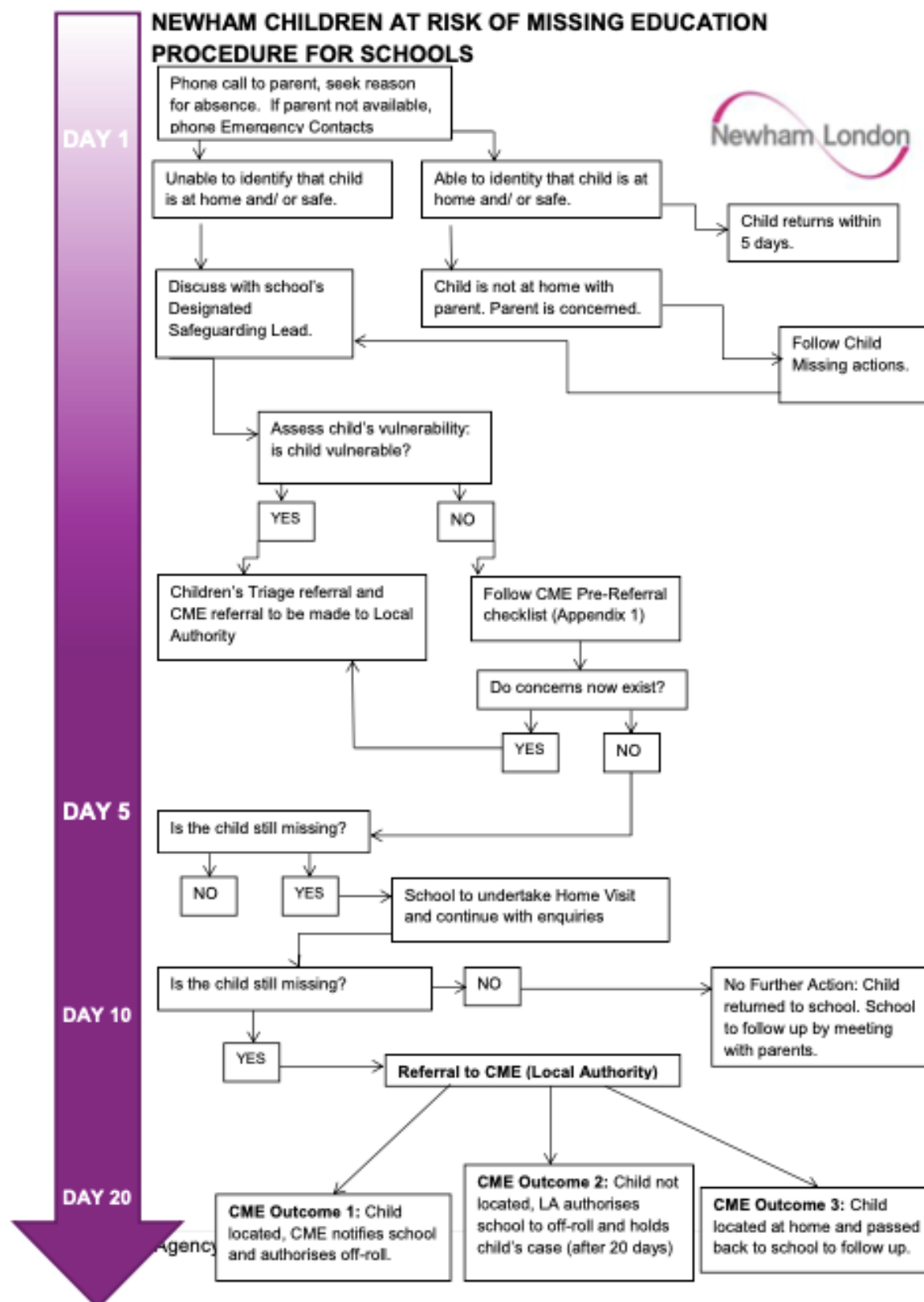
Safeguarding Information: Children who are Absent from Education.

The Sixth Form's approach to CAE is part of our broader approach to safeguarding and we operate the following procedures to safeguard against CAE, in line with the local authority

- The flow chart below summarises the local authority Children Missing Education procedures which we follow if a child was missing from education.
- The sixth form will ensure that we have at minimum of two emergency contact numbers for each child;
- The admission register will be accurate and up to date. The sixth form will ask parents to inform the college of any changes to their information, to help the college and the LA when making enquiries about missing children. When a parent notifies the sixth form that a student will live at another address, we will record the following in the admission register: the full name of the parent with whom the child will live, the new address and the date from when it is expected the child will live at this address.

- The sixth form will enter students on the admission register at the beginning of the first day on which it has been agreed by the sixth form or the date that the sixth form has been notified, that the student will attend the sixth form.
- If a parent notifies the college that a student is registered at another school or will be attending another school in future, the college must record the following information in the admission register: the name of the new school; the date when the student first attended or is due to start attending that school. The college will ensure any safeguarding information is transferred to the new school in a confidential and secure manner.
- If we are concerned that the child is at risk, the college will inform the local authority when a child leaves the NCS
- The college will monitor students' attendance through daily registers. Parents/carers are required to inform the Sixth Form every morning that a child is absent (either email ncs-attendancereporting@ncs6.org or phone). The attendance officer will attempt to make contact with home on each day a child is absent to ascertain a reason. The college has a 'priority register' which lists vulnerable students whose attendance will be monitored as a priority.
- The college will address poor or irregular attendance through 1-2-1 meetings with students as well as phone calls, letters and meetings with parents/carers, this gives the opportunity for identification of safeguarding issues which might be contributing to poor attendance and punctuality. Details of the punctuality and attendance procedure can be found in the attendance policy.
- The Principal and Vice Principal will conduct a home visit for students where there has been an unexplained absence for 5 days.
- The Sixth Form will report to the LA, any student who has been missing from college for 5 days without permission.
- Where a student has not returned to the sixth form for 10 days after an authorised absence or is absent without authorisation for twenty consecutive days, the sixth form will remove the student from the admission register if the academy and LA have failed to establish the whereabouts of the child after making reasonable enquires.
- Students who remain on the sixth form roll are not necessarily missing from education but will be monitored and attendance will be addressed when it is poor.
- At the start of any academic year the admission register can be inaccurate as students may enrol at a number of colleges at one time. The college will contact all students who have initially enrolled at the NCS and subsequently don't attend to ascertain where they are being educated. After 3 weeks, the college will inform the LA of any student we have been unable to ascertain where they have enrolled and will remove them from the NCS admission register.
- Referrals about children missing in education will be made here: <http://www.newham.gov.uk/schoolcme>
-

NEWHAM CHILDREN AT RISK OF MISSING EDUCATION PROCEDURE FOR SCHOOLS



More information and guidance about the protocol in Newham can be found here:

<https://www.newhamconnect.uk/Services/3074>

(iv) Mental Health

- The senior Mental Health Lead is Olga Markoulides (DSL and Assistant Principal)
- All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Only trained professionals are in a position to diagnose a mental health problem. But staff are encouraged to notice and identify children who may be experiencing a mental health problem or be at risk of developing one.
- Staff will receive training and guidance on identifying and supporting children with mental health needs. More detailed information about the sixth form's approach can be found in the NCS Mental Health and Emotional Wellbeing Guidance.
- Any concerns about a student's mental health should be referred immediately to the DSL/Mental Health lead or deputies.
- The DSL will decide the best way to support the student. In some cases the DSL will seek advice from our counsellor or psychotherapist in order to decide the best course of action. Options include:
 - Sharing helplines / websites that students can access independently
 - Referral to in-house counsellor or psychotherapist
 - For students who are 16-17: Referral to CAMHS
 - For students who have turned 18: Referral to adult mental health services (such as talking therapies)
 - Referral to other external organisations for specific needs e.g. referral to specialist services for victims of sexual violence

(v) So called 'Honour Based' Abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or 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. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a student might be at risk of HBA, they must contact the DSL as a matter of urgency.

Female Genital Mutilation (FGM)

Female Genital Mutilation is defined as any procedure involving partial or total removal of the external female genitalia, and/or injury to the female genital organs for cultural or other non-therapeutic reason. FGM is illegal in the UK. If a child/young person is taken overseas for FGM, it is still a crime in the UK if the procedure is carried out or assisted by a UK national or permanent UK resident.

The roots of FGM are complex and numerous; indeed, it has not been possible to determine when or where the tradition of FGM originated. The justifications for the practice are numerous, and include:

- Custom and tradition
- Religion
- Preservation of chastity/virginity
- Social acceptance, especially for marriage
- Hygiene and cleanliness
- Increasing sexual pleasure for the male
- Family honour
- A sense of belonging to the group and the fear of social exclusion
- Enhancing fertility

The majority of FGM is carried out in twenty-eight African countries. In some countries, e.g. Egypt, Ethiopia, Somalia and Sudan, prevalence rates can be as high as 98%. In other countries, such as Nigeria, Kenya, Togo and Senegal, the prevalence rates vary between 20 to 50%. Outside Africa, FGM is practised in some parts of the

Middle East, Indonesia, Malaysia and Pakistan. As a result of migration of FGM practising communities, FGM is increasingly found in Europe, Australia, Canada and the USA. In the UK, there are significant numbers of girls from FGM practising communities who have either suffered from FGM, or at risk of suffering GM.

There are four different types of FGM, ranging in severity, but all types of FGM are harmful both physically and psychologically for the girl or woman. Short term effects include:

- Extreme pain
- Shock
- Bleeding
- Broken and dislocated bones
- Injury to adjacent tissue
- Infection and sepsis
- Possible death

Long term effects include:

- Infections
- Bleeding due to repeated de-infibulations
- Recurrent urinary tract infections
- Pelvic inflammatory disease
- Problems passing urine/menstrual blood
- Extreme period pain
- Cysts at site of the FGM
- Problems with infertility

The psychological effects of the practice are poorly researched but include the immediate feelings of shock, fear and panic, and disbelief that their loved ones could allow this to happen to them. Afterwards girls may feel betrayal and display symptoms of post-traumatic stress disorder and may experience genital phobia. FGM is recognised by the United Nations as a violation of the human rights of girls and women. It is illegal in the UK and it is child abuse. The Female Genital Mutilation Act 2003 was enacted to strengthen the law in respect of FGM in England, Ireland and Wales. The 2003 FGM Act brought in extra protection for any girl who is a UK national or UK permanent resident, not only in the UK, but also anywhere in the world. The 2003 legislation also increased the penalty for the performance of FGM or 'aiding, abetting or counselling to procure' FGM to 14 years imprisonment or a fine or both.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Indicators that FGM is to take place:

- Family from an affected community
- Extended holiday
- Sudden withdrawal from college
- Girl is going to have a 'special celebration or ceremony'

Indicators that FGM has occurred:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

Safeguarding Information: HBA

If staff have a concern regarding a child that may be at risk of HBA, they should speak to the DSL (or deputies). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

FGM Mandatory reporting duty

On 31st October 2015 a new duty was introduced that requires teachers to report 'known' cases of FGM in girls under 18 to the police. Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Teachers should also discuss any cases with the designated safeguarding lead and involve children's social services. Do not contact parents. Do not attempt to mediate. Do not allow the child to return home. Do listen to what the child says and make notes. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out). In these cases, teachers should inform the designated safeguard lead and follow local safeguarding procedures.

