



THE CITY OF
LEICESTER
COLLEGE

Safeguarding and Child Protection Policy 2022-2023

(Incl. Whistleblowing Policy & Low-Level Concerns Policy)

Safeguarding is defined as protecting children from maltreatment, preventing impairment of physical and mental health and/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 life chances.





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Head Teacher:	<i>KDV</i>	
Chair of Governors:	<i>J S Andrews</i>	

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The City of Leicester College Safeguarding Team

	<p>John Andrews (Chair of Governors) - Safeguarding Link Governor</p>
	<p>Jill Walton (Senior Deputy Headteacher) – Designated Safeguarding Lead / Senior Mental Health Lead</p>
	<p>Karena Anderson (Senior Deputy Designated Safeguarding Lead)</p>
	<p>Ken Vernon (Head Teacher) – Senior Deputy Designated Safeguarding Lead</p>
	<p>Harriet Hurdley-Lees (Deputy Headteacher) – Senior Deputy Designated Safeguarding Lead</p>



Amy Lidbury (Assistant Headteacher) – Deputy Designated Safeguarding Lead



Warren Drury (Assistant Headteacher) – Deputy Designated Safeguarding Lead



Chris Dakin (Assistant Headteacher) – Deputy Designated Safeguarding Lead

Additional Key members of the TCOLC Safeguarding Team

Charlotte Loasby/Amisha Patel – Designated Teacher for SEND

Lisa Tailby – Attendance Welfare Officer

Jude Atkinson – Local Authority Designated Officer

1. Introduction

1.1 The City of Leicester College fully recognises the contribution it can make to protect children and support students in college. Safeguarding and promoting the welfare of children is **everyone's** responsibility. Everyone who comes into contact with children and their families has a role to play. To fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. Our establishment has a culture of vigilance, we take a whole college approach to safeguarding and promoting the welfare of children and we consider, at all times, what is in the best interest of the child and young person. We endeavour to identify concerns early, provide help for children, promote children's welfare, take into consideration the child's lived in experience and prevent concerns from escalating.

The aim of this policy is to safeguard and promote our student's welfare, safety and health by fostering an honest, open, caring and supportive climate and our staff members working with students to maintain an attitude of **'it could happen here'** where safeguarding is concerned. This policy sets out how the college and the governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are students at the college.

Safeguarding and promoting welfare of children is defined as:

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

1.2 No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. **The City of Leicester College** is committed to safeguarding and promoting the welfare of all its students. We believe that:

- All children/young people have the right to be protected from harm &
- Children/young people need to be safe and to feel safe in college;
- This means our staff consider, at all times, what is in the best interest of the children/ young people
- Children/young people need support which matches their individual needs, including those who may have experienced abuse;
- All children/young people have the right to speak freely and voice their values and beliefs;
- All children/young people must be encouraged to respect each other's values and support each other;
- All children/young people have the right to be supported to meet their emotional, and social needs as well as their educational needs – a happy healthy sociable child/young person will achieve better educationally;
- The staff within our college are prepared to identify children and young people who may benefit from Early Help intervention
- Colleges can and do contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk-taking behaviours; and
- All staff and visitors have an important role to play in safeguarding children and protecting them from abuse.

1.3 The City of Leicester College will fulfil local and national responsibilities and accepted best practice as laid out in the following documents: -

- Working Together to Safeguard Children 2018 (Rev Dec 2020)
- Keeping Children Safe in Education: Statutory guidance for colleges and colleges (DfE Sept 2022)
- What To Do If You Are Worried a Child Is Being Abused March 2015
- Education and Training (Welfare of Children) Act 2021

- Sexual violence and sexual harassment between children in colleges and colleges (DfE Sept 2021)
- The College Staffing (England) Regulations 2009 & Amended Regulations 2015; Safer Recruitment in Education including
 - Guidance for Safer Working Practice 2019 (Rev April 2022) Safer Recruitment consortium
 - Prevent Duty 2015
 - Information sharing: Advice for Practitioners providing safeguarding services to children, young people parents and carers. (March 2015)
 - Leicester Safeguarding Children’s Partnership Board (LSCPb)
 - The Children Act 1989 and 2004
 - The Education Act 2002 s175/s157
 - Mental Health and Behaviour in Colleges: Departmental Advice (DfE 2018)
 - Framework for the Assessment of Children in Need and their Families 2000
 - Sexual Offences Act 2003 (Position of Trust offence)
 - Voyeurism (Offences Act) 2019
 - Childcare (Disqualification) Regulations 2009
 - Counter Terrorism and Security Act 2015
 - Female Genital mutilation Act 2003/Updated regulations July 2020
 - Safeguarding & Child Protection education procedures in Leicester, notes, information, and training for Designated Safeguarding Leads (DSL) in colleges
 - Children and Families Act 2014
 - Safeguarding and Vulnerable Group Act 2006
 - Sharing Nudes and Semi Nudes (December 2020)– UK Council for Internet Safety
 - Searching, screening and confiscation at college Rev July 2022

1.4 The Governing Body takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our college to identify, assess, and support those children who are suffering harm.

1.5 We recognise that all staff and governors have a full and active part to play in protecting our students from harm, and that the child’s welfare is our paramount concern.

1.6 All staff¹ believe that our college should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

2 Overall Aims

- This policy will contribute to safeguarding our students and promoting their welfare and mental health by supporting the child’s development in ways that will foster security, confidence and resilience at the same time considering the best interest of the child.
- Providing an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties
- Raising the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- Ensure our staff identify concerns early, provide help for children, promote children’s welfare and prevent concerns from escalating.
- Providing a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the college, contribute to assessments of need and support plans for those children including Child Missing from Education.
- Acknowledging the need for effective and appropriate communication between all members of staff in relation to safeguarding students.

¹ ‘Staff’ Covers ALL adult staff on site, including temporary, supply and ancillary staff, and volunteers working with children

- Developing a structured procedure within the college which will be followed by all members of the college community in cases of suspected abuse.
- Developing effective working relationships with all other agencies involved in safeguarding children including Early Help and intervention
- Work within the curriculum raising awareness of and promoting safeguarding, to our children/young people including online safety inside and outside of establishment
- Ensuring that all adults within our college who have access to children have been checked as to their suitability. This includes other community users of our facilities.

3 Key processes

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately. Our college procedures for safeguarding children are in line with the *Leicester City Safeguarding Children's Partnership Board (LSCPB), Multi Agency Child Protection/Safeguarding Procedures*; (<https://llrscb.proceduresonline.com/>), in addition to the statutory requirements as outlined in 1.3.

4 Expectations

4.1 All staff and visitors will be familiar with this safeguarding policy.

- Staff will have access to, a copy of, and be well versed in our Child Protection Policy, which will also form part of their induction and revisited annually through Whole College Safeguarding Training.
- Be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc.
- For those regular external visitors/providers such as cleaners and caterers; to have shown the college a copy of their H & S and Child Protection Guidelines as best practice and where applicable; and that the college has a statement in main reception notifying external visitors who the College's DSL is and what to do if they have any concerns about a child's welfare
- Be involved in the implementation of individual education programmes, integrated support plans, child in need plans and interagency child protection plans;
- Be alert to signs and indicators of possible abuse (Appendix 1)
- Staff understand that 'harm' can include 'witnessing harm to others' for example cases of domestic abuse
- Record concerns/disclosures and give the record to the DSL;
- Deal with a disclosure of abuse from a child in line with our college procedures; informing the DSL immediately and provide a written account as soon as possible. This includes making the appropriate contact with children's social care (DSL).
- Record safeguarding information using college procedures whether electronic or in paper form

4.2 All parents will be familiar with this safeguarding policy.

- Parents/Cares will have access to the Child Protection Policy as part of initial information given to perspective/existing Parents/Carers and will be available through our college's website. Additional copies will be issued as and when required including notifying parents of changes within the document i.e., revised annual policy.

4.3 Communicating with parents:

In addition to section 4.2 above, the following statement is provided and highlighted to parents, so they are aware of the college's responsibilities:

The City of Leicester College ensures children learn in a safe, caring and enriching environment. Children are taught how to keep themselves safe, on and offline, to develop positive and healthy relationships and how to avoid situations where they might be at risk including by being exploited.

The City of Leicester College has a statutory responsibility to share any concerns it might have about a child in need of protection with other agencies and in particular police, health and children's services. The College is not able to investigate concerns but has a legal duty to refer them. In most instances, the college will be able to inform the parents/carer of its need to make a referral. However, sometimes the college is advised by Children's Social Care or police that the parent/carer cannot be informed whilst they investigate the matter. We understand the anxiety parents/carers understandably feel when they are not told about any concerns from the outset. The college follows legislation that aims to act in the best interests of the child.

5 Extended college / Before and after college activities

5.1 Where the governing body provides services or activities directly under the supervision or management of college staff, the college's arrangements for child protection will apply.

5.2 Where services or activities are provided separately by another body, the governing body should seek assurance in writing that the body concerned has appropriate policies and procedures in place to safeguard and protect children and there are arrangements to liaise with the college on these matters where appropriate.

6 Procedures

6.1 The City of Leicester College will ensure that:

- The governing body understands and fulfils its safeguarding responsibilities.
- We have a Designated Safeguarding Lead, three Senior Deputy Designated Safeguarding Leads as well as three identified Deputy Designated Deputy Safeguarding Leads for child protection and safeguarding, who have undertaken DSL training delivered by Safeguarding in Education, Leicester City Council; of which their training will be refreshed every two years.
- All members of staff are provided with opportunities **annually** to receive Safeguarding Training by the Safeguarding in Education team in order to develop their understanding of safeguarding and child protection in particular the signs and indicators of abuse.
- All members of staff, volunteers, and governors know how to respond to a student who discloses abuse, and the procedure to be followed in appropriately sharing a concern of possible abuse or a disclosure of abuse.
- All parents/carers are made aware of the college's responsibilities in regard to child protection procedures through publication of the college's Safeguarding and Child Protection Policy, and reference to it in our prospectus/brochure and home college agreement.
- Our Premises Hire policy will seek to ensure the suitability of adults working with children on college sites at any time.
- Community users organising activities for children are aware of and understand the need for compliance with the college's child protection guidelines and procedures.
- The City of Leicester College is committed to safer recruitment as outlined in Keeping Children Safe in Education 2022. The college will ensure all appropriate checks are carried out for all staff and volunteers including online searches as part of due diligence. Appropriate checks will be recorded on the Single Central Record which will be audited termly by the Headteacher, Ken Vernon and Senior Deputy Headteacher, Jill Walton. The college will ensure at least one person who is safer recruitment trained will be part of the recruitment process. All volunteers will undergo a risk assessment.

- All governors / proprietors / trustees will undergo a DBS check and a Section 128 direction check as outlined in Keeping Children Safe in Education 2022
- The name of any member of staff considered not suitable to work with children will be notified to either the Disclosure and Barring Service or the relevant Government Department/Agency (where appropriate), depending on the nature of the concern, with the advice and support of the Local Authority Designated Officer (LADO), and that a member of our SLT has attended LADO training (Managing allegations against staff members) and understands the harms threshold/low level concerns thresholds as set out in KCSIE 2022
- Our procedures will be annually reviewed and updated and ratified by the Governing Body / Proprietors / Trustees.
- The name of the Designated Safeguarding Lead, Senior Deputy Designated Safeguarding Leads and Deputy Designated Safeguarding Leads will be clearly shown in the college, with a statement explaining the college's role in referring and monitoring cases of suspected abuse. (Reception, Staff room, Website etc.).
- All adults, (including supply teachers, non-teaching staff and volunteers), new to our college will be given or directed to a copy of; our Safeguarding and Child Protection Policy, Staff Code of Conduct, the college's behaviour policy, the college's child missing protocols, a copy of Keeping Children Safe in Education 2022 Part 1 and Annex B, and the name and contact details of the Designated Safeguarding Lead will be explained as part of their induction into the college. In addition to this, all such staff and volunteers will be made aware of the 'Guidance for safer working practice for those working with children and young people in education settings, 2020 (Safer Recruitment Consortium).²

7 Responsibilities

7.1 All our staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. 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 will not prevent our staff from having a professional curiosity and speaking to the DSL(s) if they have concerns about a child. Our staff will also determine how best to build trusted relationships with children and young people which facilitate communication.

We understand that our responsibility to safeguard children requires that we all appropriately share any concerns as soon as a staff member or volunteer suspects/knows of a concern that we may have about children. The first point of contact is the DSL or other members of the Safeguarding Team (in their absence). The DSL will inform the Headteacher of any referrals to be made. If the concern is in regard to the conduct of a staff member the report is made to the Headteacher. If the concerns is regarding the Headteacher then the Chair of Governors should be informed.

7.2 If a staff member feels they cannot disclose information to their DSL, Headteacher or Governor(s), they must then follow our colleges whistleblowing procedures to report their concerns. (Appendix 7 – The City of Leicester Whistleblowing Policy)

7.3 All staff will be versed in our Whistleblowing procedure, understand when it is appropriate to use the procedures and will be given details of the NSPCC whistleblowing helpline.