Forced marriage

(see 'The Right to Choose: Multiagency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage': page 79-84

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. It is also a crime to carry out any conduct to cause a child to marry (whether legally or non-binding or unofficial 'marriages') before their 18th birthday (even in the absence of violence, threats or coercion).

Staff should be aware of the warning signs of potential forced marriage which include:

- Family history: siblings forced to marry or married early, self-harm or suicide of siblings, family disputes, running away from home, unreasonable restrictions, death of parent, intolerance to gay/bisexual/lesbian or transgender
- Health: anxious, depressed, emotionally withdrawn, low self-esteem, self harm/ attempted suicide , accompanied trips to doctors, FGM, pregnancy
- Education: homework appears incomplete or rushed, regular absence, request for extended leave, fear about forthcoming holidays, surveillance by siblings/cousins at school, Decline in engagement/punctuality/performance, being withdrawn from school by people with parental responsibility, not allowed to attend extra-curricular activities

Schools and colleges can play an important role in safeguarding children from forced marriage. All concerns should be taken seriously, not dismissed as 'merely a domestic issue' and immediately be reported to the DSL. If the DSL is not available staff should directly contact the Forced Marriage Unit: 020 7008 0151 or email fm@fcdo.gov.uk.

If there is concern that the child is at immediate risk, call the police.

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be (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 and/or (c) through violence or the threat of violence.

The abuse can be perpetrated by individual or groups, males or females, children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunist to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

CCE and CSE does not always involve physical contact; it can also occur through the use of technology

Child Criminal Exploitation (CCE)

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people. The victim may have been criminally exploited even if the activity appears consensual.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- gang-association and/or isolation from peers/social networks
- 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.

Child Sexual Exploitation (CSE)

The victim may have been sexually exploited even if the sexual activity appears consensual.

CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media)

Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);

- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in:

Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

Safeguarding Information: CCE and CSE

Sixth Form staff can play a key role in protecting children from CCE and CSE. If you think a child is at risk of CCE and/or CSE or that CCE/CSE may have taken place, you must report it immediately as you would any other form of child abuse. If you have any concerns, please contact the DSL. Do listen to what the child says and make notes. Pursuant to Section 5B of the 2003 Act, the Designated Safeguarding Lead or in her absence the Principal will report 'known' cases of CCE/CSE in under 18s which they identify in the course of their professional work to the police.

For children that live in Newham, when there are low or emerging risks of child exploitation with no safeguarding concerns but heightened vulnerabilities, the child will be referred to the Newham PCEHH (Preventing Child Exploitation and Harm Hub), via MASH, for a multiagency discussion to agree a co-ordinated package of support for the whole family. Involving all family members can be a key determinant in supporting children and young people to remain safe and achieve good outcomes. The PCEHH sits within **the Early Help service**, which works with the whole family. This means that the PCEHH also considers both inter-familial as well as intra-familial concerns as part of a co-ordinated and contextual safeguarding approach. All cases must have followed existing child protection procedures prior to being discussed at the PCEHH, including strategy meeting/discussion where appropriate.

We recognise that where one child is exploited by another child, the child perpetrator may themselves be experiencing exploitation and thus must also be recognised as a victim and given appropriate support.

(vii) County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Safeguarding Information: County Lines

If a child is suspected to be at risk of or involved in county lines, report it immediately to the DSL (or deputies). A safeguarding referral will be made to social services alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

(viii) Serious Violence

- All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see paragraphs 33-35).
- All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery

(ix) Child on child abuse

All staff should be aware that children can abuse other children. The college acknowledges that even if there are no reported cases, abuse may still be taking place. The college provides multiple channels via which children can report cases of child-on-child abuse.

Types of child-on-child abuse could include:

- Bullying
 - cyberbullying which can take the form of abusive, harassing and misogynistic messages and images
 - prejudice-based
 - discriminatory bullying
- Abuse in intimate personal relationships between peers (‘teenage relationship abuse’)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- Sexual
 - Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence).

- Sexual harassment, such as sexual comments, remarks, jokes, online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Consensual and non-consensual sharing of nudes and semi nude images and or videos (also known as sexting or youth produced sexual imagery).
- **Upskirting** which involves taking a picture under a person's clothing without their knowledge, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

Safeguarding Information: Child on child abuse

Child on child abuse must never be tolerated by staff or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Females are more likely to be the victims of peer on peer abuse but all child on child abuse is unacceptable and will be taken very seriously. Professionals should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action. Staff are aware of the harm caused by bullying and use the Sixth Form's anti bullying procedures where necessary. However, on occasion a child's behaviour may warrant a response under Child Protection.

In order to encourage students to feel safe to report, they are provided with multiple channels via which they can do so (including email, face to face, and a confidential platform via which they can report concerns). Students are reminded about these channels of reporting on a regular basis. Students are also informed and reminded that they can speak to any member of staff with whom they feel comfortable.

Students are informed that

- their concerns will be taken seriously
- their concerns will be dealt with confidentially and only shared with others in order to protect the student's wellbeing
- they will be offered support as appropriate

The NCS recognises that even if no cases are reported, such abuse may still be taking place and is simply not being reported.

If you think a child is at risk of peer-peer abuse or that abuse may have taken place, you must report it immediately as you would any other form of child abuse. If you have any concerns, please contact the DSL. Do listen to what the child says and make notes. Reassure the child that he/she has done the right thing in telling you. Let him/her know you will need to tell someone else. The DSL will report 'known' cases of peer-peer abuse to social services.

(x) Sexual Violence and Sexual Harassment

Introduction

Sexual violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

The management of children and young people with sexually harmful behaviour is complex and the Principal and DSL will work with other relevant agencies to maintain the safety of the whole school community.

It is important that all victims are taken seriously and offered appropriate support. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment.

Staff are made aware that some groups are more at risk such as females, children with SEND and LGBT children are greater at risk. As part of safeguarding training and updates, staff will be made aware that sexual violence and

sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. It should never be dismissed as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”.

Young people who display harmful sexual behaviours may be victims of abuse themselves and the Child Protection procedures will be followed for both victim and perpetrator.

Definitions

Sexual violence refers to sexual offences under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his 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: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his 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: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone’s bottom/breasts/genitalia without consent, can still constitute sexual assault.)
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes 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.)

Consent: is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- upskirting (which is a criminal offence)
- physical behaviour, such as: deliberately brushing against someone, grabbing bottoms, breasts and genitalia, interfering with someone’s clothes
- displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment (may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence) might include:
 - consensual and non-consensual sharing of nude and semi-nude images and videos;
 - inappropriate sexual comments and messages, including, on social media;
 - sharing of unwanted explicit content
 - sexualised online bullying
 - Sexual exploitation; coercion and threats,
 - Coercing others into sharing images of themselves or performing acts they are not comfortable with online

Harmful sexual behaviour (HSB)

Children's sexual behaviour exists on a continuum (as detailed below) and all behaviours other than 'normal' can fall under the umbrella term of harmful sexual behaviour.

Normal	Inappropriate	Problematic	Abusive	Violent
- Developmentally expected - Socially acceptable - Consensual, mutual, reciprocal - Shared decision-making	- Single instances of inappropriate sexual behaviour - Socially acceptable behaviour within peer group - Context for behaviour may be inappropriate – Generally consensual and reciprocal	- Problematic and concerning behaviour - Developmentally unusual and socially unexpected - No overt elements of victimisation - Consent issues may be unclear - May lack reciprocity or equal power – May include levels of compulsivity	- Victimising intent or outcome - Includes misuse of power – Coercion and force to ensure victim compliance - Intrusive - Informed consent lacking or not able to be freely given by victim - May include elements of expressive violence	- Physically violent sexual abuse - Highly intrusive - Instrumental violence that is psychologically and/or sexually arousing to the perpetrator - Sadism

Prevention

The NCS will consider sexual violence and harassment as part of providing a broad and balanced curriculum. The college has a clear set of values and standards, and these will be upheld and demonstrated throughout all aspects of college life. This will be underpinned by the school's behaviour policy and pastoral support system, the curriculum and staff safeguarding training, where staff are made aware of how to support children and how to manage a disclosure.

Students will be taught about sexual violence and sexual harassment within the broad and balanced curriculum at the NCS. This education will include but will not be limited to the following issues:

- healthy and respectful relationships;
- what respectful behaviour looks like;
- consent;
- stereotyping, equality;
- body confidence and self-esteem;
- prejudiced behaviour;
- that sexual violence and sexual harassment is always wrong;
- addressing cultures of sexual harassment
- online sexual related behaviours

Safeguarding Information: Sexual Violence and Sexual Harassment

The following section should be read in conjunction with part 5 of Keeping Children Safe in Education (2023) and below provides a summary of the college's approach.

The college's approach to sexual violence and sexual harassment is part of our broader approach to safeguarding.