² <https://saferrecruitmentconsortium.org/>

7.4 All staff will be well versed in the college's Child Missing protocols and know and understand that any child that is regularly absent or missing can be a cause for concern and a possible indicator that the child is at risk of abuse or in need of help and support - The City of Leicester College's Designated Safeguarding Lead, Jill Walton, Deputy Designated Safeguarding Lead, Amy Lidbury and Attendance Welfare Officer, Lisa Tailby will take the lead in ensuring staff at The City of Leicester College follow the appropriate policies procedures, guidelines. Where there is cause for concern these leaders will direct swift and effective action, including home visits, communication with parents/carers and if required inform relevant agencies, such as, the police, Education Welfare and Children's Social Care of their concerns.

8 The Designated Safeguarding Lead (DSL) – Roles and Responsibilities³

8.1 Keeping Children Safe in Education September 2022, Annex C, outlines specific responsibilities of a DSL (A member of the College's Leadership Team) and their responsibilities within this role. Our lead DSL will take lead responsibility for safeguarding and child protection (including online safety). This is also explicit in their job description. We also have a number of Senior Deputy Designated Safeguarding Leads and Deputy Designated Safeguarding Leads who are trained to the same standard and provide the same level of support. Their key areas of responsibilities include: -

Manage Referrals:

- Refer cases of suspected abuse and neglect to children's social care/police
- Support staff who make referrals to local authority
- The Channel programme where there is a radicalisation concern and support staff with this
- Cases in relation to allegations against staff members to LADO including disclosure and barring
- Cases where any crime may have been committed to the Police

Working with Others:

- 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 headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult
- As required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- Liaise with staff (especially teachers, pastoral support staff, college nurses, IT Technicians, senior mental health leads and special educational needs co-ordinators (SENCOs), or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children

³[Keeping children safe in education 2022 \(publishing.service.gov.uk\)](#) - Annex C, Role of Designated Safeguarding Lead

in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at college or college. This includes:

- ensure that the college or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
- support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information sharing and managing child protection files

Our DSL(s) are responsible for ensuring that our child protection files are kept up to date. The information is kept confidential and stored securely. Our records will contain the following information:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome
- Transfer child protection files (including in year transfers) to the new college or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term, ensuring secure transit and confirmation of receipt will be obtained

Our DSL(s) will ensure the file is only accessed by those who need to see it and where the file or its contents are shared, this happens in line with information sharing advice outlined government guidance KCSIE 2022.

Raising Awareness

- Ensure each member of staff (new and part-time) has access to and understands our child protection policy and procedures
- Ensure our child protection policy is reviewed annually, updated, and reviewed regularly, and work with our governing bodies/ proprietors regarding this
- Ensure our 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 or college in this (section 4.3 above)
- Link with the safeguarding partners ensuring our staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a Social Worker are experiencing, with teachers and college and college leadership staff

Training Knowledge and Skills

- Understand the assessment process for providing early help and statutory intervention, and social care referral arrangements
- Have a working knowledge of how local authorities conduct a child protection case conference/review conference and attend to these effectively
- Understand the importance DSL(s) has in providing information and support to children social care in order to safeguard and promote the welfare of children

- 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 disabilities (SEND), those with relevant health conditions and young carers
- Understand the importance of information sharing, both within the college and college, and with the safeguarding partners, other agencies, organisations and practitioners
- Understand and support the college or college staff with regards to the requirements of the Prevent duty and protecting children from the risk of radicalisation;
- Are able to understand the unique risks associated with online safety and be confident to keep children safe whilst they are online at college or college
- Recognise additional risks that children with (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- Obtain access to resources and attend any relevant or refresher training courses
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the college or college may put in place to protect them.

In addition to the formal training set out above, our DSL(s) knowledge and skills are regularly at regular intervals refreshed to allow them to understand and keep up to date with any developments relevant to their role.

Providing support to staff

- Ensure our staff are supported during the referrals processes
- Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support

Understanding the views of children

It is important that children feel heard and understood. Therefore, our DSL(s) designated safeguarding leads will be supported in developing knowledge and skills to:

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the college or college may put in place to protect them
- Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication

Holding and sharing Information

Our DSL(s) will be equipped to:

- Understand the importance of information sharing, both within the college and college, and with other colleges and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UKGDPR)
- Be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping

Availability

- During term time, our DSL(s) will always be available on college site. The college will arrange adequate and appropriate cover arrangements for any out of hours/out of term activities and trips and in exceptional circumstances, availability will be made via mobile phone and or Microsoft Teams.

8.2 Roles and responsibilities of the Headteacher

The Headteacher of The City of Leicester College will ensure that:

- The policies and procedures adopted by the governing body are fully implemented, and followed by all staff:
- Specifically, the Safeguarding & Child Protection Policy, Behaviour Policy, Staff Code of Conduct, LADO Procedures, child on child Abuse/Sexualised Behaviour Policy, Safer Recruitment Policy and other relevant policies are updated annually, ratified by the Governing body annually and that policies are available publicly either via the college website, parents evening, open evenings or by other means
- That staff undergo and attend annual Whole College Safeguarding Training (INSET)
- That all staff undergo appropriate online safety training
- That all staff receive regular updates in relation to safeguarding, child protection and online safety
- Sufficient resources and time are allocated to enable DSL's and other staff to discharge their responsibilities, including taking part in inter-agency meetings and contributing to the assessment of children
- That the Headteacher is aware of Local Authority Designated Officer (LADO) processes regarding allegations about other staff members, specifically the 'harms' and 'low-level concerns' thresholds
- That the Headteacher has attended LADO Training and refreshed no later than every 2 years
- That the Headteacher has attended Safer Recruitment Training and that training is refreshed no later than every 5 years; and that at least 1 member of the Governing body has attended Safer Recruitment Training
- All staff and volunteers feel able to raise concerns about poor or unsafe practice with regard to children and processes, and such concerns are addressed sensitively and effectively in a timely manner. (Whole college approach, child centred practice and culture of vigilance)
- All staff consider the best interest of a child and are made aware that they have an individual responsibility for referring child protection concerns, promptly and using the proper channels.
- All staff have an understanding of Early Help and have the ability to identify children who would benefit from Early Help intervention.
- Those regular external visitors/providers such as cleaners, caterers have shown the college a copy of their H & S and Child Protection guidelines as best practice and where applicable; and that the college has a statement in main reception notifying external visitors who the Colleges DSL(s) are and what to do if they have any concerns about a child's welfare
- The DSLs undergo safeguarding and child protection training, which is updated regularly, with advice from the LSCPB, Safeguarding in Education and in line with Keeping Children Safe in Education, September 2022, Annex C
- New members of staff, temporary or permanent including volunteers are given a full induction that includes Safeguarding and Child Protection Guidelines and names of DSL(s).
- All staff are made aware of their right to whistleblow, have a copy of the whistleblowing procedures, are well versed with the procedures and have been made aware of the NSPCC whistleblowing helpline. (Appendix 7 – The City of Leicester College Whistleblowing Policy)

8.3 Roles and responsibilities of the Governing Body

The City of Leicester College Governing body have a strategic leadership responsibility for our college's safeguarding arrangements and comply with their duties under legislation. Our governing body ensures policies, procedures and training in our college are effective and comply with the law at all times. Our Lead Governor for Safeguarding is John Andrews.

We also will ensure that all our governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. The training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our college/colleges are effective and support the delivery of a robust whole college approach to safeguarding. Our governors and trustees training will be regularly updated.

Furthermore, the governors of our college will ensure that:

- Our college has a Safeguarding and Child Protection Policy and procedures in place, and the policy is made available to parents on request and available on the college website:
<https://www.cityleicester.co.uk/home/key-information/policiesgdpr/>
- That all college staff members working with children consider the best interests of children and are advised to maintain an attitude of *'it could happen here'* where safeguarding is concerned
- There is a senior member of the college's leadership team who is designated to take lead responsibility for dealing with child protection – Our Lead DSL at The City of Leicester College is, Jill Walton (Senior Deputy Headteacher)
- There is both Senior Deputy and Deputy Designated Safeguarding Leads appointed for child protection, in the event of the unavailability of the Lead DSL
- Where there is a safeguarding concern, the Governing Body/ College Leadership Team will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide for them
- That systems are in place, place, well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback
- The DSL and the appointed deputy(s) for child protection undertakes training for designated safeguarding leads, in addition to inter-agency child protection training, that is provided by, or to standards agreed by, LSCPB, and attends refresher DSL training at two-yearly intervals
- That clear systems and processes are in place for identifying and responding to potential mental health problems to a child including routes to escalate, referrals and accountability systems
- The Headteacher, and all other staff and volunteers who work with children, undertake appropriate training which is kept up to date through Whole College Training (annually); and that new staff, temporary staff and volunteers who work with children are made aware of the college's arrangements for child protection and their responsibilities. (Through the induction process)
- The Headteacher, and all other staff and volunteers who work with children, undertake appropriate online safety training
- There are procedures for dealing with allegations of abuse against members of staff and volunteers (LADO) and that the thresholds for allegations (Harms Thresholds/Low Level Concerns) against staff and volunteers are understood and reported appropriately by all staff members. (Appendix 3 Procedures/Guidance; Managing Allegations (LADO))

- That Code of Conduct is up to date, maintained and adhered to by staff so as not to bring the college into disrepute
- The chair of governors (or, in the absence of a chair, the vice chair) deals with any allegations of abuse made against the Headteacher, in liaison with the Local Authority Designated Officer. (Appendix 3)
- That at least 1 member of the Governing body has attended LADO Training as a minimum and is refreshed regularly
- That at least 1 member of the Governing Body has attended Safer Recruitment Training as a minimum and is refreshed regularly
- The governing body, nor individual governors will have a role in dealing with individual cases or a right to details of cases except when exercising their disciplinary functions in respect of allegations against a member of staff
- Any deficiencies or weaknesses brought to the attention of the governing body are rectified
- Policies and procedures are reviewed annually, and information is provided to the Local Authority on how the governing body discharges its duties regarding safeguarding and child protection.
- There is an individual member of the governing body who will champion and lead on issues to do with safeguarding children and child protection within the college, liaise with the DSL, and provide information and reports to the governing body, and that person is appropriately trained to discharge their responsibilities effectively. Our colleges Lead Governor for Safeguarding is John Andrews.
- Will ensure that college creates a culture of safe recruitment and, as part of that, adopts recruitment procedures that help deter, reject or identify people who might abuse children (Part three: Safer Recruitment, Keeping Children Safe in Education September 2022).
- That the Chair of the governing body completes the Annual Safeguarding Return– supporting colleges to exercise their duties in relation to Safeguarding & Child Protection and return the document to the local authority in a timely manner
- That there is a Lead Governor for Antbullying and behaviour in the college. Our lead is John Andrews
- That there is a Lead Governor for Mental Health in the College. Our lead is John Andrews

Our Governing Body will ensure they facilitate a whole college approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies will operate with the best interests of the child at their heart.

9 Supporting Children

Some children may need a social worker due to safeguarding or welfare needs. Children may need this help for various reasons and their experiences of trauma and abuse can lead them to becoming more vulnerable or educationally disadvantaged. When receiving information from the Local Authority that a child has a social worker, our DSL(s) will use this information so that decisions can be made in the best interest of a child's safety and welfare, as routine. Our DSL(s), where appropriate, will share information accordingly with relevant partner agencies to safeguard and promote the physical and mental health wellbeing of any child. In addition to this.

- We recognise that a child who is abused, who witnesses violence or who lives in a violent environment may feel helpless and humiliated, may blame him/herself, and find it difficult to develop and maintain a sense of self-worth
- We recognise that the college may provide the only stability in the lives of children who have been abused or who are at risk of harm
- We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal, too aggressive or being withdrawn

9.1 Our college will support all students by:

- Taking into account a child's wishes when determining what action to take and what services to provide when dealing with a safeguarding concern
- That systems are in place, well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback
- Encouraging the development of self-esteem and resilience in every aspect of college life including through the curriculum
- Identifying children who are in need of extra mental health support which includes working with external agencies
- Promoting a caring, safe and positive environment within the college
- Ensuring children are taught to recognise when they are at risk and know how to get help when they need it. Both, physically, mentally, and online.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children including Early Help
- Notifying Children's Social Care as soon as there is a significant concern
- Ensuring that a named teacher is designated for Looked After Children/Children in Need (LAC & CIN) and that an up-to-date list of LAC/CIN is regularly reviewed and monitored
- Providing continuing support to a student (about whom there have been concerns) who leaves the college by ensuring that such concerns and college medical records are forwarded under confidential cover to the Headteacher and Lead DSL at the student's new college as a matter of urgency
- Working with partner agencies to support and safeguard children within; Early Help, Children in Need, Child Protection and Looked After Children
- Our Governors and college staff will ensure that children are taught about how to keep themselves and others safe, including online. We recognise that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities. Aspects include:
 - healthy and respectful relationships
 - boundaries and consent
 - stereotyping, prejudice and equality
 - body confidence and self-esteem
 - how to recognise an abusive relationship, including coercive and controlling behaviour
 - the concepts of, and laws relating to- sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support, and
 - what constitutes sexual harassment and sexual violence and why these are always unacceptable

10 Confidentiality

We recognise that all matters relating to child protection are confidential and the best interest of a child should be considered at all times. However, The Data Protection Act 2018 and 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. Our staff and practitioners (may) share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. *It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk.*

10.1 The Headteacher or DSL will disclose personal information about a student to other members of staff on a need-to-know basis only. Staff will be informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to deal with an individual student/family. A written record will be made of what information has been shared, with whom, and when.