Responding to reports of sexual violence and sexual harassment

(see paragraphs 460 onwards KCSIE 2023)

- Staff at the NCS recognise that the initial response to a report from a child is incredibly important.
- **All** victims will be reassured that they are being taken seriously and that they will be supported and kept safe.
- Where possible a disclosure from a child should be received by two members of staff, one of whom should be the DSL or deputy.
- When receiving a report from a child, staff should
 - Recognise that a child is likely to disclose information to someone they trust. This person should thus be supportive and respectful of the child
 - Not promise confidentiality at this initial stage as it is likely a concern will have to be shared further (people who might need to be informed include parents/carers, social care, police)
 - Be aware that during the first disclosure, the child might not be able to recall all details or timeline of abuse
 - Keep in mind that children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation
 - Listen carefully, reflect back using the child's language, be non-judgemental, be clear about how the report will be progressed, not ask leading questions and only use open questions (e.g. when, where, what etc).
 - Be aware that it is acceptable to ask a child if they have been harmed and ask what the nature of that harm was
 - Make a written record of the facts using the child's own language (usually straight afterwards to avoid reducing interaction with the child, but notes can be made at the time if two members of staff are present).
- Any incidences of sexual harassment and/or violence observed by staff or reported to staff (e.g. by a student's friend), must be referred to the Designated Safeguard Lead (or deputy) in the same way as any other safeguarding concern is reported.
- If the DSL or the Principal are not available, or staff members have concerns about a child's welfare they should act immediately rather than waiting to be told.
- Where there has been a report of sexual violence, the DSL and the Principal will give immediate consideration to how best to support the victim, the alleged perpetrator and all other children.
- The DSL and Principal can call the NSPCC helpline for advice and support on 0808 800 5000

Responding to reports which include an aspect of Online Sexual Violence and Harassment

- The NCS recognises that
 - sexual violence and harassment can occur online. In some cases this will be in addition to what occurs face to face and in other cases it might be stand alone.
 - Online incidents can extend further than our college community
 - There is the potential for the victim and alleged perpetrator to become marginalised
 - There is potential for repeat victimisation
- Where a report includes an online element, staff must not view or forward illegal images of children.

Who to inform and Initial Actions following a report of Sexual violence or harassment (see SVSH, 2021 62-64 and KCSIE, 2023 472 – 477)

The starting point will always be that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated.

The DSL and Principal will make decisions using their professional judgement and act in the best interests of the child. They will decide as to whether the report will be managed internally (utilising behaviour and bullying policies and by providing pastoral support), involve Early Help, require a referral to children's social care and/or be reported to the police.

In making this decision, they will consider

- The wishes of the child
- The nature of the incident
- The ages & developmental stages of the children involved
- Any power imbalance
- If it is one-off or sustained pattern of abuse
- That sexual violence and harassment can take place within intimate relationships
- Possibility of intra familial harms and any necessary support for siblings following incidents
- Whether there are ongoing risks to the victim, other children, staff, the whole college community
- Other related issues and wider context including links to CSE or CCE

More guidance to help make this decision can be found in paragraphs 60-65 and 92-97 SVSH, 2021)

- Victims may ask the college not to tell anyone. This must be dealt with on a case by case basis. The DSL and Principal should consider
 - parents or carers should normally be informed when there has been a report of sexual violence (unless this would put the victim at greater risk);
 - the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to children's social care; and
 - rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police.
- The Principal and DSL will consider Gillick competency and Fraser guidelines in discussion with social services. (<https://learning.nspcc.org.uk/child-protection-system/gillick-competence-fraser-guidelines>)
- If the DSL and Principal make a referral against the victim's wishes this must be handled extremely carefully after seeking advice from external professionals (e.g. Safeguarding Supervisor and/or social services).

Anonymity:

- When an allegation of sexual violence or sexual harassment is going through the criminal justice system, the NCS will be aware of the importance of anonymity and will
 - Do all they can to protect the anonymity of the children involved
 - Consider which staff should know about the report
 - Consider what support will be put in place for students involved
 - Consider the impact of social media

Risk assessment

(see paragraph 481 – 483 KCSIE 2023)

A risk assessment will be completed and considered on a case to case basis. Where appropriate an AIM risk assessment template will be used. The DSL and the Principal will consider

- The victim, especially their protection and support
- Whether there may have been other victims
- The alleged perpetrator
- All other children at the college
- The time and location of the incident and any action required to make the location safer

The risk assessment should include engagement with children's social care and specialist services as required.

Any risk assessment will be recorded and kept under review. At all times decisions will be made to ensure the college is supporting and protecting children.

Supporting the Victim (KCSIE, 2023 point 532-533)

- The needs and wishes of the victim are paramount. The victim will never be made to feel they are causing a problem or should feel ashamed for making a report.
- The DSL will speak with the victim to find the appropriate form of support (potentially in parallel with referrals to Early Help or Children's social care). This might involve support from
 - the NCS counsellor or psychotherapist
 - CAMHS
 - referral to specialist organisations such as Children and Young People's Independent Sexual Violence Advisors (ChISVA) e.g. Rape Crisis, The Survivors Trust, nia, the Male Survivors Partnership
 - recommendation to visit NHS sexual health clinics (since victims might also require medical attention)

Unsubstantiated, unfounded, false or malicious reports

- The DSL will consider whether the child and/or the person who made the allegation is in need of help and this might have been a cry for help. This might lead to a referral to children's social care.
- If a report is malicious the DSL and Principal will consider whether any disciplinary action is appropriate in line with the behaviour policy

Safeguarding and Supporting the Alleged Perpetrator

KCSIE, 2023, paragraph 542 and SVSH, 2021 points 88 – 90)

- The NCS recognises that the alleged perpetrator
 - will likely experience stress as a result of being subject to allegations
 - may potentially have unmet needs and the HSB displayed may be a symptom of their own abuse or exposure to abuse
- The DSL and Principal will consider support and sanctions for the alleged perpetrator on a case-by-case basis and will ensure that the response is proportional to the situation.
- The Principal and/or DSL will meet with the parents of the alleged perpetrator (usually after having taken advice from Children's social care and /or the police if they are involved)
- The NCS will aim to implement appropriate disciplinary actions but also ensure that the alleged perpetrator is supported
- The Principal and DSL can refer to external sources of guidance as listed in KCSIE and SVSH and Suspension i and Permanent Exclusion from maintained schools, academies and pupil referral units in England (May 2023)

Involvement of Other Children

(SVSH, 2021 points 98-103)

- The NCS is aware that children who have witnessed sexual violence may also require support
- The NCS will
 - Do all we can to ensure the victim, alleged perpetrator and any witnesses are not bullied or harassed
 - Be aware of the role that social media might play in interactions between students, who might take 'sides'
 - Use the appropriate procedures as set out in the behaviour and anti-bullying policies

(xi) Sharing nudes and semi-nudes

This is based on the UK Council for Internet Safety (UKCIS) "Sharing nudes and semi-nudes", Dec 2020.

The term 'sharing nudes and semi nudes' refers to the sending or posting of nude or semi nude images, videos or live streams by young people under the age of 18 online. Production and sharing of these images/videos is illegal (even if it is consensual).

Alternative terms which are used include: 'dick pics', 'pics', 'youth produced sexual imagery', 'youth involved sexual imagery', 'indecent imagery' (this is the legal term), 'sexting' (tends to be used by adults however young people often interpret this as sharing explicit written messages), 'image-based sexual abuse'.

Images and videos could be shared via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services such as AirDrop which work offline. The increase in the speed and ease of sharing imagery has brought concerns as it can expose young people to risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to sexual exploitation.

The types of incidents which this advice covers are:

- A person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18
- A person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

This advice does not cover:

- The sharing of nudes and semi-nudes of people under 18 by adults as this constitutes child sexual abuse and the college will always inform the police.
- Young people under the age of 18 sharing adult pornography or exchanging sexual texts which don't contain imagery.

There are many different types of youth produced imagery and it is unlikely that two cases will be the same. Whilst it is necessary to carefully consider each case on its own merit it is also important to apply a consistent approach when dealing with any incidents to help safeguard children. The contributory factors in each case will need to be considered to determine an appropriate and proportionate response.

There are different contexts and motivations for young people to be involved in sharing nudes and semi-nudes as summarised below.

Youth produced sexual images					
Aggravated			Experimental		
Adult involved	Youth only - intent to harm	Youth only – reckless misuse	Romantic	Sexual attention seeking	Other
adult offenders attempt to develop relationships by grooming children and young people, in criminal sex offences even without the added element of nudes and semi-nudes. Victims may be family friends, relatives, community members or contacted via the Internet. The images may be solicited by adult offenders	these cases can arise from interpersonal conflict, such as break-ups and fights among friends, or criminal/abusive conduct such as blackmail, threats or deception, sexual abuse or exploitation by young people	images are taken or sent without the knowing or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result	incidents in which young people in ongoing relationships make images for themselves or each other, and images were not intended to be distributed beyond the pair	incidents within this category can be a part of normal childhood. A child or young person should not be blamed for taking and sharing their image	Do not have aggravating elements, but do not fit romantic or attention seeking. Include young people taking pictures of themselves for themselves or pre-adolescent children who do not have seem to have sexual motives

When an incident involving youth produced sexual imagery comes to the college's attention:

- The incident should be referred to the DSL as soon as possible.
- The DSL should hold an initial review meeting with appropriate college staff (which is likely to include the staff member to whom the disclosure was made and the safeguarding team).
- There should be subsequent interviews with the young people involved (if appropriate).
- Parents should 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 will be made to children's social care and/or the police immediately.

Handling Incidents

Disclosure by a student

Any direct disclosure by a young person should be taken seriously and will follow normal safeguarding protocols. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. The young person will need pastoral support during the disclosure and after the event.

Initial Review Meeting

The initial review meeting will consider the initial evidence and aim to establish:

- Whether there is an immediate risk to a young person or young people
- If a referral should be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery should **not** be viewed
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms. This may be unknown.
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the young people involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved – in most cases parents should be involved

An immediate referral to police and/or children's social care will be made if at this initial stage:

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 (for example, owing to special educational needs)
3. What you know 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 pupil in the imagery is under 13
5. There is reason to believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming

The decision to respond to any incident without involving the police or children's social care will be made in cases when the DSL is confident that they have enough information to assess the risks to students involved and the risks can be managed within the college's pastoral support and disciplinary framework.

The decision will be made by the DSL with input from the Principal and from other members of staff if appropriate. Any decisions will be recorded in line with college policy and be based on consideration of the best interests of the young people involved. The decision will take into account proportionality as well as the welfare and protection of the young people. The decision will be reviewed throughout the process of responding to the incident.

Assessing risk

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks.

When assessing the risks, the following should be considered:

- Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
- Who has the image been shared with? Has the image been shared beyond its intended recipient? Was it shared without the consent of the student who produced the image?

- Has the image been shared on social media or anywhere else online? What steps have been taken to contain the spread?
- How old are the young people involved?
- Are there any adults involved in the sharing of the imagery?
- What is the impact on the young people involved?
- Do the young people involved have additional vulnerabilities?
- Has the young person taken part in this kind of activity before?

It is likely that it will be necessary for a member of staff (ideally DSL) to have a conversation with the young person to ascertain the answers to these questions.

The DSL should read the guidance about Supporting a young person involved (SVSH, Section 2.5 on pages 22 – 24) prior to conducting the conversation with the the student.

Informing parents (or carers)

- Parents (or carers) should be informed and involved in the process at an early stage unless informing the parent will put the young person at risk of harm. Any decision not to inform the parents would generally be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when the parents should be informed.
- The DSL will work with the young people involved to decide on the best approach for informing parents.

Reporting incidents to the police

- It is not always necessary to report to the police. A report should always be made to the police if there are abusive or aggravating factors.
- The report to the police should be via MASH.
- Once a report is made to the police, the report has to be recorded and the police will conduct an investigation. This may include seizure of devices and interviews with the young people involved.

Securing and handing over devices to the police

If any devices need to be seized and passed to the police then the device(s) should be confiscated and the police should be called. The device should be turned off and placed under lock and key until the police are able to come and retrieve it.

Searching devices, viewing and deleting imagery

Viewing the imagery

Adults should **not** view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible responses to incidents should be based on what DSLs have been told about the content of the imagery. The decision to view imagery should be based on the professional judgement of the DSL and should always comply with the child protection policy and procedures of the college. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the student.

If a decision is made to view imagery, the DSL would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a school device or network

If it is necessary to view the imagery, then the DSL should:

- Never copy, print or share the imagery; this is illegal
- Discuss the decision with the Principal

- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Principal
- Ensure viewing takes place with another member of staff present in the room, ideally the Principal or a member of SLT. This staff member does not need to view the images.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery
- Record the viewing of the imagery in the college's safeguarding records including who was present, how and why the image was viewed and any subsequent actions. This will be signed and dated.

Deletion of imagery

If the DSL/Principal has decided that other agencies do not need to be involved, then the imagery will be deleted from devices and online services to limit any further sharing of the imagery. The young people involved will be asked to delete imagery and to confirm that they have deleted the imagery by a specified date. The young people involved will be informed that if they refuse or it is later discovered they did not delete the image they are committing a criminal offence and the police may become involved.

Recording incidents

All decisions will be recorded, including times, dates and reasons for decisions made and logged in the safeguarding records. Parents and carers will also be informed unless this presents a further risk to the young person. The college may invoke the college's behaviour policy to discourage young people from sharing, creating or receiving images.

Removal of nudes and semi-nudes online

Students might need support with the removal of images/videos from devices and social media.

- Most online service providers have their own reporting function
- Students can use the IWF and Childline's Report Remove tool: <https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/remove-nude-image-shared-online/>
- A copy of the original image/video is required in order to use this tool. Therefore, this must be done prior to images/videos being deleted.

(xi) Domestic abuse

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here: <https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

Types of domestic abuse include

- intimate partner violence,
- abuse by family members,
- teenage relationship abuse and
- child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Safeguarding Information: Domestic abuse

If staff have a concern regarding a child being at risk of, or exposed to, domestic abuse, they must report it immediately to the DSL (or deputies) who will make appropriate referrals to social services and use existing multi agencies to support the child. The sixth form is part of **Operation Encompass**, a system where police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced domestic abuse incident, they police will inform the DSL in school before the child/children arrive at school the following day. This ensures the college has up to date relevant information about a child's circumstances and can intervene to support the child's needs. The Key Adult for Operation Encompass is the DSL, Olga Markoulides.

17. Responding to Concerns about a Member of Staff

- 17.1 Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff at the NCS to abuse children.
- 17.2 All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children and young people immediately. Allegations or concerns about colleagues and visitors must be reported direct to the Principal unless the concern relates to the Principal. If the concern relates to the Principal, it must be reported immediately to the Chair of Governors, who will liaise with the Local Authority Designated Officer (LADO) in children's social care who will in turn decide on any action required. Staff are regularly reminded of this and encouraged to speak openly about any concerns.
- 17.3 The Principal (if the concern is about a member of staff) or Chair of Governors (if the concern is about the Principal) has to decide whether the concern is an allegation or low-level concern.
- 17.4 If a member of staff is removed or dismissed (or would have been dismissed if they had not left first)
- due to safeguarding concerns, the Principal(if a member of staff is dismissed) or Chair of Governors (if the Principal is dismissed) will ensure that a referral is made to the Disclosure and Barring Service.
 - due to serious misconduct, the Principal (if a member of staff is dismissed) or Chair of Governors (if the Principal is dismissed) will gain advice from the LADO about whether a referral should be made to the Secretary of State via the Teaching Regulation Agency.

Allegations

- 17.5 It is an allegation if it is alleged that a member of staff (including supply), governor, visiting professional or volunteer has:
- Behaved in a way that has harmed a child or may have harmed a child;
 - Possibly committed a criminal offence against or related to a child; or

- Behaved towards a young person or young people in a way that indicates he or she would pose a risk of harm if they work regularly or closely with young people.
 - Behaved in a way that indicates s/he is unsuitable to work with children
- These behaviours might be within or outside of the workplace (including online)

Response to Allegations about a member of staff

- 17.6 If there has been an allegation against an adult at the NCS, the following procedure will be followed, together with the statutory guidance in Keeping Children Safe in Education (2023) – Part Four.
- 17.7 This includes allegations against staff in their personal lives. Whilst we acknowledge such allegations, (as all others), may be false, malicious or misplaced, we also acknowledge they may be founded. It is, therefore, essential that all allegations are investigated properly, in line with agreed procedures and outcomes recorded
- 17.8 If a child makes an allegation about a member of staff, governor, visitor or volunteer the Principal should be informed immediately. The Principal should carry out an urgent initial consideration in order to establish whether there is substance to the allegation. The Principal should not carry out the investigation himself or interview students. The Principal should follow procedures as outlined below.
- 17.9 The Principal must exercise, and be accountable for, their professional judgement on the action to be taken, as follows:
- If the actions of the member of staff, and the consequences of the actions, raise credible child protection concerns the Principal will notify the Local Authority Designated Officer (LADO) Team. The LADO Team will liaise with the Chair of Governors and advise about action to be taken, and may initiate internal referrals within children's social care to address the needs of children likely to have been affected.
 - If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the member of staff or the student(s), these should be addressed through the school's own internal procedures.
 - If the Principal decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded in the child protection file.
- 17.10 Where an allegation has been made against the Principal, then the Chair of the Governing Body takes on the role of liaising with the LADO team in determining the appropriate way forward.

Low level concerns

- 17.11 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- e.g. being over friendly with children; having favourites, taking photographs of children on their mobile phones contrary to school policy; engaging with a child on a one-to-one basis in a secluded space; humiliating pupils

- 17.12 The NCS supports a culture of openness, trust and transparency and encourages staff to share any low level safeguarding concerns with the Principal.
- 17.13 The Principal will send termly reminders to staff about how to report low level concerns.

Response to Low level about a member of staff

- 17.14 When a low-level concern is shared, the following actions will be led by the Principal:
- the response will be sensitive & proportionate
 - the member of staff involved will be informed and supported to modify their behaviour
 - a record will be made including
 - the name of the individual who raised the concern (unless they wish to remain anonymous)
 - the details of the concern and the context in which it arose
 - action taken
 - Records will be kept confidentially and held securely by the Principal in compliance with the Data Protection Act 2018. They will be kept for as long as the member of staff works at the NCS.
 - Concerns will be reviewed termly to allow for any patterns in concerning, problematic or inappropriate behaviours in individuals or across the college to be identified and acted upon
 - The Principal will use professional judgement to decide how serious a concern is and will make a report to the LADO where appropriate.
- 17.15 NCS staff are encouraged to also self-report any situations they have found themselves in which could be misinterpreted or which could lead to a complaint against you, e.g. accidentally using a swear word during a lesson. . This can either be done verbally directly to the Principal, or using the 'Neutral Notification' form which is reviewed by the Principal .

18. Whistleblowing

- 18.1 We cannot expect young people to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues.
- 18.2 A whistleblowing disclosure must be about something such as:
- a criminal offence has been committed, is being committed or is likely to be committed
 - an legal obligation has been breached
 - there has been a miscarriage of justice
 - the health or safety of any individual has been endangered
 - the environment has been damaged
 - information about any of the above has been concealed.
- 18.3 Whistleblowing procedures are discussed as part of staff safeguarding training and a copy of the NCS Whistleblowing Policy is kept in All Staff One Drive and on the NCS website.
- 18.4 Staff can contact the NSPCC Whistleblowing helpline 0800 028 0285 or help@NSPCC.org.uk

19. Related Policies

This policy should be read in conjunction with Sixth Form policy and procedures for:

- Attendance
- Behaviour
- Anti-Bullying
- E Safety
- Exclusion
- Health and safety
- iPad Use
- SEND
- Whistle Blowing
- Equality
- Mental Health and Emotional Wellbeing
- Bereavement and Loss Guidance
- CoLAT Safer Recruitment

Annexes

Annex One: Recognising Abuse & Neglect

The NCS recognises that while all children/young people have a right to be safe, some children/young people may be more vulnerable to abuse; for example,

- those with a disability or special educational needs;
- young carers;
- where family circumstances present the child with challenges such as drug and alcohol misuse,
- adult mental health issues and domestic abuse;
- is showing signs of being drawn into anti-social and/or criminal behaviour including gang involvement;
- is at risk of trafficking, modern day slavery or exploitation;
- is at risk of being radicalised or exploited;
- Looked After Children and Previously Looked After Children.

Definitions and Indicators of Abuse

As defined in the Children's Acts 1989 and 2004, a child is anyone who has not yet reached his/her 18th birthday (WTTSC, 2018).

It is vital for staff to know what to look for in order to quickly identify cases of abuse, neglect and/or specific safeguarding issues. This will allow students who require help or protection to be identified as soon as possible..

Harm: Harm means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another; Development means physical, intellectual, emotional, social or behavioural development; Health includes physical and mental health; Ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical.

(Definitions of abuse taken from KCSIE Sept 2023, Paragraphs 26-30)

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing 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 or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

1. Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers);
- or ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger;
- Stealing, scavenging and/or hoarding food;
- Frequent tiredness or listlessness;
- Frequently dirty or unkempt;
- Often poorly or inappropriately clad for the weather;
- Poor school attendance or often late for school;
- Poor concentration;
- Affection or attention seeking behaviour;
- Illnesses or injuries that are left untreated;
- Failure to achieve developmental milestones, for example growth, weight;
- Failure to develop intellectually or socially;
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings;
- The child is regularly not collected or received from school; or
- The child is left at home alone or with inappropriate carers.