10.2 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

10.3 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's own safety or well-being, or that of another child as this may ultimately not be in the best interest of the child.

10.4 We will always undertake to share our intention to refer a child to Children's Social Care with their parents/carers consent unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with the Children's Social Care, Duty & Advice Service.

11 Supporting Staff

11.1 We recognise that staff working in the college who have become involved with a child who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting.

11.2 We will support such staff by providing an opportunity to talk through their anxieties and concerns with the DSL and to seek further support where necessary. This could be provided by, for example, the Headteacher, supervision arrangements, by Occupational Health and/or a teacher/trade union representative as appropriate.

11.3 We understand that staff should have access to advice on the boundaries of appropriate behaviour. Guidance for safer working practice for those working with children and young people in education settings, 2019/2020 (Safer Recruitment Consortium).⁴ provides advice on this and the circumstances which should be avoided, in order to limit complaints against staff of abuse of trust, and/or allegations of physical or sexual abuse. These matters form part of staff induction and are referred to in the staff handbook/code of conduct.

11.4 We recognise that DSLs should have access to support (as in 11.2) and appropriate workshops, courses or meetings as organised or arranged through the Local Authority/LSCP B

12 Allegations against staff

12.1 All college staff including supply staff, should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

12.2 All staff including supply staff should be aware of the college's Behaviour for Learning Policy and Staff Code of Conduct

12.3 All staff including supply staff should be aware of the Guidance for Safer Working Practices for Adults who work with Children and Young People 2019/2020⁵

12.4 All staff as part of their annual safeguarding training will receive Online Safety Training and will sign the Acceptable Use Agreement. This sets out responsibilities for all staff, ensuring they have an up-to-date

⁴ <https://saferrecruitmentconsortium.org/>

⁵ <https://saferrecruitmentconsortium.org/>

awareness of online safety and that all digital communications with students/parents/carers should be at professional level and only carried out using official college systems.

12.5 We understand that a student may make an allegation against a member of staff.

12.6 If such an allegation is made, the member of staff receiving the allegation will immediately inform the Headteacher or the most senior teacher, likely to be the Senior Deputy Headteacher, if the Headteacher is not present.

12.7 The Headteacher/Senior Deputy Headteacher on all such occasions will immediately discuss the content of the allegation with the Local Authority Designated Officer (LADO) and follow the process for managing the concern laid down in the LSCP Procedures (<https://lrs.cb.proceduresonline.com/>). In addition to this, the Headteacher is aware of the harms thresholds and difference between low level concerns and harms as set out in KCSIE 2022 and within the colleges 'Managing Allegations Procedures'. (Appendix 3)

12.8 If the allegation made to a member of staff concerns the Headteacher, the person receiving the allegation will immediately inform the Chair of Governors who will consult with Children's Social Care, LADO, without notifying the Headteacher first. (0116 454 2440)

12.9 On all occasions identified in 12.7 & 12.8 above, the college will follow the LSCP/Local Authority procedures for managing allegations against staff and volunteers, a copy of which can be found in the College's Managing Allegations Policy (Appendix 3).

12.10 Suspension of the member of staff against whom an allegation has been made needs careful consideration, and we will consult (as in 12.8 above) in making this decision.

12.11 In line with this policy and other college procedures for incident reporting/recording, staff and students may provide accounts of events, which will be stored under our own secure systems and may be produced in the event of any allegation. However, such accounts must not constitute an official statement and the reporting person must not be questioned over their disclosure at this stage.

12.12 Our Premises Hire agreement for other users requires that the organiser will manage the suspension of adults where necessary from college premises.

12.13 Our college staff, including supply staff, are aware of and have an understanding of our 'Guidelines for Avoiding Allegations of Abuse' as outlined in Appendix 4.

12.14 Our college staff, including supply staff and volunteers, understand their responsibilities in raising an allegation against another staff member, following local authority and LSCP guidance and procedures

13 Whistleblowing

13.1 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

13.2 All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues. If necessary, they should speak to the Chair of Governors or the Local Authority Designated Officer.

13.3 All staff are aware of and understand how to use our college's whistleblowing procedures. (The City of Leicester Whistleblowing Policy Appendix 7)

13.4 All staff have access to the NSPCC Whistleblowing Helpline

14 Our role in the prevention of abuse

14.1 We recognise that the college plays a significant part in the prevention of harm to our students by providing students with effective lines of communication with trusted adults, supportive friends and an ethos of protection.

14.2 The college community will therefore:

- Establish and maintain an ethos, which is understood by all staff, which enables children to feel secure and encourages them to talk knowing that they will be listened to. This includes considering the best interest of a child and maintaining the ethos of *'it could happen here'*
- Ensure that all children know there is an adult in the college whom they can approach if they are worried or in difficulty.
- We will provide opportunities for students to develop skills, concepts, attitudes and knowledge that promote their safety and well-being.
- Relevant issues will be addressed through the PSHE and RHSE curriculum, for example self-esteem, emotional literacy, assertiveness, power, sex and relationship education, mental/physical health, online safety and bullying.
- Relevant safeguarding issues will be addressed through other areas of the curriculum, for example, TCOLC Character tutor programme, time, English, History, Drama, Art, ICT (includes online and offline safety)
- Other areas of work
- All our policies which address issues of power and potential harm, for example bullying, equal opportunities, handling, positive behaviour, will be linked to ensure a whole college approach.
- Our safeguarding policy cannot be separated from the general ethos of the college, 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.

15 Safeguarding students who are vulnerable to extremism

15.1 Since 2010, when the Government published the Prevent Strategy⁶ and (Revised Prevent Duty Guidance 2015⁷), 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 City of Leicester College 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 City of Leicester College is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

⁶ Prevent Strategy 2011 - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf & CONTEST Strategy 2011 - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97994/contest-summary.pdf

⁷ Revised Prevent Duty Guidance 2015 <https://www.gov.uk/government/publications/prevent-duty-guidance>

Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix 5.

15.4 The City of Leicester College seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to religious ideologies, or to Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist extremist and Animal Rights movements.

15.5 Local Context: Leaders and DSLs have knowledge and understanding of the college's local context and how this context increases the risks that our students may face. Due to our local context, students may be at increased risk to the following:

- Islamic ideology
- Hindu and Muslim local community unrest

15.5 Risk reduction

15.6 The college governors, the Headteacher and the DSLs for Safeguarding will assess the level of risk within the college and put actions in place to reduce that risk. Risk assessment may include consideration of the college's PSHE curriculum, SEND policy, assembly policy, the use of college premises by external agencies, integration of students by gender and SEN, anti-bullying policy and other issues specific to the college's profile, community and philosophy.

15.7 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 DSL in the first instance

15.8 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.

15.9 Our staff have undergone Prevent Awareness Training and understand the steps to follow, via discussions with the DSL, if a referral to the Channel Programme is required

16 Contextual Safeguarding, Assessment of Risk Outside The Home, Extra Familial Harms (Child Criminal Exploitation)

16.1 CCE is a form of abuse and occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal activity. Safeguarding incidents and CCE can be associated with factors outside the college and/or can occur between children outside of these environments.

The City of Leicester College staff especially our designated safeguarding lead (and deputies) will take into consideration whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

This is known as contextual safeguarding and assessment of risk outside the home, which simply means The City of Leicester College staff will take into consideration wider environmental factors that may be present in a child's life that are a threat to their safety and or welfare. This way, colleges and colleges are able to provide as

much information as possible as part of the referral process to Children's Social Care as necessary. Environmental factors within Contextual Safeguarding include but not exclusive to.

17 County Lines & Child Financial Abuse

17.1 Criminal exploitation of children is a widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. County Lines is a term used when drug gangs from big cities expand their operations to smaller towns, often using violence to drive out local dealers and exploiting children and vulnerable people to sell drugs.

17.2 Common features in county lines drug supply is the exploitation of young and vulnerable people. The dealers will frequently target children and adults - often with mental health or addiction problems - to act as drug runners or move cash so they can stay under the radar of law enforcement.

17.3 People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business.

17.4 We might not immediately think of children when we hear the words 'financial fraud.' But the reality is that more and more young people are finding themselves the victims of financial exploitation. Being groomed online to open bank accounts and launder criminal money. This is known as Child Financial Abuse (CFB). Criminals befriend young people through social media and online games. They offer them gifts, promise easy money, gaming credits, skins or cryptocurrency. Once they've gained a young person's trust, they force them to carry out fraudulent activities, like opening a bank account for them. This is financial exploitation.

18 Serious Violence, Gang Violence & Youth Crime

18.1 A gang is group of individuals that spends time in public and engages in criminal activity and violence. The group may also be territorial or in conflict with other gangs. Young people involved in gangs have an increased risk of experiencing violence and other types of abuse including sexual exploitation. Gang crime and serious youth violence is also often synonymous with knife crime and other serious violence.

18.2 The vast majority of young people and education establishments will not be affected by serious violence or gangs. However, where these problems do occur there will almost certainly be a significant impact.

18.3 Gangs specifically target children who have been excluded from college to groom them as drug dealers in towns across the UK. Exclusion from college appears to be a highly significant trigger point for the escalation of County Lines involvement for children who might be on the fringes of such activity or who are easily manipulated.

19 Knife Crime

19.1 Knife crime has been receiving countrywide attention after being recognised as a contemporary national threat in the UK. There have been a number of high-profile incidents where teenagers have been

killed or injured by someone using a knife as a weapon. Knife crime simply put is any crime that involves a knife. This includes:

- carrying a knife or trying to buy one if you're under 18
- threatening someone with a knife
- carrying a knife that is banned
- a murder where the victim was stabbed with a knife
- a robbery or burglary where the thieves carried a knife as a weapon

Within Leicester, May 2019 saw 237 reported incidents involving a knife or bladed instrument which was an increase of 30 from the previous month

20 Child Criminal Exploitation and Cybercrime Involvement

20.1 Organised criminal groups or individuals exploit children and young people due to their computer skills and ability, in order to access networks/data for criminal and financial gain. There are a number of signs that may indicate a student is a victim or is vulnerable to being exploited which include:

- Missing from education
- Show signs of other types of abuse/aggression towards others
- Have low self-esteem, and feelings of isolation, stress or fear
- Lack trust in adults and appear fearful of authorities
- Have poor concentration or excessively tired
- Become anti-social
- Display symptoms of substance dependence
- Excessive time online computer/gaming forums
- Social Isolation in college with peers
- High functioning with an interest in computing

21 Child Criminal Exploitation and Child Sexual Exploitation (CSE)

21.1 County Lines criminal exploitation is also synonymous with Child Sexual Exploitation. Criminal activity and Gang Association can lead into CSE through situations such as initiation, peer pressure in addition to sexual favours. Although county lines is mainly criminal, all our staff are aware of the definitions of CSE, signs and impact on vulnerable children. This is further outlined in section 17.1 of this Policy.

22 Modern Slavery & Trafficking

22.1 Slavery is an umbrella term for activities involved when one person obtains or holds another person in compelled service. The number of British children identified as potential victims of modern slavery has more than doubled in a year, prompting fresh concerns about child exploitation by county lines drugs gangs.

Someone is in slavery if they are:

- forced to work through mental or physical threat
- owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse
- dehumanised, treated as a commodity or bought and sold as 'property'
- physically constrained or have restrictions placed on his/her freedom
- 'slavery' is where ownership is exercised over a person

- 'servitude' involves the obligation to provide services imposed by coercion
- 'Forced or compulsory labour' involves work or service extracted from any person under the menace of a penalty and for which the person has not offered himself voluntarily
- 'Human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.

22.2 Human trafficking

22.3 Recruitment, transportation, transfer, harbouring or receipt of persons by means of threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person; (where a child is involved, the above means are irrelevant). For the purposes of exploitation, which includes (but is not exhaustive):

- Prostitution
- Other sexual exploitation
- Forced labour
- Slavery (or similar)
- Servitude etc.
- Removal of organs

23 Child on Child Sexual Violence and Sexual Harassment

KCSIE 2022, Part 5 is explicit in their definition of Child-on-Child Sexual Violence and Sexual Harassment and its forms. However, within the context of contextual safeguarding, child on child abuse and peer influence has a massive impact on the child and young person (CYP). If CYP are exposed to other CYP who are known for being exploited, they are more likely to experience child on child abuse and be 'influenced' / 'swayed' to participate in illegal activity, criminal activity and sexual activity. Further information on Child-on-Child abuse and Sexual Violence and Sexual Harassment is outlined in our colleges guidance Appendix 6 of this Policy and within section 28 of this policy.

24 Children and the court system

24.1 Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5-11-year-olds and 12–17-year-olds. <https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds> and <https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds>

24.2 Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool <https://helpwithchildarrangements.service.justice.gov.uk/> with clear and concise information on the dispute resolution service. This may be useful for some parents and carers. If a child or young person from our college is in a situation where they are required to give evidence, college staff members will support the child and family members where appropriate.

25 Children with family members in prison

25.1 The imprisonment of a household member is one of ten adverse childhood experiences known to have a significant negative impact on children's long-term health and wellbeing, their college attainment, and

later life experiences. Children may have to take on extra responsibilities at home, including becoming young carers in some situations.

25.2 These children are at risk of poor outcomes including stigma, isolation and poor mental health. Parental imprisonment is also associated specifically with negative college experiences, such as truanting, bullying and failure to achieve in education and children of prisoners are at a higher risk of mental ill health and have an increased likelihood of experiencing poverty compared to their peers.

25.3 Approximately 200,000 children have a parent sent to prison each year and as such, **The City of Leicester College Staff** members will support children and their family members if children from our college have family members in prison. In such cases, **The City of Leicester College** will remain non-judgemental and supportive towards the child and family so that they can achieve the best whilst in our environment. Furthermore, if a parent or carer finds themselves in this situation, we encourage you to speak with our DSL so that support can be given as necessary.

26 Homelessness

26.1 Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Our DSLs are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity if our children and family are experiencing homelessness. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

26.2 Whilst referrals and or discussion with the Local Housing Authority will be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

26.3 The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

26.4 Furthermore, The City of Leicester College staff also promote Early Help and Support so that children and families can be identified and supported at an early stage. If a parent or carer and/or their children find themselves in this situation, we strongly urge you to speak to our DSL or member of college staff so that support can be provided.

26.5 Safeguarding CYP is a local and national priority and within The City of Leicester College protecting children from abuse, harm and neglect is a priority. Our Safeguarding and Child Protection Policy along with the college's values, ethos and behaviour policies, 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. Our staff are well versed with local and national guidance and are aware of emerging safeguarding concerns that could potentially harm our children and young people:

- Our college keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities, mental health and forms of exploitation
- Our staff are supported to recognise warning signs and symptoms in relation to specific issues, and include such issues in an age-appropriate way in their curriculum
- Our staff are aware of emerging issues and contextual safeguarding and take this into consideration when assessing children and young people's needs
- Our college works with and engages our families and communities to talk about such issues
- Our college staff are supported to talk to families about sensitive concerns in relation to their children and to find ways to address them together wherever possible.
- Our DSL knows where to seek and get advice as necessary.

- Our college brings in experts and uses specialist material to support the work we do
- Our college staff fully understand how to raise a concern using the appropriate channels

26.6 As The City of Leicester College staff are aware that safeguarding issues can manifest themselves in many different ways, our staff have received annual safeguarding training and additional information to better equip themselves in the knowledge of other forms of abuse as per Keeping Children Safe in Education 2022. These are outlined in **Appendix 1**

27 Other Forms of Abuse and neglect

27.1 **Child Sexual Exploitation (CSE) & Trafficking.** CSE is a form of abuse and occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. Sexual exploitation can take many forms ranging from seemingly consensual relationships to serious gang and group exploitation.

27.2 The City of Leicester College staff are aware that sexual exploitation can take many forms and that students may not exhibit external signs of abuse. Our staff are also aware that it is an offence carrying a maximum sentence of two years imprisonment where an adult (any adult) intentionally communicates (for example, by e-mail, text message, written note or orally) with a child under 16 (whom the adult does not reasonably believe to be aged 16 or over) for the purpose of obtaining sexual gratification. This act forms part of Section 67 of the Serious Crime Act 2015⁸ (offence of Sexual Communication with a Child) and came into force on 3 April 2017.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/604931/circular-commencement-s67-serious-crime-act-2015.pdf

27.3 Therefore, our staff are vigilant for the less obvious signs, such as lots of new electronic equipment, when before there was none, seeming to have extra money to spend, moving away from established friendship groups, and the use of language appropriate/inappropriate for the child's age.

27.4 Our college staff are also aware of some of the signs and symptoms of CSE through sharing of resources, such as those from LSCB⁹, staff induction and as part of annual Whole College Safeguarding Training.

27.5 Our college staff follow guidance and procedures as outlined in 'Safeguarding Children and Young People from Sexual Exploitation in Leicester, Leicestershire and Rutland'¹⁰ available on the LSCPB website.

27.6 Our college staff are aware that if a disclosure is raised in reaction to CSE, that it will be reported straight to the DSL/SLT or Duty & Advice in their absence.

27.7 Sharing Nudes & Semi Nudes (formally Sexting) can also form part of CSE both online and offline

27.8 Child sexual exploitation can occur in different ways and in different situations. Many young people are 'groomed' by their abuser, online or face-to-face. Grooming is an action deliberately undertaken with the aim of befriending and establishing an emotional connection with a child, to lower the child's inhibitions with the intention to sexually abuse them.

27.9 Groomers will hide their true intentions and may spend a long time gaining a child's trust through a range of mediums including social media platforms. Section 67 of the Serious Crime Act 2015 (offence of Sexual Communication with a Child) which came into force on 3 April 2017 also applies to Sexting, Sharing

⁸ <https://www.gov.uk/government/publications/circular-201701-sexual-communication-with-a-child-implementation-of-s67-of-the-serious-crime-act-2015>

⁹ <https://www.lcitylscb.org/safeguarding-leaflets/>

¹⁰ <https://www.lcitylscb.org/safeguarding-leaflets/>

Nudes and Semi Nudes (including videos and live streams) and grooming and our staff are fully aware of the legislation¹¹.

Grooming Models include.

- The relationship / peer model
- Organised / network model & trafficking model
- Inappropriate relationship model
- Gangs model
- Online Gaming / Social Networks

27.10 Our staff are aware of the types of grooming which take place, including grooming models through their annual safeguarding training and information from our DSL.

27.11 Sharing Nudes or Semi Nudes/Sexting is when someone sends or receives a sexually explicit text, image or video or use of live stream. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. This can be via child on child or other adults. As recently as June 2017, figures show there have been more than 4,000 cases since 2013 where children have taken explicit pictures of themselves and sent them to others, the youngest being 5 years old and research from Child Line suggest six out of ten teenagers say they have been asked for sexual images or videos. It is illegal to possess, take or distribute sexual images of someone who is under 18, even if the young person under the age of 18 has taken the image themselves and passed it on themselves.

The City of Leicester College takes a zero-tolerance approach if children are found to be sending sexual images of themselves or others whether intentionally or maliciously in our college. The City of Leicester College has a duty of care to inform the Police and Children's Social Care if such a case occurs. We will also notify parents directly if their children are involved. In addition to supporting our children with being safe in a digital world and highlighting the dangers, our staff have also been issued with the guidance on 'Sharing Nudes and Semi Nudes' from the UK Council for Internet Safety (Dec 2020) and have an understanding of how to handle such incidents if they arise in our college/college.

https://ineqe.com/wp-content/uploads/2021/01/UKCIS_sharing_nudes_and_semi_nudes_advice_for_education_settings_V2.pdf

27.12 The City of Leicester College staff follow college procedures in reporting such concerns and promote E Safety and dangers of Sharing Nudes, Sexting, Grooming and CSE through TCOLC Character lessons, PSHE and assemblies. Our students are taught how to keep safe on and offline and E Safety is promoted throughout the college and home environment. Our college have also discussed local and national cases where grooming of young children has taken place such as the Kayleigh Haywood Story/Brecks Game to highlight the dangers.

27.13 Our Online safety and Acceptable Use policy is highlighted to staff, students and parents and is available on our college's website and our staff have undergone relevant online safety at induction and regularly throughout the year.

28 Child on Child Sexual Violence & Harassment including child on child Abuse/Children using Harmful Sexual Behaviour¹² (HSB)

All staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);

¹¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/604931/circular-commencement-s67-serious-crime-act-2015.pdf
^{12&17} https://llrscb.proceduresonline.com/p_sexually_harm_behav.html?zoom_highlight=children+using+abusive+behaviour

- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment
- sexual activity without consent
- consensual and non-consensual of sharing nudes and semi nudes/sexting
- Upskirting
- initiation/hazing type violence and rituals

28.1 Sexual violence and sexual harassment¹³ can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

28.2 Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBTQ children are at greater risk. Some risks can be especially compounded where children who are LGBTQ lack a trusted adult with whom they can be open with. Our staff therefore understand and endeavour to reduce any additional barriers faced and provide a safe space for our children to speak out or share their concerns.

28.3 The City of Leicester College takes child on child abuse/Child on Child Sexual Violence & Harassment seriously and we understand that some children are more vulnerable to physical, sexual and emotional bullying and abuse by their peers. In our college, this kind of abuse will always be taken as seriously as abuse perpetrated by an adult and as seriously as a child who is suffering or likely to suffer significant harm.

28.4 Our staff understand that a significant proportion of sexual related offences are committed by teenagers, and, on occasion, such offences are committed by younger children. Our staff therefore understand not to dismiss some abusive sexual behaviour as 'normal' between young people and not to create high thresholds in such cases before appropriate action is taken.

28.5 Our staff will respect confidentiality and anonymity of a child or young person reporting incidents of sexual violence and sexual harassment including situations where the child or young person asks staff not to tell anyone about the incident, making referrals against the wishes of the young person and considering the potential impact of social media breaching confidentiality. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies.

28.6 Our lead DSL (or a senior deputy/deputy) will endeavour to balance the victim's wishes against their duty to protect the victim and other children. If the lead DSL (or a senior deputy/deputy) decide to make a referral to local authority children's social care and/or a report to the police against the victim's wishes, our DSL and staff will handle all incidents extremely carefully, and the reasons will be explained to the victim, appropriate specialist support will be offered taking into consideration the best interest of the child at all times.

28.7 Where incidents of sexual violence and harassment have been raised, our staff, where applicable, will take into consideration the impact on siblings and understand the importance of intra familial harms.

28.8 Staff and carers of children living away from home need clear guidance and training to identify the difference between consenting and abusive, and between appropriate and exploitative peer relationships. Our college will provide information, guidance and training to relevant staff members to support them with this.

¹³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014224/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf

28.9 Children and young people who abuse others should be held responsible for their abusive behaviour, while being identified and responded to in a way that meets their needs as well as protecting others and our college has clear guidelines around this.

28.10 Our college also refers to the LSCPB procedures¹⁴ which are written with particular reference to sexually abusive and inappropriate behaviours. Keeping Children Safe in Education 2022 (Part 5) also makes reference to Child-on-Child Sexual Violence & Sexual Harassment and where there are serious child protection concerns, as a result of non-sexual violence by a child or young person, leading to actual or possible significant harm, our safeguarding and child protection measures will be implemented.

29 Upskirting

29.1 Upskirting is the act of taking a photograph of underneath a person's skirt without their consent. It is often performed in a public place; public transport or on an escalator, with crowds of people making it harder to spot people taking these photos. It could also happen on the way to and from college and within a college. Being victim to such an incident can cause emotional distress for the young child or young person involved. The City of Leicester College staff take these types of incidents seriously and our staff are aware of the law against 'Upskirting' which came into force on April 12, 2019, in England and Wales. If our staff are made aware of such incidents, the colleges will follow its safeguarding procedures in addition to seeking advice from the Police.

29.2 At The City of Leicester College, all our staff are aware of the importance of:

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

29.3 If our staff have a concern that a child might have been abused by another child and/or is displaying inappropriate sexualised behaviour, staff will in the first instance refer their concerns to the DSL. The DSL will then directly contact Children's Social Care/DAS in accordance with the LSCPB Referrals Procedure to decide how the incident will be managed. Furthermore, our DSL will also seek advice from the Police where necessary. Our staff are aware of what child abuse and Sexual Violence/Harassment is at national and local levels through our annual Whole College Training and our DSL has attended CUSAB Training delivered by Safeguarding in Education to enhance their knowledge in this area further.

30 Domestic Violence and Abuse & Violence between young people (Teen relationships)

30.1 The cross-government definition of domestic violence and abuse is¹⁵:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

¹⁴ https://lscpb.proceduresonline.com/p_sexually_harm_behav.html?zoom_highlight=children+using+abusive+behaviour

¹⁵ <https://www.gov.uk/guidance/domestic-violence-and-abuse>

30.2 There have been a number of high profile cases both locally and nationally where domestic violence and abuse has had a significant and direct impact on the child and their mental health and wellbeing. If the college is made aware of incidents of domestic violence which is impacting on a child within the college, (suspicions and allegations of abuse, harm and significant risk to a child), the college will follow Local Authority and Leicester Safeguarding Board guidelines in reporting such concerns to Children's Social Care, Duty and Advice or the Police and will also seek further guidance where necessary.

30.3 Domestic abuse is not limited to adults; there is an increasing awareness of violence from one teenager to another;

- 1 in 5 teenage girls have been assaulted by a boyfriend
- Young women are more likely to experience sexual violence than other age groups
- Young women with older partners are at increased risk of victimisation
- Recent surveys (including NSPCC¹⁶, Zero Tolerance and End Violence Against Women campaign) reveal that approximately 40% of our young people are already being subjected to relationship abuse in their teenage years

30.4 If The City of Leicester College is made aware of children behaving this way with other children within our college, and violence is apparent between the young people's intimate relationship; this includes issues around the use of social media and Sexting, we will view this as a significant child welfare concern and where necessary, the appropriate agencies will be informed. This includes Children Social Care and the Police.