2. Physical Abuse

Physical abuse 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.

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape;
- Bruises that carry an imprint, such as a hand or a belt;
- Bite marks;
- Round burn marks;
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks;
- An injury that is not consistent with the account given;
- Changing or different accounts of how an injury occurred;
- Bald patches;
- Symptoms of drug or alcohol intoxication or poisoning;
- Unaccountable covering of limbs, even in hot weather;
- Fear of going home or parents being contacted;
- Fear of medical help;
- Fear of changing for PE;
- Inexplicable fear of adults or over-compliance;
- Violence or aggression towards others including bullying; or
- Isolation from peers.

3. Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge;
- Anal or vaginal discharge, soreness or scratching;
- Reluctance to go home;
- Inability to concentrate, tiredness;
- Refusal to communicate;
- Thrush, persistent complaints of stomach disorders or pains;
- Eating disorders, for example anorexia nervosa and bulimia;
- Attention seeking behaviour, self-mutilation, substance abuse;
- Aggressive behaviour including sexual harassment or molestation;
- Unusual compliance;
- Regressive behaviour, enuresis, soiling;
- Frequent or open masturbation, touching others inappropriately;
- Depression, withdrawal, isolation from peer group;
- Reluctance to undress for PE or swimming; or
- Bruises or scratches in the genital area.

4. Emotional Abuse

Emotional abuse involves 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.
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction.
- seeing or hearing the ill-treatment of another.
- 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.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly;
- Over-reaction to mistakes;
- Delayed physical, mental or emotional development;
- Sudden speech or sensory disorders;
- Inappropriate emotional responses, fantasies;
- Neurotic behaviour: rocking, banging head, regression, tics and twitches;
- Self-harming, drug or solvent abuse;
- Fear of parents being contacted;
- Running away;

- Compulsive stealing;
- Appetite disorders e.g. anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

NB: Some situations where children stop communication suddenly (known as “traumatic mutism”) can indicate maltreatment.

Indicators of abuse & neglect in Disabled Children

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child;
- Not getting enough help with feeding, leading to malnourishment;
- Poor toileting arrangements;
- Lack of stimulation;
- Unjustified and/or excessive use of restraint;
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries;
- Unwillingness to try to learn a child’s means of communication;
- Ill-fitting equipment. for example, callipers, sleep boards, inappropriate splinting;
- Misappropriation of a child’s finances; or
- Inappropriate invasive procedures.

Annex Two: Physical Contact and Positive Handling

Physical contact with students

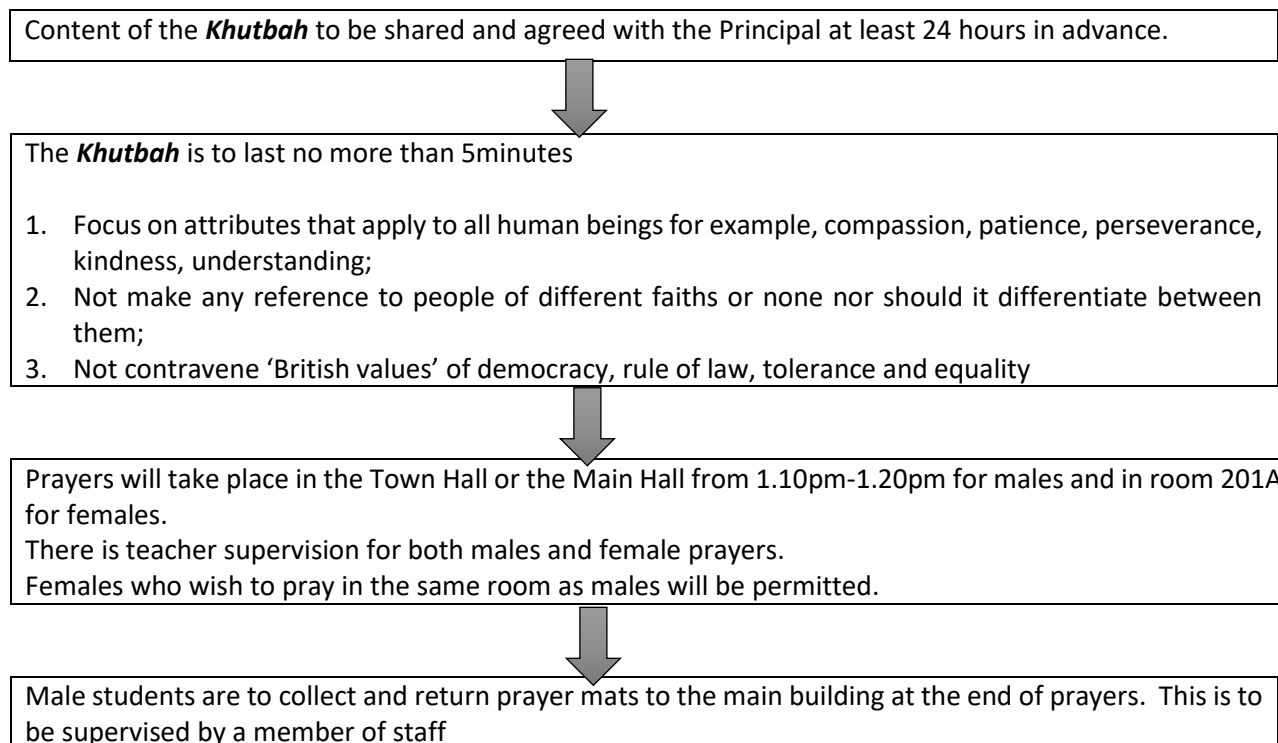
- It is unrealistic to suggest that staff should touch students only in emergencies. Very few people would adhere to a no touch policy if it is applied to people they care about. Physical prompts, guides and reassurances are necessary in a range of settings appropriate to the age of the student and circumstances at the time. More intrusive physical contact may be necessary when people are supporting young children with disabilities. Positive touch is appropriate when it meets the needs of the student.
- Staff must bear in mind that even perfectly innocent actions can sometimes be misconstrued. Young people may find being touched uncomfortable or distressing for a variety of reasons. It is important for staff to be sensitive to a young person's reaction to physical contact and to act appropriately. It is also extremely important not to touch students, however casually, in ways or on parts of the body that might be considered inappropriate.

Positive Handling

- In extreme cases, a member of staff may have to physically restrain a student to prevent him/her causing injury to himself/herself, to others or to property. In such instances no more than 'reasonable force' should be used and staff must seek to avoid causing injury to the student. Advice on the use of force to control or restrain students is contained in Guidance on the Use of Reasonable Force (DfE 2013).
- We understand that positive handling of a nature that causes injury or distress to a child may be considered under Child Protection or Disciplinary Procedures
- Any circumstances that require a member of staff to use positive handling techniques should be recorded and signed by a witness.
- The NCS will ensure that at least one member of SLT will be appropriately trained in Positive Handling techniques. **Matthew Edwards, Vice Principal**, has been trained in positive handling techniques.

Annex Three: Protocol for Friday Prayers

- At the NCS we do not have a designated prayer room but allow students to use classrooms for quiet reflection during lunch and after college. The presence of staff on duty ensures that students are carefully monitored.
- On Friday, there is an opportunity for collective prayer and robust protocols have been established to safeguard against any inappropriate behaviour and/or comments. Students are encouraged to be vigilant and staff and/or students must report any concerns to either the DSL or the Principal.



The NCS reserves the right to cancel or suspend a Friday prayer where the content of the Khutbah is inappropriate or has not been submitted 24hours prior to Friday prayer. Where the Main Hall/Town Hall is not available and students cannot be accommodated elsewhere in the NCS, students must attend the local mosque to pray.

Annex Four: Details of Safer Recruitment Procedures

Full and comprehensive safer recruitment procedures are laid out within the CoLAT Safer Recruitment and Selection Policy.

1. Introduction

The purpose of this policy is to set out the minimum requirements of a recruitment process that aims to:

- attract the best possible applicants to vacancies;
- deter prospective applicants who are unsuitable to work with children or young people;
- identify and reject applicants who are unsuitable to work with children and young people.

2. Statutory Requirements

There are some statutory requirements for the appointment of some staff in schools, notably the Leadership Team. These requirements change from time to time and must be met.

3. Identification of Recruiters

Subject to the availability of training, the college will move towards a position in which at least two recruiters have successfully received accredited training in safe recruitment procedures. The NCS will work towards ensuring all members of the SLT receive Safer Recruitment Training.

4. Inviting Applications

Advertisements for posts – whether in newspapers, journals or online – will include the statement:

“The NCS is committed to safeguarding the welfare of children and expect all staff to share this commitment.

All post holders are subject to a satisfactory enhanced Disclosure and Barring Service (DBS) check.”

Prospective applicants will be supplied, as a minimum, with the following:

- job description and person specification including the safeguarding requirement of the role
- the college’s child protection policy;
- the college’s recruitment policy including policy on employment of ex-offenders
- an application form which includes
 - a statement which says that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children
 - the applicant’s:
 - personal details, current and former names, current address and national insurance number;
 - details of their present (or last) employment and reason for leaving;
 - full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment;
 - qualifications, the awarding body and date of award;
 - details of referees/references (see below for further information); and
 - a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

All prospective applicants must complete, in full, an application form.

Applicants will be required to physically sign a declaration that the information they have provided is true.

5. References

- Where possible, references from the most recent employer should be taken up before the selection stage, so that any discrepancies can be probed and form part of the decision-making process.
- References will be sought from a senior person from the relevant employer from the last time the applicant worked with children or from the candidate's current employer
- References will be sought directly from the referee, and if they are sent electronically the legitimacy of the source will be checked. References or testimonials provided by the candidate will never be accepted. References must be returned and signed by the Principal before the employee starts work.
- Information in the reference(s) will be compared with the applicant's form and where necessary, referees will be contacted by telephone or email to clarify any anomalies or discrepancies. A detailed written note will be kept of such exchanges.

Where necessary, previous employers who have not been named as referees will be contacted to clarify any anomalies or discrepancies. A detailed written note will be kept of such exchanges. Referees will always be asked specific questions about:

- the candidate's suitability for working with children and young people;
- any disciplinary warnings, including time-expired warnings that relate to the safeguarding of children;
- the candidate's suitability for the advertised post.