30.5 If such cases are prevalent within our college, whether the incident involves Adult Relationships or Teen Relationships, the college will also work closely with the child and the Headteacher/DSL will endeavour to support the child who has been exposed to this type of violence and abuse with the involvement of (where appropriate) their parents/carers and their boyfriend/girlfriend.

30.6 Furthermore, involvement through Operation Encompass and Early Help can also support the child and parents/carers. The college will ensure communications and multiagency working with Social Care and Early Help is maintained to fully support the child and their family. (Victims). Staff will also work with all the children in our college to ensure information and the importance of healthy relationships is highlighted through assemblies, circle time and PSHE/RSHE lessons.

31 Child Missing from Education

31.1 A Child Missing from Education forms part of the wider LSCPB procedures¹⁷ for children who go missing from College, Home or Care Education and includes Families who go missing.

31.2 A student missing from education on a number of occasions is a potential indicator of abuse and neglect.

31.3 Should a student go missing from The City of Leicester College our Attendance Welfare Officer, Lisa Tailby, will inform the DSL/SLT and contact the Educational Welfare Service. The DSL will consider further actions and/or support should it be required and ensure they help identify any risk of abuse and neglect, including sexual exploitation and to help prevent the risks of them going missing in future.

¹⁶ [New report shows scale of abuse against teenagers | NSPCC](#)

¹⁷ <https://llrscb.proceduresonline.com/index.htm>

31.4 At The City of Leicester College if a child is no longer coming to our college where the parent/carer has removed them, we will ensure that appropriate steps are taken and measures are in place. I.e., we will follow our college guidelines in monitoring those parents/carers home tutoring, follow procedures where a child is taken out of college to go on holiday or where a child is removed from college as the family are moving away.

31.5 We will notify all relevant partner agencies/services including Education Welfare, correct forms will be completed, information will be recorded, and child folders/information will be passed on to the appropriate person (where applicable).

32 Honor based Abuse (HBA)

32.1. Honour-based Abuse is a term that embraces a variety of crimes of violence (mainly but not exclusively against women) including domestic abuse, which is perpetrated in the name of so called 'honour'. The honour code which it refers to is set at the discretion of male relatives and women who do not abide by the 'rules' are then punished for bringing shame on the family. Infringements may include a woman having a boyfriend; rejecting a forced marriage; pregnancy outside of marriage; interfaith relationships; seeking divorce, FGM, forced marriage, abuse linked to faith and culture, breast ironing, inappropriate dress or make-up and even kissing in a public place.

32.2 HBA can exist in any culture or community where males are in position to establish and enforce women's conduct. However, males can also be victims, sometimes as a consequence of a relationship which is deemed to be inappropriate, if they are gay, have a disability or if they have assisted a victim.

33 Female Genital Mutilation

33.1 Female Genital Mutilation is an illegal operation under the Female Mutilation Act 2003, it is a form of child abuse and as such, is dealt with under the college's Child Protection & Safeguarding Policy.

33.2 Definition of Female Genital Mutilation¹⁸ (FGM):

FGM comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reasons.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. Therefore, our staff have been briefed on the importance of FGM through our Whole College Safeguarding training in October 2022 and are aware of some of the signs and symptoms.

Responding to FGM - The college will ensure;

- We raise awareness of staff in regard to the issues of FGM through Whole College Training
- Staff have a clear understanding of what FGM is
- FGM is within the colleges Safeguarding Policy
- Sex and Health curriculum supports students understanding of their bodies and keeping themselves safe
- Monitoring absences

¹⁸ FGM Revised Guidance July 2020 - <https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

33.3 As of October 2015, it became a mandatory responsibility of all staff members to report any suspicion of FGM to the police if the child is under 18 years of age. If any of our staff at The City of Leicester College are aware of such concerns, staff will, in the first instance, report their concerns to the DSL and/or Headteacher and then take appropriate steps to either, directly contact the Police or seek advice from Duty & Advice, Children's Social Care.

33.4 Any concerns raised including any referrals made will be monitored closely and recorded following our college's procedures by the staff members raising the concern, the DSL or both.

33.5 Furthermore, our college staff are aware that guidance on FGM has been updated in July 2020 and the guidance is available to all staff.

34 Forced Marriage

34.1 A forced marriage is a marriage that is performed under duress and without the full and informed consent or free will of both parties. Duress cannot be justified on religious or cultural grounds. Victims of forced marriage may be the subject of physical violence, rape, abduction, false imprisonment, enslavement, emotional abuse, and murder. It is important not to confuse 'forced' marriage with 'arranged' marriage. In the instance of an 'arranged' marriage both parties freely consent.

34.2 The Government's definition of a Forced Marriage¹⁹ is:

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

34.3 The City of Leicester College staff, through induction and Whole College Training are aware of the importance and impact on a child/student who is involved in such situations.

34.4 In addition, the Forced Marriage Unit have issued guidance on Forced Marriage and vulnerable adults due to an emerging trend of cases where such marriages involving people with learning difficulties. This is not a crime' which is perpetrated by men only, sometimes female relatives will support, incite or assist. It is also not unusual for younger relatives to be selected to undertake the abuse as a way to protect senior members of the family. Sometimes contract killers and bounty hunters will also be employed

34.5 In such cases, disclosures and concerns relating to Forced Marriage/Honour Based Abuse will be reported directly to the DSL / the Police due to the impact it could have on the child/student in the wider community. Information will be sought from Children's Social Care Duty & Advice and where appropriate and Police and the Forced Marriage Unit.

35 Abuse linked to faith, beliefs and culture

35.1 Child abuse is never acceptable in any community, in any culture, in any religion, under any circumstances. However, some children are subject to certain kinds of child abuse linked to their faith, belief or culture and this includes abuse that might arise through a belief in spirit possession or other spiritual or religious beliefs.

This kind of abuse can also include:

¹⁹ <https://www.gov.uk/guidance/forced-marriage>

- Belief in the concept of witchcraft, magic or voodoo
- Demons or the devil acting through children or leading them astray
- The evil eye or djinns and dakini
- Ritual or muti murders
- Breast Ironing
- Female Genital Mutilation
- Honour based violence and Forced Marriage
- Chastisement of a child in a Place of Worship

35.2 Whilst this is not an exhaustive list, The City of Leicester College recognises that sadly, such cases are on the increase within the community and as a college, we take such incidents as seriously as any other kind of abuse perpetrated by an adult on a child.

35.3 If the college has been made aware of such a case, the college will follow LSCP procedures and where appropriate, report the incident to Children Social Care and/or the Police.

35.4 As a college, our staff are aware of some of the signs of this kind of abuse and have attended training to support them further. We also work closely with all our children to promote healthy relationships and British Values. Our code of conduct (Children/Teachers/Parents & Carers), also teaches our children mutual respect of other faith, beliefs and cultures in a positive manner rather than negative. We believe and respect each other in our college and maintain this ethos throughout the teaching and learning environment.

36 Early Help and Supporting Children and their Families

36.1 Early Help and prevention is about how different agencies work together to help children, young people and their families at any point in their lives to prevent or reduce difficulties. This 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.

36.2 At The City of Leicester College, key staff members and DSL's have attended our LSCP's Early Help and Early Help Assessment Training, and our staff are prepared to identify any children who may benefit from Early Help. (signpost/refer accordingly).

37 Bullying and Safeguarding

37.1 **The Law** - Some forms of bullying are illegal and should be reported to the police. These include:

- violence or assault
- theft
- repeated harassment or intimidation, for example name calling, threats and abusive phone calls, emails or text messages
- hate crimes

37.2 Bullying is defined as 'behaviour by an individual or group, usually repeated over time, which intentionally hurts another individual or group either physically or emotionally'. Repeated bullying usually has a significant emotional component, where the anticipation and fear of being bullied seriously affects the behaviour of the victim.

37.3 It can be inflicted on a child by another child or an adult. Bullying can take many forms (for instance, cyber-bullying via text messages or the internet), and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, or because a child is adopted or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.

37.4 The City of Leicester College has a legal duty to ensure we have an Anti-Bully Policy in place and that all staff, children and parents/carers are made aware of it. This document can be accessed on our college's website <https://www.cityleicester.co.uk/home/key-information/policiesgdpr/> and sets out clear procedures in managing such incidents within the college. We also deliver work in college about anti-bullying through assemblies and lessons and our staff are trained in appropriately dealing with such incidents.

37.5 However, at times, bullying such as child on child abuse; sexualised behaviour, serious incidents of harm, homophobic behaviours, cyber bullying and Sexting/Use of mobile phones may occur and will be taken seriously and as a serious safeguarding concern especially if the child is at risk of significant harm. In such cases, our Designated Safeguarding Lead and the Headteacher will assess the situation and seek advice and guidance from Children's Social care or the Police especially in relation to illegal activity.

38 Local Priorities

38.1 Within Leicester City, the Local Authority and LSCPB has have their own priorities which reflect the area in which The City of Leicester College is based. Some of these include being aware of Knife Crime, Gang Related Issues, Radicalisation, County Lines, Criminal Activity, Antisocial Behaviour, FGM and Contextual Safeguarding. (This is not an exhaustive list).

38.2 Within our local community area, our priorities are:

- Priority/Awareness of Harmful Sexual Behaviours
- Priority/Awareness of online safety
- Priority/Awareness of mental health and wellbeing
- Priority/Awareness of Child Criminal Exploitation
- Priority/Awareness of Knife Crime
- Priority/Awareness of Gang Related Issues
- Priority/Awareness of Serious Violent Crime
- Priority/Awareness of Radicalisation

38.3 Our SLT, DSL's and staff are aware of these priorities, and we aim to raise awareness through a whole college approach and staff training to ensure our children and young people are aware of such issues and that we implement the correct policies and procedures to ensure that our children and young people are safe within college and within the community we serve. We work closely with other agencies including the Police, Community Groups and Social care and where appropriate, Parents and Carers will also be a part of this whole college and whole community approach process.

39 Private Fostering

39.1 A private fostering arrangement is one that is made without the involvement of the local authority to look after a child under the age of 16 (or under 18 if disabled) by someone other than a parent or close relative, for 28 days or more and can include those living with extended family members. So, this could be a child living with people as stated below:

Private Fostering includes a child living with:	Private Fostering does not include a child living with:
Godparents	Mother/Father
Great Grandparents	Brothers/Sister
Great Aunts or Uncles	Grandparents

Family Friends	Aunts/Uncles
Stepparents where a couple isn't married or in a civil partnership	Stepparents where a couple is married or in a civil partnership
Cousins	Children and young people who are being looked after by the Authority.
A host family which is caring for a child from overseas while they are in education here	

39.2 It's a legal duty (Children Act 1989) for parents or the private foster carer to notify the local authority of whenever a child is not living with a close relative. This should be done six weeks before the arrangement takes place or immediately if it is unplanned or already happening. This is so the local authority can work with private foster carers to keep children safe and also support anyone who is privately fostering.

39.2 The City of Leicester College staff are aware of what Private Fostering is and staff in our college understand their legal duty under the Children Act 1989 to notify the Local Authority/Children's Social Care, they are made aware of such cases. The City of Leicester College understands the apprehension some carers may feel in raising such concerns and the difficulty that some carers may have if faced with this situation. As such, the college and staff will endeavour to support the carers and the child to ensure the wellbeing of the child is maintained and help and advice is made available.

40 Online safety

40.1 Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. An effective approach to online safety empowers a college or college to protect and educate the whole college or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

The City of Leicester College takes online safety and well-being of staff and children seriously and all our staff are given safeguarding training including online safety at induction. In addition to this, all staff receive, child protection, safeguarding and online safety updates via email, e-bulletins and staff meetings at least annually to provide them with relevant skills and knowledge to safeguard children effectively. Our approach to online safety is reflected as required in all relevant policies and whilst planning the curriculum, teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views.
- **contact:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.
- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If we feel our students or staff are at risk, we will report to the Anti-Phishing Working Group

40.2 Education - The college will do everything that they reasonably can to limit children's exposure to the above risks from the college's or college's IT system. As part of this process, the college will teach children how to stay safe online using the government guidance²⁰ and other resources.

²⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811796/Teaching_online_safety_in_school.pdf

40.3 Filtering and monitoring - The college will ensure we have appropriate filters and monitoring systems in place and regularly review their effectiveness. The appropriateness of any filters and monitoring systems will be informed in part, by the risk assessment required by the Prevent Duty. The UK Safer Internet Centre has published guidance as to what “appropriate” filtering and monitoring might look like.

Guidance on e-security is available from the National Education Network.

Whilst filtering and monitoring is an important part of the online safety picture, it is only one part.

The college will consider a whole college approach to online safety. This will include a clear policy on the use of mobile technology in the college. Many children have unlimited and unrestricted access to the internet via 3G and 4G in particular and the college will carefully consider how this is managed on our premises. The policy will take into consideration the use of all handheld devices and smart watches.

40.4 Staff training - The college will ensure that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

41. Use of college or college premises for non-college/college activities

41.1 Where governing bodies or proprietors hire or rent out college or college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.

41.2 When services or activities are provided by the governing body or proprietor, under the direct supervision or management of their college or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body or proprietor should therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the college or college on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the college roll or attend the college.

41.3 The governing body or proprietor should also ensure safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

42 What we do when we are concerned about a child?

42.1 Where risk factors are present but there is no evidence of a particular risk, then our DSL/SLT advises us on preventative work that can be done within college to engage the student into mainstream activities and social groups. The DSL/SLT 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 college can work together to reduce the risk.

42.2 In this situation, depending on how worried we are and what we agree with the parent and the young person (as far as possible).

42.3 The DSL can decide to notify Duty and Advice, Early Help or Family Support Services so that a strategic overview can be maintained, and any themes or common factors can be recognised; and The college will review the situation after taking appropriate action to address the concerns.

42.4 The DSL will also offer and seek advice about undertaking an Early Help assessment and/or making a referral to Early Help services.

42.5 In addition to the above, our College staff will refer to Appendix 2 'Procedure to follow in cases of possible, alleged or suspected abuse, or serious cause for concern about a child' when dealing with a child Disclosure or an allegation of abuse.

43 Policy review

The Governing Body of our college will review the Safeguarding and Child Protection Policy annually.

44 Other Relevant Policies

The City of Leicester College Governing Body's legal responsibility for safeguarding the welfare of the children goes beyond child protection. Their duty is to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies, for instance:

- Behaviour for Learning Policy
- Attendance Policy
- Anti-Bullying and Harassment Policy Advice and Guidance
- Careers Education
- Designated Teacher for Looked After Children and Previously Looked After Children Policy
- Equality Objectives
- First Aid Policy
- Health and safety Policy
- Managing Allegations Procedure / Local Authority Designated Officer (LADO) (Appendix 3)
- Mental Health Policy
- Online Safety and Acceptable Use Policy
- Staff Code of Conduct
- Staff Handbook 2022-23
- Supporting Students with Medical Conditions Policy
- Parents Code of Conduct
- Premises Hire Policy
- PSHE/RHSE Policy
- Sexual Violence and Sexual Harassment between children in colleges and colleges (child on child) (Appendix 6)
- Special Educational Needs and Disability Policy
- School Visitor Procedures
- Whistleblowing Procedures (Appendix 7)

The above list is not exhaustive and when undertaking development or planning of any kind, The City of Leicester College and our Governors will consider the best interest of our children and any implications for safeguarding children and promoting their welfare.

45. Useful contact numbers and links

Leicestershire Police	999 / 0116 2222222
One Front Door Duty & Advice (Includes out of hours) das.team@leicester.gov.uk Early Help & Support/ early-help@leicester.gov.uk	0116 454 1004
Children's Safeguarding Unit	0116 454 2440
Safeguarding in Education Julie Chapaneri & Mohammed Patel Safeguardingineducation@leicester.gov.uk	0116 454 2440
Local Authority Designated Officer (LADO) Jude Atkinson	0116 454 2440
Leicester Safeguarding Childrens Partnership Board (LSCPB) LSCPB Home (lcitylscb.org)	0116 454 6520
Prevent (Advice / Referral) City: Ailsa Coull – Ailsa.coull@leicester.gov.uk	01164 546923 07519 069833
UAVA – United against violence and abuse (Domestic Violence, Abuse between Teenagers and Domestic Violence in BME community) info@uava.org.uk	0808 80 200 28
Forced Marriage Unit fmufco.gov.uk	020 7008 0151
Female Genital Mutilation Helpline fgmhelp@nscpsc.org	0800 028 3550
NSPCC Whistleblowing Advice Line help@nspcc.org.uk	0800 0280285

Useful websites and links
www.thinkuknow.co.uk
www.disrespectnobody.co.uk
www.saferinternet.org.uk
www.internetmatters.org
www.pshe-association.org.uk
www.educateagainsthate.com
www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation Children Forced Into Opening Criminal Bank Accounts The Children's Society (childrensociety.org.uk)

APPENDIX 1- DEFINITION AND INDICATORS OF ABUSE

Overview

Abuse, as outlined in KCSIE 2022, is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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 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 caregivers); 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
- Fabricated or Induced Illnesses (Munchausen Syndrome by Proxy)
- Stealing, scavenging and/or hoarding food
- Frequent tiredness or listlessness
- Frequently dirty or unkempt
- Often poorly or inappropriately clad for the weather
- Poor college attendance or often late for college
- 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 college; or
- The child is left at home alone or with inappropriate carers

Neglect is a priority for Leicester, Leicestershire & Rutland LSCPB. Neglect has been identified as a feature in national & local Serious Case Reviews (SCR's), local learning reviews and multi-agency audits. Our local LSCPB have developed a *Neglect Toolkit* to support practitioners identify neglect earlier in families. Key staff members and DSLs in our college are versed with this document and understand when to use it.

<http://www.lcitylscb.org/information-for-practitioners/safeguarding-topics/neglect/>

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
- Fabricated or Induced Illnesses (Munchausen Syndrome by Proxy)
- 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 a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit act of sexual abuse, as can other children.

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.

3a. SEXUAL EXPLOITATION

Child sexual exploitation occurs when a child or young person, or another person, receives “something” (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person. Sexual Exploitation can also include Grooming and Sexting.

The presence of any significant indicator for sexual exploitation should trigger a referral to children’s social care. The significant indicators are: (not an exhaustive list)

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity)
- Entering and/or leaving vehicles driven by unknown adults
- Possessing unexplained amounts of money, expensive clothes or other items
- Frequenting areas known for risky activities
- Being groomed or abused via the Internet and mobile technology; and
- Having unexplained contact with hotels, taxi companies or fast-food outlets.

5. EMOTIONAL ABUSE

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

- Soiling, smearing faeces, enuresis.

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

6. Sexual Harassment and Sexual Violence²¹

Sexual violence

It is important that college and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003¹⁰⁵ as described below:

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.

What is consent? 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

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- Sexual “jokes” or taunting
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (colleges and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.¹⁰⁸ It may include:
 - Non-consensual sharing of sexual images and videos
 - Sexualised online bullying
 - Unwanted sexual comments and messages, including, on social media; and
 - Sexual exploitation; coercion and threats

²¹[Keeping children safe in education 2022 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101311/keeping-children-safe-in-education-2022.pdf) - Part 5

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

6. RESPONSES FROM PARENTS

Research and experience indicate that the following responses from parents may suggest a cause for concern across all four categories:

- Delay in seeking treatment that is obviously needed
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- A persistently negative attitude towards the child
- Unrealistic expectations or constant complaints about the child
- Alcohol misuse or other drug/substance misuse
- Severe chastisement of a child including withholding food and using food as a form of punishment
- Parents request removal of the child from home; or
- Violence between adults in the household.

7. SEND CHILDREN (Special Educational Needs and Disabilities)

The City of Leicester College is an inclusive college and welcomes all students including those with SEND. We believe in providing every possible opportunity to enable our students to develop their full potential whilst promoting their self-esteem and valuing their individuality.

Some children have barriers to learning that mean they have special needs and require particular action by the college. Our dedicated SENCO and teachers take account of these requirements and make provision, where necessary, to support individuals or groups of children and thus enable them to participate effectively in curriculum and assessment activities.

Key issues for safeguarding children with disabilities include:

- Social isolation
- Reliance on others for personal care
- Impaired capacity to resist or report abusive behaviour
- Reduced access to someone to tell
- Especially vulnerable to bullying and intimidation
- More frequently away from home, e.g., in hospital, respite care or residential living

Our SENCO and teachers have attended appropriate training as part of their CPD; whole college safeguarding training, understand the vulnerability of SEND children and understand that SEND children may be at higher risk of abuse or neglect.

Some indicators concerns could 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 e.g., deprivation of liquid, medication, food or clothing
- Unwillingness to try to learn a child's means of communication
- Ill-fitting equipment e.g., callipers, sleep boards, inappropriate splinting; misappropriation of a child's finances
- Invasive procedures which are unnecessary or are carried out against the child's will
- A lack of knowledge about the impact of disability on the child
- A lack of knowledge about the child, e.g., not knowing the child's usual behaviour
- Not being able to understand the child's method of communication
- Confusing behaviours that may indicate the child is being abused with those associated with the child's disability
- Denial of the child's sexuality
- Behaviour, including sexually harmful behaviour or self-injury may be indicative of abuse
- Being aware that certain health/medical complications may influence the way symptoms present or are interpreted.

The City of Leicester College has a specific SEND Policy. All our staff have access to this policy and key staff members are also aware of the LSCP Procedures²² online. As best practice our college will ensure we:

- Provide starting points for the development of an appropriate curriculum
- Identify and focus attention on action to support the child within the class
- Use the assessment processes to identify any learning difficulties
- Ensure ongoing observation and assessments provide regular feedback about the child's achievements and experiences to form the basis for planning the next steps of the child's learning
- Help disabled children make their wishes and feelings known in respect of their care and treatment
- Ensure that disabled children receive appropriate personal, health, and social education (including sex education).
- Make sure that all disabled children know how to raise concerns and giving them access to a range of adults with whom they can communicate.
- Those disabled children with communication impairments should have available to them at all times a means of being heard
- Close contact with families, and a culture of openness on the part of services
- Guidelines and training for staff on good practice in intimate care; handling difficult behaviour; consent to treatment; anti-bullying strategies; and sexuality and sexual behaviour among young people
- Guidelines and training for staff working with disabled children aged 16 and over to ensure that decisions about disabled children who lack capacity will be governed by the Mental Health Capacity Act once they reach the age of 16.
- Use specialist service needs/multi-agency approach if as a college we feel additional, support resources and interventions are required.

²² <http://www.lcitylscb.org/information-for-practitioners/safeguarding-topics/neglect/>

APPENDIX 2 - PROCEDURE TO FOLLOW IN CASES OF POSSIBLE, ALLEGED OR SUSPECTED ABUSE, OR SERIOUS CAUSE FOR CONCERN ABOUT A CHILD: FOR ALL STAFF MEMBERS

Teachers are in a unique position to identify and help children who may be being abused. Although all colleges are required to have a named designated teacher with responsibility for co-ordinating child protection, this should not diminish the role all teachers have in protecting children. Child abuse usually comes to the attention of teachers in one of four ways:

- a direct allegation from the child being abused,
- a third party (e.g., friend, classmate) report,
- through the child's behaviour
- or through observation of an injury to the child.

When a child makes a disclosure, or when concerns are received from other sources, do not investigate, ask leading questions, examine children, or promise confidentiality. You may ask questions of a clarifying nature – such as 'who, what, where, when how?' or use the acronym TED – 'Tell me, 'Explain it to me', Describe it to me.'

Remember, the way in which you talk to the child may have an effect on any subsequent legal proceedings. You need to be open and non-judgemental. Children making disclosures should be reassured and, if possible, at this stage, should be informed what action will be taken next.

As soon as possible write a dated and timed note of what has been disclosed or noticed, said or done and report to the Designated Safeguarding Lead (DSL). It is important to act swiftly to avoid delays.

As a general guide, it is important to remember the following:

- **SECRETS** - A child's trust can place a heavy responsibility on teachers, particularly if they want the abuse to remain a secret. You should tell the child that if he or she is being hurt you will need to tell other people. The child may need to be reassured that you will only speak to those who need to know and that they will treat the matter confidentially.
- **LISTEN** - Listen carefully to the child. Take what he or she says seriously as it is rare for a child to make entirely false allegations.
- **REASSURE** - Reassure the child that he or she was right to tell and is not to blame for what happened, but do not promise confidentiality.
- **RECORD** - As soon as possible after talking with the child, make a written record of what was said at the time, when and where the conversation took place and who was present. This must be accurate and not interpretation or assumption. Note any colloquial/slang words used by students and any language/behaviour inappropriate for the child's age – do not convert them into proper terms. Remember this may be used in any subsequent legal proceedings so note down too, how the child was behaving and the way in which they told you what was happening. This may indicate how the child was feeling.

For injuries in specific areas, record the location accurately – DO NOT take photographs or examine the child yourself.

- **SUPPORT** - Get support for yourself. Listening to abused children can be very upsetting, and giving the child help may be difficult, if you are not given support yourself. Experience of working with children is not, in itself, preparation for the distress abuse can raise.
- **REMEMBER** - It takes courage and determination for a child to tell an adult that they are being, or have been, abused. When they do tell someone, it is usually a person who they feel they can trust and whom they feel is reliable. For reasons of confidentiality, only those people who need to know about the abuse should be told, and conversations about the child should always be held in private.

If the concern involves the conduct of a member of staff or volunteer, a visitor, a governor, a trainee or another young person or child, the DSL/Headteacher must be informed asap; if the concern is in reaction to your Headteacher, you must speak to your Governor. If you feel you cannot speak with your Governors, you must use the whistleblowing procedure and contact Duty & Advice/LADO for advice and support. (Appendix 7)

NB It is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

APPENDIX 3 - ALLEGATIONS ABOUT A MEMBER OF STAFF/VOLUNTEERS

Guidance on managing Allegations procedures for The City of Leicester College

As per KCSIE 2022, it is the responsibility of The City of Leicester College to ensure procedures are in place for dealing with concerns and/or allegations against those working in or on behalf of colleges and colleges in a paid or unpaid capacity, including, members of staff, supply teachers, volunteers and contractors. Our procedures are consistent with local safeguarding procedures and practice guidance and KCSIE 2022^[1].