6. Shortlisting

- Short-listing of candidates will be against the person specification for the post and will be carried out by at least two members of staff who look for inconsistencies and gaps in employment and explore any potential concerns.
- Shortlisted candidates will be required to make a self-declaration of their criminal record or information that would make them unsuitable to work with children, in accordance with the ministry of Justice guidance on disclosure of criminal records.
- Online searches will be carried out for shortlisted candidates. Candidates will be informed that this will be done as part of due diligence checks. This will not include investigation of the candidate's private life. The online check will include a basic check on a search engine (Google, Mozilla, Edge, Safari), the main social media and video platforms (Facebook, Twitter, Instagram, TikTok and YouTube), and a search of professional sites such as LinkedIn. It will be carried out by someone who is not on the recruitment panel and only information regarding reputation or safeguarding will be shared with the selection panel who will raise this with the candidate who will be given an opportunity to respond to any concerns.

7. The Selection Process

Selection techniques will be determined by the nature and duties of the vacant post, but all vacancies will require an interview of short-listed candidates.

Interviews will always be face to face. Telephone interviews may be used at the short-listing stage but will not be a substitute for a face to face interview (which may be via visual electronic link such as Zoom or Microsoft Teams).

Where possible the selection process will include observing the candidate interact with students.

Candidates will always be required:

- to explain satisfactorily any gaps in employment;
- to explain satisfactorily any anomalies or discrepancies in the information available to recruiters;

- to declare any information that is likely to appear on a DBS disclosure;
- to demonstrate their capacity to safeguard and protect the welfare of children and young people.

Interviews should include the opportunity to find out

- (i) the candidate's motivation for working with children,
- (ii) skills and examples of experience working with children,
- (iii) about any gaps in employment or where the candidate has frequently changed employment or location

Interviews should explore possible areas of concern such as

- (i) implication that adults and children are equal,
- (ii) lack of recognition and/or understanding of vulnerability of children,
- (iii) inappropriate idealisation of children,
- (iv) inadequate understanding of appropriate boundaries between adults and children and
- (v) indicators of negative safeguarding behaviours

Selection will always include consideration of information about past disciplinary action or allegations.

8. Employment Checks

All successful applicants are required:

- to provide proof of identity, where possible by checking the birth certificate
- to have an enhanced DBS check and receive satisfactory clearance*. If the post is for regulated activity then the DBS must also include children's barred list information. When the DBS update service is used, the physical certificate must be presented prior to the start of employment or as soon practicable afterwards. Prior to the DBS certificate being available, staff will be appropriately supervised and all other checks will be carried out, including a separate child's barred list check.
- To join the DBS update service
- to provide actual certificates of professional qualifications, including the teaching regulation agency's employer access service to verify any award of QTS and the completion of induction,
- to complete a confidential health questionnaire to verify the candidate's mental and physical fitness to carry out their work responsibilities
- to provide proof of eligibility to live and work in the UK

*when assessing any disclosure information on a DBS certificate the college will take into consideration the applicant's explanation including, e.g. the seriousness and relevance to the post applied for, how long ago the offence occurred, whether it was one-off or a history of incidents, the circumstances around the incident and whether the individual has accepted responsibility for their actions.

Note: In line with Points 276 of KCSIE 2022, copies of DBS certificates do not need to be retained by the NCS.

- An applicant will not be offered a management position if they are subject to a section 128 direction made by the secretary of state
- An application will not be offered a teaching position if they are subject to a prohibition order issued by the Secretary of State

Applicants who have worked outside of the UK

Individuals who have lived or worked outside of the UK must undergo the same checks as all other staff in schools or colleges. In addition, colleges will make further checks as set out in paragraph 280-285 KCSIE 2022.

We do not take copies of documentation until a job has been accepted by the successful candidate.

9. Induction

All staff who are new to the sixth form will receive induction training that will include the college's safeguarding policies and guidance on safe working practices, along with appropriate advice, training and resources set out in the Trust's staff induction Guidance and Checklist.

-Induction training will include:

- Reading Part One of KCSIE
- The NCS Safeguarding and Child Protection policy, (including procedures to deal with peer on peer abuse, the response to children who go missing from education, the role of the designated safeguarding lead and deputies);
- behaviour policy (which includes measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the staff code of conduct;

Regular meetings will be held during the first 6 months of employment between the new employee(s) and the appropriate manager(s) all in line with the Trust's Probationary Policy and Procedures.

Checks on Existing Staff

- In the following circumstances the NCS will carry out new checks on existing staff. When
 - an individual working at the school or college moves from a post that was not regulated activity with children into work which is considered to be regulated activity with children.
 - there has been a break in service of 12 weeks or more; or
 - there are concerns about an individual's suitability to work with children.

Referral to Disclosure and Barring Service

- the college will make a referral, as soon as possible, to the DBS when an individual is removed from regulated activity (or would have been removed if the individual had not left) and it is believed that the individual has
 - engaged in relevant conduct in relation to children and/or adults
 - satisfied the harm test in relation to children and/or vulnerable adults; or
 - been cautioned or convicted of a relevant (automatic barring either with or without right to make representations) offence

Referral to the Teaching Regulation Agency

- the college will consider making a referral to the Secretary of state (as required by sections 141D and 141E of the Education Act 2002) when a teacher is dismissed or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first

Employment of agency and third party staff

- The NCS will
 - Obtain written notification from any agency or third party organisation that they have carried out the checks on an individual who will be working at the college, this will include that the enhanced DBS certificate has been obtained
 - Obtain a copy of the DBS certificate from the agency and where appropriate this will include barred

list information

- Confirm the identity of the person presenting themselves to work

Contractors

- The NCS will
 - set out safeguarding requirements in the contract with the organisation
 - ensure that any contractor who will be working at the NCS site has been subject to the appropriate level of DBS check

Trainee/student teachers

- If the trainee teacher is salaried by the NCS, the college will ensure that the appropriate checks are carried out, including enhanced DBS with children's barred list information
- If the trainee teachers are fee-funded the NCS will obtain written confirmation from the provider that all pre-appointment checks have been carried out and the trainee has been judged as suitable to work with children

Visitors

- Any visitors must be agreed to by the Principal.
- If they have been DBS checked, they must bring evidence.
- Visitors must sign in/out at reception and show ID (preferably photo ID).
- Visitors will be given:
 - **Red/green/blue** lanyard and a visitors badge which must be worn at all times
 - A leaflet outlining Safeguarding Procedures, Health and Safety
- Visitors with a red lanyard should not be left alone with students.
- Visitors with a green lanyard have been DBS checked and can be left alone with students.
- Visitors with a blue lanyard are Governors and are DBS checked.
- Once they have signed in, visitors will wait at reception to be collected by a member of staff.
- Identity and DBS checks will not be required for visitors such as children's relatives

Volunteers

- Volunteers who work with NCS students will either
 - Have had an enhanced DBS check with children's barred list; or
 - Will be supervised by a member of NCS staff
- Under no circumstances will volunteers on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity

Governors

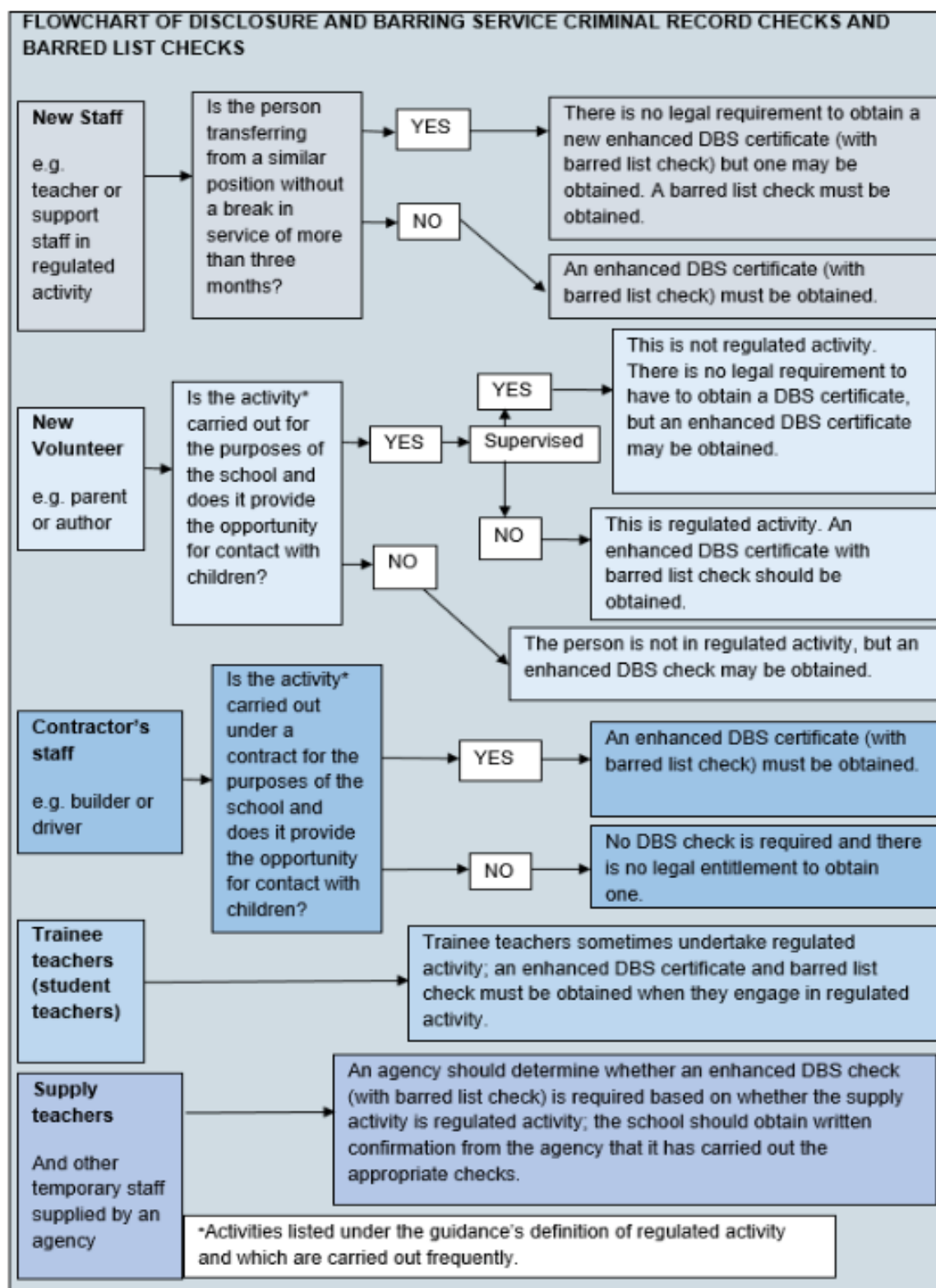
- The governing body is responsible for ensuring that all governors have an enhanced DBS check and have a clear Section 128 check

Work experience

- When the NCS arranges work experience placements for students, we will ensure that the placement provider has policies and procedures in place to protect children from harm.
- A risk assessment will be carried out prior to the work experience
- The person of contact at the place of work will be sent a letter which sets out our expectations of student behaviour and expectations of the place of work.