1. Inappropriate behaviour by staff/volunteers could take the following forms:

- **Physical**
For example, the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or rough physical handling.
- **Emotional**
For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes that discriminate on the grounds of race, gender, disability or sexuality.
- **Sexual**
For example, sexualised behaviour towards students, sexual harassment, sexual assault and rape.
- **Neglect**
For example, failing to act to protect a child or children, failing to seek medical attention or failure to carry out an appropriate risk assessment.

KCSIE 2022^[2] states that LADO procedures are categorised in to 2 main areas:

1. Allegations that may meet the harms threshold
2. Allegation/concerns that do not meet the harms threshold – referred to as 'low level concerns'.

Section one: Allegations that may meet the harms threshold

- Behaved in a way that has harmed a child or may have harmed a child and/or
- Possibly committed a criminal offence against or related to a child and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Where there is a serious incident that may meet the harms threshold, the college will follow guidance and procedures as outlined in Keeping Children Safe in Education 2022 (Part 2 and Part 4).

Section Two: Concerns that do not meet the harms threshold (Low Level Concerns and/or staff conduct)

- Being overfriendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a 1-1 basis in a secluded area or behind a closed door; or
- Using inappropriate sexualised, intimidating, or offensive language

^[1] [Keeping children safe in education 2022 \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/101333/Keeping-children-safe-in-education-2022.pdf) - Part 4 Managing Allegations

^[2] [Keeping children safe in education 2022 \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/101333/Keeping-children-safe-in-education-2022.pdf) - Part 4 Managing Allegations

For further guidance regarding how The City of Leicester College manage allegations which do not meet the harms threshold will be considered under our Low-Level Concerns Policy (Annex 8) and/or Staff Code of Conduct (See Staff Handbook 2022/23)

If a staff member is unable to raise a concern about the inappropriate behaviour of another staff member, or any other safeguarding concern, all staff are aware of The City of Leicester College Whistleblowing Procedures (The City of Leicester Whistleblowing Policy – Appendix 7).

APPENDIX 4 - GUIDELINES FOR AVOIDING ALLEGATIONS OF ABUSE: FOR ALL STAFF MEMBERS

Whilst they may in common law be regarded as acting in loco parentis, teachers and carers in college should remember that they are not able to take the place of parents in providing physical comfort. This is not to say that all physical contact is inappropriate, rather that the professional context demands circumspection and a sense of fitness for purpose.

Teachers of very young children of nursery and Key stage 1 age will naturally need to engage in more physical contact than teachers of older children. Comforting a distressed child who may just have started college will not be an unusual occurrence. Similarly, in the special college setting, some children may tend towards demanding physical attention. In such circumstances, the contact by the adult will be for re-assurance and may involve physical closeness (e.g., holding the child's hand or placing hands on the child's shoulders). Hugging and kissing would be inappropriate for other than the parent, even though the child may want to initiate it.

Administration of medicines and first aid requires careful codes of conduct and procedures. These should be laid down by local authority or health authority or in individual college guidelines and followed meticulously. As a rule of thumb, teachers should not administer medicines. If the child had an adverse reaction to a medicine given by a teacher, the teacher could be held liable and charged with negligence.

Administration of first aid should be undertaken by a qualified first aider. Where none is available, the minimum steps should be taken to ensure the child's safety and the emergency services should be called.

Teachers may sometimes be called upon to intervene physically if a child or children are in danger of injuring themselves or others - as in a fight in the college yard. It is important that in such circumstances the minimum possible reasonable force is used. Where possible another colleague should be called upon to assist, both to minimise the risk of injury to the teacher intervening and to act as witness that reasonable force and no more was used. After such an event a clear record of what took place should be made, including where possible statements from witnesses. The Headteacher should be informed.

One-to-one situations with students need to be carefully and consciously managed. Some teaching, as with peripatetic music staff, may often suggest one-to-one organisation. Where students can be paired for such lessons, it is preferable. Where this is not possible and in other situations of individual interviews with students, it is advisable to use a room with a window where others can see in or to leave the door open. If confidentiality makes this difficult, then another member of staff should be informed that the interview is taking place.

If a child becomes distressed, support and re-assurance should be offered through calming words rather than through physical contact. Teachers should not become involved with children's personal problems beyond listening and being sensitive to them in order to refer the child to the most appropriate source of help or counselling.

APPENDIX 5 - INDICATORS OF VULNERABILITY TO RADICALISATION

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

2. Extremism is defined by the Government in the Prevent Strategy as:

Vocal or active opposition to fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

3. 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.

4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

5. 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. It is vital that college staff are able to recognise those vulnerabilities.

6. Indicators of vulnerability include:

- Identity Crisis – the student is distanced from their cultural / religious heritage and experiences discomfort about their place in society
- Personal Crisis – the student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging
- Personal Circumstances – migration; local community tensions; and events affecting the student’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet 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; and
- 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.

7. 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.

8. More critical risk factors could include:

- Being in contact with extremist recruiters

- Accessing violent extremist websites, especially those with a social networking element
- Possessing or accessing violent extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues; and
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and/or behaviour
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis

APPENDIX 6 – The City of Leicester College’s Guidance on child on child sexual violence and sexual harassment

****IMPORTANT NOTE:** as per KCSIE 2022, it is the sole responsibility for educational establishments to ensure that they have a ‘Guidance on child-on-child sexual violence and harassment’ for their establishment in place. The below information is taken directly from KCSIE 2022²³ and all education establishments are required to have guidance in place for such incidents. The information below information is a starting point to support college/colleges to write their own Child on Child Appendix for such incidents.**

KCSIE 2022 states that child on child sexual violence and sexual harassment forms part of the statutory guidance about how colleges and colleges should respond to all reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the college or college premises, and or online.

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can 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 face to face (both physically and verbally) and are never acceptable. The City of Leicester College takes such incidents seriously and have strict measures in place to address this kind of behaviour and our staff are advised to maintain an attitude of ‘it could happen here’.

Whilst our college strictly follows statutory guidance and information from the government **Sexual Violence and Sexual Harassment Between Children in Schools and Colleges**, the following measures are in place in order to support children and staff if such incidents are reported and received in our college/college.

Our staff are aware that we have a zero-tolerance approach towards harmful sexual behaviour. To develop and reinforce our culture of vigilance and safeguarding here at The City of Leicester College all staff attend annual Harmful Sexual Behaviour training and have access to a range of effective supporting resources to deepen their knowledge and understanding so as to ensure they are aware of the signs and signals to look out for. Through this knowledge staff are empowered to spot, support, report and record any harmful and/or problematic behaviours as they arise.

‘Time to act’ is as follows:

- Be aware and alert, especially in corridors and communal areas
- Intervene and report any concerns that you have
- Words have power, do not dismiss any sexualised language as “banter”, do not ignore it or be afraid to report it.
- Build positive and trusting relationships with our students
- Be open, honest and share opinions that make it clear that inappropriate sexualised behaviour and language are wrong and will not be tolerated
- Promote and educate students around healthy relationships and the associated characteristics and behaviours of these relationships

Definitions of Sexual Violence and Sexual Harassment (Taken from Keeping Children Safe in Education 2022)

Sexual Violence

It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it **can happen both inside and outside of**

²³ [Keeping children safe in education 2022 \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/101333/Keeping-children-safe-in-education-2022.pdf) - Part 5 Child on Child Abuse (Sexualised behaviour/Harassment)

school/college. When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003¹³⁴ as described below:

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. (NOTE - Schools and colleges should be aware that 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. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

What is consent? 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.¹³⁶

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape.

Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#)

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. Schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.

- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) provides detailed advice for schools and colleges.
 - sharing of unwanted explicit content
 - sexualised online bullying
 - unwanted sexual comments and messages, including, on social media
 - sexual exploitation; coercion and threats, and
 - coercing others into sharing images of themselves or performing acts they're not comfortable with online.

It is important that schools and colleges consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Harmful Sexual Behaviour

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. **HSB can occur online and/or face-to-face and can also occur simultaneously between the two.** HSB should be considered in a child protection context.

We have a zero-tolerance approach towards incidents of sexual violence and/or sexual harassment at The City of Leicester College. All incidences of child-on-child sexual violence or sexual harassment are managed in line with our school's Safeguarding Child Protection Policy.

We have an established and embedded network of support at the College delivered by our highly effective staff teams. When an incident of this nature is reported it will be triaged as appropriate and investigated by the relevant Safeguarding/Pastoral/Leadership Team member and appropriate action will be taken to support, safeguard, sanction and refer (as appropriate).

At The City of Leicester College our DSL, Senior Deputy DSLs AND Deputy DSLs are experienced to manage a child's disclosure of HSB and we use CPOMS to monitor and record any potential safeguarding incidents of this nature. All staff have access to CPOMS and have the relevant training and support to accurately record any concerns that they may have.

We will also ensure that young people are supported if they are the victim of child-on-child sexual violence or sexual harassment, this could be support from school staff or through signposting to external agencies.

We will endeavour to support the perpetrator of any such abuse to understand what has happened so that they can modify their behaviour and beliefs.

We will work with the parents/carers and external agencies of victims and perpetrators of child-on-child abuse to ensure holistic support for all parties.

Within The City of Leicester College, we have an internal support system where young people can be referred for bespoke pieces of work. This could be through 1:1 mentoring, identified workshops or small group work designed to support young people to explore a range of current and ongoing issues e.g., healthy relationships, self-esteem, mental health and wellbeing, self-harm etc.

All information related to any concerns of sexual violence or sexual harassment is logged on our CPOMS system this enables us to see any trends or ongoing concerns with specific students and allows us to identify any other concerns such as risky areas within the school or any emerging risks to children.

Risk assessments will be undertaken as an when deemed necessary and if necessary are discussed with the young person and where appropriate parents are engaged in this process.

Where applicable both victims and perpetrators will be supported through referrals to the most appropriate support available e.g., school counsellor, the school nurse or other external agency identified by The City of Leicester College. Where external agency referral/involvement required then a meeting for discussion with parents and young person will be held so everyone is aware of what is happening, and all information will be recorded onto CPOMS unless it is a confidential referral to Counselling then reference will be made to young person receiving internal support.



Whistleblowing Policy

Approved by:	Governing Body	Date: 12/09/2022
Last reviewed on:	Sept 2021	
Next review due by:	Sept 2023	
Chair of Governors:	J S Andrews	

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1. Policy Statement

- 1.1 Leicester City Council is committed to conducting its business with honesty and integrity and it expects all staff to maintain high standards of conduct. All organisations, however, face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.
- 1.2 The aims of this policy are:
 - a) To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected.
 - b) To provide staff with guidance as to how to raise those concerns.
 - c) To reassure staff that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.
- 1.3 This policy aims to explain what constitutes a whistleblowing complaint, how to raise one, how it will be dealt with and what protection is afforded to a legitimate whistleblower.

2. Scope

- 2.1 This policy applies to all individuals working at all levels of the organisation, including chief officers, officers, employees, consultants, trainees, part-time and fixed-term workers, casual and agency staff [and volunteers] (collectively referred to as **staff** in this policy).

3. What is Whistleblowing?

- 3.1 **Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

criminal activity; miscarriages

of justice; danger to health

and safety; damage to the

environment;

failure to comply with any legal obligation or regulatory requirements; bribery;

financial fraud or mismanagement;

negligence;

the deliberate concealment of any of the above matters

- 3.2 A **whistleblower** is a person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the council's activities (a **whistleblowing concern**) you should report it under this policy.

4. Whistleblowing is NOT

- 4.1 This policy should not be used for the following:

a) Raising concerns that relate to your own personal circumstances such as the way you have been treated at work. Such concerns should be raised in the first instance informally with your line manager who will attempt to resolve them for you. If no resolution is possible, the Grievance Procedure, (or other appropriate procedure such as the "Harassment and Discrimination procedure") should be used for this purpose.

b) Raising concerns of a serious nature which do not fall within the definitions set out at 3.1 above. The Grievance Procedure, or other procedure as appropriate, should be used for this purpose.

c) Raising concerns as a member of the public. The Corporate Complaints Procedure should be used for this purpose.

d) Raising concerns about Councillors. The Member Code of Conduct and Arrangements should be used for this purpose.

- 4.2 If you are uncertain whether something is within the scope of this policy, you should seek advice from Human Resources.

5. Raising a whistleblowing concern

- 5.1 We hope that in many cases you will be able to raise any concerns with your linemanager. You may tell them in person or put the matter in writing if you prefer.They may be able to agree a way of resolving your concern quickly andeffectively. Where you do not feel you can do this then you should raise your concern with a manager above the level of your immediate manager. In all casesthe manager will log the referral with the Monitoring Officer so that it can be recorded as a “whistleblowing complaint.”
- 5.2 Where the matter is more serious, or you feel that your line manager has not addressed your concern or you prefer not to raise it with them or their superior for any reason, you should raise your concern directly with the Monitoring Officer.Should the Monitoring Officer consider that your concern should not have been raised with them because (i) the allegation can be properly dealt with by another manager and/or (ii) your identity does not need protecting by the Monitoring Officer, they will discuss their view with you. Consequently, your referral may beredirected to your line manager or another appropriate manager. It is in any event in most cases likely that the Monitoring Officer in dealing with your concernwill liaise with your line manager regarding its progression. If you are in any doubt, you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details areat the end of this policy.