- The child will be informed what behaviour to expect from the staff at the place of work experience and what the staff should not do. The child will be informed that they should contact the DSL and the member of NCS staff arranging work experience if anything happens that makes them feel uncomfortable.
- Work experience will only go ahead with parental consent. Parents will be made aware that their child will not be supervised by NCS staff and that their child will come into contact with adults who do not have DBS checks.
- If the person supervising the child during the work experience will provide more than 3 days in a 30 day period, this qualifies as regulated activity, so the NCS will ensure this person is not on the barred list.
- If the work experience involves our student working in a 'specified place' such as another school or sixth form college, then the work experience provider is responsible for considering whether they require an enhanced DBS check for our student.

The flow chart below details the DBS checks which should be carried out:



Annex Five: Weapons in College

1. Introduction

While the majority of young people stay within the law a small number do find themselves getting involved in knife and gun crime.

Whilst there is no excuse to carry a weapon, people carry knives and guns for different reasons:

- Protection
- Self-defence
- Fear
- Peer Pressure
- To gain respect, power or control.

Not all people who carry weapons intend to use them but if you are carrying a weapon a situation is more likely to get out of hand.

Carrying a knife or gun is illegal in the U.K and the courts will take firm action if you're found with either in your possession.

The Metropolitan Police Service has set up a dedicated taskforce to combat knife crime under Operation Blunt. This operation features community engagement, education and enforcement. London Borough of Newham police, through the Safer Schools Partnership and Safer Neighbourhoods work with schools, Sixth Forms and colleges to raise the profile of knife crime among young people, challenging the perception that carrying a knife increases personal safety.

<https://www.gov.uk/government/policies/reducing-knife-gun-and-gang-crime>

As a Sixth Form we will work with London Borough of Newham police to ensure that students and staff are protected and that the carrying of offensive weapons is discouraged through continued education, discussion and proactive enforcement.

The Violent Crime Reduction Act 2006 introduced a power for designated members of school staff to search students for weapons. This is a specific power that builds on the powers under the Education Act 1996 to enable staff to have control of students and the use of force where necessary.

The use of 'Screening Arches' and Wands in conjunction with the Safer School or Safer Neighbourhood officer would be used at the direction of the Principal. Their use could be used as a visible deterrent or to prevent escalation of previous incidents.

It is the role of the NCS to inform students and parents of the possibility of the powers under the Violent Crime Reduction Act 2006 being exercised.

2. Staff discovering or identifying students carrying an Offensive Weapon

The college will follow the guidance on pages 8 and 16 from the NPCC: 'When to Call the Police'.

Unless there are exceptional circumstances, the police will be informed of any incidents where a student is found in possession of a knife or other offensive weapon (an offensive weapon is an article that is made, adapted or used for causing injury). Involvement of the police would be in accordance with protocol detailed in sections 9.6 – 9.17 'Working with the Police' of this policy and would always involve considering the safety and wellbeing of the child in possession of the weapon.

The college would also seek to inform parents where a student is found in possession of an offensive weapon. The only reason this would not take place is if it is believed that by informing parents it could increase risk.

Where weapons come into staff possession, they must be securely retained for prompt collection by the Police Officer dealing with the matter. The details should be recorded on an incident report or log including:

- Circumstances
- Witnesses
- Action Taken

The member of staff taking possession of the weapon from a student should be available to give a police statement regarding the seizure.

3. Police and Sixth Form action

The decision on proceedings (whether to arrest or not) will be a joint one involving the police and the Sixth Form. The decision will be informed by a number of factors surrounding the young person. These may include:

- Available evidence
- Previous incidents at the school
- Police information
- Family history
- Prevalence of offence in local area
- Attitude of young person
- Age of young person

Where a decision is made to arrest, the offender will be required to attend the police station, either by direct arrest or subsequent appointment.

The 'suspect' will be interviewed at the police station regarding their alleged possession of the weapon. The Police will then furnish all evidence to the Crown Prosecution Service who will then make a decision regarding judicial disposal.

There are disposal options open to juveniles (under 18 years):

- No Further Action
- Warn the suspect in accordance with the Reprimand or Final Warning scheme (this leads to a referral to the Youth Offending Team)
- Charge the young person who will then be required to attend court

The suspect could also be bailed to return to the police station for further enquiries to be carried out.

The offence disposal decision will be based upon the student's previous offending history, details of the specific incident and any other mitigating circumstances that need to be considered.

4. Exclusion from Sixth Form

The Sixth Form will respond to different knife crimes with different measures in the interests of proportionality.

- Intimidation of a weapon – Permanent
 - Possession / carriage of weapon – Permanent
 - Threat with a weapon (seen) – Permanent
 - Threat with a weapon (not seen) – Permanent
 - Injury caused to another by use of a weapon – Permanent
 - **If a student is charged with an offence – permanent**
-
- **Post exclusion support (where not permanent)** – Where appropriate restorative justice meetings between all parties will take place. Diversionary support for the perpetrator from the police, youth offending service and the local authority can also be accessed.
 - **Child protection considerations** – The Designated Safeguarding Lead and police must consider any child protection/ safeguarding issues that are associated with the knife incident, this will not prevent the Sixth Form permanently excluding a student where there is a reasonable risk to students and staff from the young person or his affiliates.

Annex Six: Use of Images and Videos of Students by the NCS

This section applies to the use of any film and electronic photographic equipment. This will include mobile phones, tablet computers, music players and gaming devices with in-built cameras as well as other forms of digital technology and resources for storing and printing images.

1. Legislation and Consent

The General Data Protection Regulation (GDPR) 2018 affects the official use of photography by all educational settings. This is because an image of a child is considered to be personal data and it is a requirement that parental consent is obtained for any photographs or video recordings.

At the NCS, parental consent is sought on entry to the Sixth Form and is current at any time whilst a student remains on roll at the Sixth Form by signing the 'New Intake Data Collection Sheet' that includes the section below that describes the purpose of the sixth form's use of images and video:

The use of Student Photographs and Voice Recording for Research:
We will use photographs of our students around the Sixth Form, in newsletters, our websites or any other marketing materials. In some circumstances we will share marketing material with partners that we work with for their own marketing purposes. Please tick the box below if you consent to your child's photograph being shared as part of our partners marketing material.

Images of students for which consent has never been given are not to be used, unless the specific consent of the parent or carer is obtained. Should it not be possible to obtain such consent, then images must be returned to the individual concerned or destroyed. If two parents disagree over consent for their child to appear in photographs or video recordings, then it is treated as if consent has not been given.

Images will not be taken of any student against their wishes. A student's right not to be photographed must be respected.

2. Capture and Storage of Images and Video

Staff must not capture images or videos of students on any personal device, mobile phone, iPads etc. In exceptional circumstances, a personal device may be used where permission is obtained from a member of the leadership team. The following protocol must be followed:

- Images and video are saved initially on the device only - photo/video backup to cloud storage must be disabled before images are captured
- Images must not be taken through an 'app' (Instagram, Snap Chat etc.)
- Files must be transferred to the secure staff intranet as soon as practicable and by the end of the next working day at the latest
- Once transferred, original files must be removed from a personal device immediately

3. Planning to Capture Images and Video in the Sixth Form Setting

The taking of images of a student in a one to one situation with an adult is not accepted practice as such situations are likely to be perceived as sensitive, intrusive and open to misinterpretation.

Staff must always ensure that they capture images of students in suitable dress, and take care photographing events to maintain modesty. Photography is not permitted in sensitive areas such as the toilets.

Annex Seven:

Job Description: Designated Safeguarding Lead and Deputies

The Position of Designated Safeguarding Lead (DSL) and Deputy Designated Safeguard Leads

- The Governing body has appointed an appropriate senior member of staff, from the Senior Leadership Team, to the role of designated safeguarding lead. The DSL is Olga Markoulides, Assistant Principal.
- The DSL will take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring).
- The DSL will have the appropriate status and authority within the sixth form to carry out the duties of the post. They will 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 interagency meetings – and/or to support other staff to do so, and to contribute to the assessment of children
- Deputy safeguard leads have been appointed and will be trained to the same standard as the designated safeguarding lead. The deputy safeguard lead is Rebecca Pinfield (Assistant Principal).
- Whilst the activities of the DSL can be delegated to the deputy, the ultimate lead responsibility for child protection, as set out above, remains with the DSL; this lead responsibility will not be delegated.

Key Roles:

Managing referrals

The DSL 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; and
- refer cases where a crime may have been committed to the Police as required. (The DSL will use the guidance in 'NSPCC – When to call the police' to decide when calling the police is appropriate)

Work with others

The DSL is expected to:

- act as a source of support, advice and expertise for all staff.
- act as a point of contact with the safeguarding partners;
- liaise with the Principal, Ms Lomax, to inform her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and Police investigations, including being aware of the

requirement of children to have an appropriate adult (see Section 9: Multi-agency work: Working with Police)

- as required, liaise with the “case manager” and the designated officer(s) at the local authority designated officer (LADO) for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, IT technicians, First Aiders, with the Matthew Squire (Assistant Principal) as the named person for oversight for SEN and Mental Health Leads) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with Principal and other appropriate members of staff to ensure children with a social worker receive the academic support required and where necessary have reasonable adjustments to aid their welfare and academic progress

Raising Awareness

The DSL should:

- ensure the college’s child protection policies are known, understood and used appropriately;
- ensure the college’s child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies 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 safeguarding partner arrangements to make sure staff are aware of training opportunities and the latest local policies on safeguarding arrangements;
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing or have experienced, with teachers and college leadership staff.
- ensure staff know who vulnerable children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort, supporting staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Training

- The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated at least every two years.
- The DSL should undertake Prevent awareness training.
- In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:
 - are able to keep detailed, accurate, secure written records of concerns and referrals;
 - Understand the assessment process for providing early help and intervention, including criteria for action and local authority children’s’ social care referral arrangements.
 - 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 school or child protection policy and procedures, especially new and part time staff;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand the importance of information sharing, both within the college and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst online at college;
- can recognise additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them.

Child protection file

Child protection records will be stored securely in a central place separate from academic records. The main file will clearly show an alert that a child protection file exists and the location of this (red dot). Individual files will be kept for each child who has safeguarding needs: The Sixth Form will not keep family files. Files will be kept for at least the period during which the child is attending the Sixth Form, and beyond that, in line with current data legislation and guidance.

Access to these records by staff other than by the DSL will be restricted and a written record will be kept of who has had access to them and when.

Where children leave the sixth form (including for in-year transfers), the DSL will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days. This will be transferred separately from the main student file, ensuring secure transit (via "Special/Recorded Delivery") and confirmation of receipt should be obtained. The DSL will ensure that key staff are aware of any safeguarding and child protection information of any in-year transfers. We will record where and to whom the records have been passed and the date. This will include the child's name, date of birth, where and to whom the records have been sent and the date sent and/or received.

If a student is permanently excluded, child protection records will be forwarded on to the relevant organisation.

Annex Eight: Remote Access Safeguarding Policy

Children at the NCS will only be offered Remote Access to lessons in accordance with government guidelines or in a student specific circumstance which is approved by the Principal.

Safeguarding priority

We acknowledge that only having Remote Access to school and education can be challenging for students. The safeguarding of all children at the NCS remains the priority during such situations. The following fundamental safeguarding principles remain the same:

- the best interests of children continue to come first
- if anyone in our college has a safeguarding concern, they will act immediately
- a designated safeguarding lead (DSL) or deputy DSL will always be available
- no unsuitable people will be allowed to gain access to children
- children should continue to be protected when they are online.

Safeguarding partners' advice

We continue to work closely with our three safeguarding partners and we will ensure this annex is consistent with their advice. This will include expectations for supporting children with education, health and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need. The current advice is below.

Children's Social Care and Safeguarding have created staffing arrangements to maintain an open service focusing on the children:

- All open cases have been triaged to provide a service effectively during this time.
- Increased use of video calling to have direct and visual contact with children, parents and carers. Social Care staff are following PHE guidelines regarding safe contact.
- Implementation of a rotation of staff working from home and maintaining a service at Beckton Road and Dockside to maximise our service resilience.
- Implementation of priority status system in place to adjust the level of service offered in line with the capacity.
- Early Help staff are used to maximise impact and reach for the families and for older children, the support that is available through the youth empowerment service.
- MASH will continue to function, there are no changes to the system of making referrals for safeguarding services as this is a priority 1 function so if all else cannot be provided safeguarding will be maintained. There are regular conversations with operational and leadership staff in our partner agencies to ensure that the safeguarding response is as multi-agency as we can reasonably deliver. If you are concerned by delay in response to safeguarding please escalate using the usual process i.e. MASH@newham.gov.uk this email box is read by social work managers.
- Contact details of safeguarding partners have been shared with the DSL.

Roles and responsibilities

The roles and responsibilities for safeguarding at the NCS remain in line with our Child Protection Policy.

Where the college is closed due to a lockdown the DSL and at least one deputy DSL will be available by phone and/or email and their contact details have been shared with Newham Local Authority.

The designated safeguarding lead (DSL) for child protection is Olga Markoulides

Contact details: email: omarkoulides@ncs6.org

The deputy designated lead is Rebecca Pinfield

Contact details: email: rpinfeld@ncs6.org

Vulnerable children

Vulnerable children include those who have a social worker and those children with education or health care (EHC) plans.

Those who have a social worker include children who have a child protection plan and those who are looked after by the local authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989. Senior leaders in our school, especially the DSL (and deputies) know who our most vulnerable children are, and they have the flexibility to offer a place to those on the edge of receiving children's social care support.

We will continue to work with children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children.

Those children identified as vulnerable by the DSL will be contacted weekly by the DSL or a member of SLT/Pastoral Team to ascertain wellbeing, safety and academic progress. Additional support will be out in place, where appropriate.

All children will be continuing their education remotely with lessons being taught via Microsoft Teams.

Increased vulnerability or risk

Our staff will be aware of the mental health of children and their parents and carers and will contact the DSL or a deputy if they have any concerns.

Attendance

Attendance and punctuality systems continue to be operated remotely. A register is taken for each lesson and the attendance officer continues to monitor attendance and contact parents/carers and students when there are absences. If contact cannot be made, the DSL or a deputy DSL will be informed. The DSL or a deputy will attempt to contact the parents through various methods, such as telephone and email. If contact cannot be made or if the DSL or a deputy DSL deems it necessary, we will undertake a home visit or ask an appropriate agency to do so. A risk assessment will be carried out before any such visit is made to ensure staff the family are not put at risk.

Reporting concerns about children or staff

The importance of all staff acting immediately on any safeguarding concerns remains. Staff will continue to follow our Child Protection procedures and advise the DSL of any concerns they have about any child (as outlined in the NCS safeguarding policy).

The varied arrangements in place as a result of a college closure and remote learning taking place do not reduce the risks that children may face from staff. As such, it remains extremely important that any allegations of abuse made against staff attending our college are dealt with thoroughly and efficiently and in accordance with our Allegations Against Staff Policy) as outlined in the Safeguarding Policy).

Staff training and induction

For the duration of lockdown measures, our DSL and deputy DSLs are unlikely to receive their refresher training. In line with government guidance, our trained DSLs and deputy DSLs will be classed as trained even if they cannot receive this training.

All current college staff have received safeguarding training and have read Part One of Keeping Children Safe in Education. When new staff are recruited, they will receive a safeguarding induction in accordance with our Child Protection Policy.

Safer recruitment/volunteers and movement of staff

When recruiting new staff, we will continue to follow our Safer Recruitment policy.

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

For volunteers we will continue to follow the checking and risk assessment process set out in paragraphs 305 to 312 of Keeping Children Safe in Education 2023. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to engage in regulated activity.

Child-on-child abuse

We recognise that children can abuse their peers and our staff are clear about the college's policy and procedures regarding child on child abuse. All child on child abuse is unacceptable and will be taken seriously. We also recognise that abuse can still occur during a closure.

Our staff will remain vigilant to the signs of child-on-child abuse and will follow the process set out in our Child Protection Policy, which can be accessed here on the college website.

Online safety

It is likely that children will be using the internet and engaging with social media far more during periods of lockdown. Our staff are aware of the signs of cyberbullying and other online risks. All lessons are being taught remotely using Microsoft Teams and Safeguarding protocols and guidance has been issued to staff before the closure and is reiterated frequently.

Staff who interact with children online will continue to look out for signs a child may be at risk. If a staff member is concerned about a child, that staff member will follow the approach set out in the safeguarding policy and report that concern to the DSL or to a deputy DSL.

Our staff will follow the process for online safety set out in our Child Protection Policy.

Emerging need

Where the DSL has identified a child to be on the edge of social care support, or who would normally receive additional pastoral support in college, they will ensure that a communication plan is in place to support that child. Details of that plan will be recorded in the safeguarding file for that child. It will be reviewed regularly to ensure it remains current during these measures.

Annex Nine: Filtering and Monitoring

(See Meeting digital and technology standards in schools and colleges, March 2023)

Filtering and monitoring are important parts of safeguarding pupils and staff from potentially harmful and inappropriate online materials. More details regarding our filtering and monitoring procedures can be found in the NCS E-Safety Policy.

Matthew Squire, Deputy Principal is the member of SLT who has responsibility for filtering and monitoring together with the DSL.

Annex Ten: Abbreviations

Abbreviation	What it stands for
DSL	Designated Safeguarding Lead
HBA	Honour Based violence
HSB	Harmful Sexual Behaviour
KCSIE	Keeping Children Safe in Education
LAC	Looked after children
PACE	Police and Criminal Evidence Act (1984) – Code C
SPOC	Single point of contact
SVSH	Sexual violence and sexual harassment between children in schools and colleges
UKCIS	UK Council for Internet Safety
VSH	Virtual School Head
WTTSC	Working together to safeguard children

Annex Eleven: National Documents relevant to this policy

Name of document	Published by	Date of publication (or most recent update)	Where it can be accessed
Keeping Children Safe in Education	Government	31 May 2022	https://www.gov.uk/government/publications/keeping-children-safe-in-education--2
Behaviour in Schools	Government	Sept 2022	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101597/Behaviour_in_schools_guidance_sept_22.pdf
Child sexual exploitation: definition and guide for practitioners	Government	Feb 2017	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf
Education inspection framework	Government	Sept 2023	https://www.gov.uk/government/publications/education-inspection-framework/education-inspection-framework-for-september-2023
Managing risk of radicalisation in your education setting	Government	24 Oct 2022	https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting
Meeting digital and technology standards	Government	29 March 2023	https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-

in schools and colleges			schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges
Police and Criminal Evidence Act (1984) – Code C	Government	4 Nov 2020	https://www.gov.uk/government/publications/pace-code-c-2019
Prevent Duty Guidance for England and Wales	Government	1 April 2021	https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales
Sexual violence and sexual harassment between children in schools and colleges	Government	1 Sept 2021	https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges
Sharing Nudes and Semi-Nudes	UK Council for Internet Safety	Dec 2020	https://inege.com/wp-content/uploads/2021/01/UKCIS_sharing_nudes_and_semi_nudes_advice_for_education_settings_V2.pdf
Suspension and Permanent Exclusion from maintained schools, academies and pupil referral units in England	Government	May 2023	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1162401/Suspension_and_permanent_exclusion_guidance_May_2023.pdf
The Right to Choose: Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage	Government	Feb 2023	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1153014/English_version_contents_page_updated_14.04.23.pdf
When to call the police: Guidance for schools and colleges	National Police Chief's council		https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf
Working together to safeguard children	Government	1 July 2022	https://www.gov.uk/government/publications/working-together-to-safeguard-children--2
Working together to improve school attendance	Government	August 2023	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1099677/Working_together_to_improve_school_attendance.pdf