6. Confidentiality

- 6.1 It is hoped that staff will feel able to voice whistleblowing concerns openly underthis policy. If, however, you want to raise your concern confidentially, every effortwill be made to keep your identity confidential. In these circumstances and if it is necessary for anyone investigating or involved generally in your concern to know your identity, this will be discussed with you prior to your identity being disclosed.
- 6.2 Anonymous disclosures are not encouraged. Proper investigation may be more difficult or impossible if further information cannot be obtained from you. It is also more difficult to establish whether any allegations are credible and have been made in good faith. Whistleblowers who are concerned about possible reprisals if their identity is revealed should raise this at the time that they maketheir disclosure and appropriate measures can then be taken where appropriate.If you are in any doubt, you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

7. External Disclosures

- 7.1 The aim of this policy is to provide an internal mechanism for reporting,investigating, and remedying any wrongdoing in the workplace. In most cases youshould not find it necessary to alert anyone externally.
- 7.2 The law recognises that in some circumstances it may be appropriate for you toreport your

concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern externally. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

- 7.3 Whistleblowing concerns usually relate to the conduct of staff, but they may sometimes relate to the actions of a third party, such as a contractor. The law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. You are encouraged, however, to report such concerns internally in line with the procedure outlined above.

8. Investigation and Outcome

- 8.1 Once you have raised a concern, an initial assessment will be undertaken to determine what, if any, steps should be taken. As part of this process, whether your concern falls within the scope of this policy will be considered. You will be informed of the outcome of the assessment. You may be required to attend meetings in order to provide further information.
- 8.2 Following the initial assessment an investigation may be undertaken. It may be appropriate for a line manager or some other Council officer to undertake the investigation. Questions of potential conflict of interest will be considered in determining the appropriateness or otherwise of any particular officer carrying out an investigation. Where a potential or actual conflict of interests exists for a particular officer they should not carry out the investigation. In exceptional circumstances or where specific expertise is required, an external investigator may be appointed.
- 8.3 It may be appropriate to instigate a further procedure following the conclusion of any investigation, such as the disciplinary procedure. Any such action falls outside the scope of this policy.
- 8.4 Whilst in most circumstances you will be kept informed of the progress of any investigation and its likely timescale, the need for confidentiality may prevent the provision of information to you including specific details of the investigation or any disciplinary action taken as a result. The investigator will decide what details, if any, should be provided to you regarding the investigation itself and its outcome. You should, however, treat any information about the investigation provided to you as confidential.
- 8.5 If it is concluded that a whistleblower has made false allegations maliciously, in bad faith (i.e. not merely mistakenly) or with a view to personal gain, the disciplinary procedure will be followed in respect of that complaint.

9. Protection and Support for Whistleblowers

- 9.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. The Council aims to encourage openness and will support staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 9.2 Staff must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have

suffered any such treatment, you should inform your line manager or HR immediately who will assess what steps, if any, should be taken. If for any reason you do not believe it is appropriate to raise this with your line manager you should inform the next line of management. Where matters have been disclosed in confidence and anonymously, then you can speak with the Monitoring Officer. If the matter is not resolved to your satisfaction you may raise this using the Grievance Procedure.

- 9.3 Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

10. Responsibility for the success of this policy

- 10.1 The Monitoring Officer has overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 10.2 The Monitoring Officer has day-to-day operational responsibility for this policy and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.
- 10.3 The Monitoring Officer should review this policy from a legal and operational perspective at least once a year. Trade Unions will be consulted before any changes are implemented.



Low-Level Concerns Policy

2022-23

Safeguarding is defined as protecting children from maltreatment, preventing impairment of physical and mental health and/or development, ensuring that children grow up in the provision of safe and effective care and taking action to enable all children to have the best life chances.

Approved by:	Governing Body	Date: 01/09/2022
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Last reviewed on:	
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Next review due by:	Sept 2023
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Chair of Governors:	
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Statement of intent

The City of Leicester College understands the importance of acknowledging, recording and reporting **all** safeguarding concerns, regardless of their perceived severity. We understand that, while a concern may be low-level, that concern can escalate over time to become much more serious.

Our school prides itself on creating a safe environment for pupils, and our staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding pupils. The school has clear professional boundaries which all staff are made aware of and will adhere to. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to our pupils and other children.

It may be possible that a member of staff acts in a way that does not cause risk to children but is however inappropriate. A member of staff who has a concern about another member of staff should inform the Headteacher about their concern using a Low-Level Record of Concern Form. If the Headteacher cannot be contacted, the Chair of Governors should be contacted instead

1. Legal Framework

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

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- DfE (2023) 'Keeping children safe in education 2023'
- DfE (2018) 'Working Together to Safeguard Children'

The following is taken from Keeping Children Safe in Education September 2023

423. As part of their whole school or college approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

424. Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- encourage an open and transparent culture
- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse, and
- ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

This policy operates in conjunction with the following school policies:

- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Online Safety and Acceptable Use Policy
- Data Protection Policy
- Disciplinary Policy and Procedure

2. Definitions

For the purposes of this policy, a **low-level concern** is defined as any concern had about an adult's behaviour towards, or concerning, a child that does not meet the harms threshold (see below), or is otherwise not serious enough to consider a referral at the time of its reporting. Low-level concerns refer to behaviour on the part of a staff member towards pupils that is considered inappropriate in line with statutory safeguarding advice, the Staff Code of Conduct, and the Appropriate and inappropriate behaviour subsection of this policy.

Low-level concerns are differentiated from concerns that can cause **harm**. The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child. This threshold is defined as accusations that an adult 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.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of school.

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, the school understands that many serious safeguarding concerns, e.g. child sexual abuse, often begin with low-level concerns, e.g. being overly friendly with children. The school will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

3. Roles and Responsibilities

The Governing Board is responsible for:

- Ensuring that the school complies with its duties under child protection and safeguarding legislation.
- Ensuring that policies, procedures and training opportunities with regard to reporting safeguarding concerns are compliant and effective.
- Guaranteeing that there is an effective Staff Code of Conduct that outlines behavioural expectations.
- Ensuring that a suitably trained DSL has been appointed, alongside deputy DSLs where appropriate.
- Ensuring that there are robust reporting arrangements, including inter-agency collaboration.
- Ensuring that there are appropriate procedures in place to handle allegations and low-level concerns reported against members of staff.

The Headteacher, Ken Vernon, is responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- Assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns.
- Implementing this policy, and all related policies, throughout the school, and ensuring that staff adhere to it at all times.
- Safeguarding pupils' wellbeing and maintaining public trust in the teaching profession.
- Ensuring that all staff have undertaken safeguarding training.
- Ensuring that all staff have an ongoing awareness of low-level concerns and reporting procedures.

The DSL, Jill Walton, is responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- Assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns.
- Following all procedures outlined in this policy for acting upon low-level concerns.
- Liaising with the Headteacher, staff members, the governing body and all relevant agencies to act upon concerns, where necessary.
- Keeping detailed, accurate and secure records of all low-level concerns and any actions taken.

Staff are responsible for:

- Adhering to all the relevant policies and procedures, including acting within the Staff Code of Conduct at all times.
- Interacting with pupils in a way that is respectful and appropriate for their level of authority and has due regard to the power imbalance between pupils and staff members.
- Understanding the importance of reporting low-level safeguarding concerns.
- Reporting any and all safeguarding concerns they may have about pupils immediately.
- Reporting any and all safeguarding concerns they may have about the behaviour of a member of staff immediately.

4. Prevention Amongst Staff

Appropriate and inappropriate behaviour

The school will ensure that all staff members are aware of the standards of appropriate behaviour expected towards pupils.

Staff will ensure that they pay due regard to the fact that:

- They are in a unique position of trust, care, responsibility, authority and influence in relation to pupils.
- There is a significant power imbalance in the pupil-staff dynamic.
- There are more stringent expectations on their behaviour with regard to pupils due to their position as a public professional.

Staff will remain aware of the fact that all pupils under the age of 18, regardless of the phase and year group they are at within the school, are children by law – resultantly, staff will ensure that they do not assume maturity on behalf of a pupil and do not engage with pupils as they would with their own peers. Staff will be aware that where there is any doubt regarding whether the behaviour of another adult is appropriate, this should be reported to the Headteacher immediately.

Inappropriate behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour to behaviour which is ultimately intended to enable abuse. Examples of inappropriate behaviour that would constitute a low-level concern that should be reported to the Headteacher include:

- **Being overly friendly with children** – this could include, but is not limited to, communicating with a child through personal social media or allowing inappropriate conversations or enquiries to occur with pupils, e.g. conversations that are about a staff member's personal life or are of a sexual nature.
- **Having favourites** – this could include, but is not limited to, calling pupils by pet names or terms of endearment or buying pupils gifts.

- **Taking photographs of children on their personal mobile phones or devices.**
- **Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.**
- **Using inappropriate, sexualised, intimidating or offensive language.**

Staff will be aware that some of the above low-level concerns may meet the harms threshold depending on certain factors, e.g. the age or needs of the child or the content of exchanged messages, and that some of the above incidents may not be concerns in context, e.g. a pre-approved, one-to-one meeting with a child behind a closed door between the child and a school counsellor who has received all appropriate safety checks.

Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that this does not negate the need to report the behaviour. Staff members who engage in low-level inappropriate behaviour in relation to pupils inadvertently will be made aware and supported to correct this behaviour in line with the Staff Code of Conduct. The Headteacher will also evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour, or the staff cohort as a whole where low-level concerning behaviour is seen more widely.

School culture

The school understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc.

The school will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members. All staff will read, understand and adhere to the Appropriate and inappropriate behaviour subsection of this policy, as well as the Staff Code of Conduct.

Staff will address any questions they have regarding safeguarding to the DSL or Senior Deputy DSL. The school will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the school community, e.g. pupils are not treated as friends and an appropriate professional distance is maintained by staff.

The school will ensure that all staff are sufficiently trained surrounding the reporting of safeguarding concerns as part of their induction, and that refresher training is conducted as necessary. The school will ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify concerning or problematic behaviour towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils.

Evaluating school culture following concerns

The school will ensure that appropriate consideration is given to the school's culture and whether or not it has enabled the inappropriate behaviour to occur. The Headteacher will review whether any changes need to be made to relevant policies or training programmes in light of any evaluations of the school's culture, in order to achieve an open and transparent culture that deals with all concerns promptly and appropriately.

5. Reporting Concerns

The school will promote a culture in which safeguarding pupils is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns, regardless of their relationship with the staff member.

Staff will report all safeguarding concerns they have to the Headteacher immediately in line with the procedures laid out in the Safeguarding and Child Protection Policy. Staff members will report concerns without undue delay. Staff members will be aware that concerns are still worth reporting even if they do not seem serious.

Staff members will report their concerns to the Headteacher and Senior Deputy Headteacher verbally, or by submitting a Low-level Concern Reporting Form. When submitting concerns, staff will take care to ensure that they observe the Confidentiality Policy and the Allegations of Abuse Against Staff Policy, and protect the identity of all individuals to which the concern pertains as far as possible.

Staff members may request anonymity when reporting a concern, and the school will endeavour to respect this as far as possible. The school will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g. where it is necessary for a fair disciplinary hearing. In line with the Whistleblowing Policy, staff will be protected from potential repercussions caused by reporting a genuine concern.

Where a low-level concern relates to the Headteacher, it should be reported to the Chair of Governors.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, staff will also be required to report this to the Headteacher, who will, in turn, inform the employer of the subject of the concern.

All concerns reported to the Headteacher will be documented in line with Keeping Children Safe in Education

6. Self-Reporting

On occasion, a member of staff may feel as though they have acted in a way that:

- Could be misinterpreted.
- Could appear compromising to others.
- They realise, upon reflection, falls below the standards set out in the Staff Code of Conduct or violates the Inappropriate Relationships with Pupils Policy.

The school will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have acted inappropriately or in a way that could be construed as inappropriate upon reflection. The Headteacher and DSL will, to the best of their abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report.

Staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

7. Evaluating Concerns

Where the Headteacher is notified of a safeguarding concern, they will use their professional judgement to determine if the concern is low-level or if it must be immediately escalated, e.g. where a child is at immediate risk of harm. When deciding if a concern is low-level, the Headteacher will discuss the concern with the DSL and the deputy Headteacher and will seek advice from the Local Area Designated Officer (LADO) where there is any doubt about how seriously to take the concern. When seeking external advice, the Headteacher will ensure they adhere to the Data Protection Policy, and the information sharing principles outlined in the Child Protection and Safeguarding Policy, at all times.

To evaluate a concern, the Headteacher and DSL will:

- Speak to the individual who raised the concern to determine the facts and obtain any relevant additional information.
- Review the information and determine whether the behaviour displayed by the individual about whom the concern was reported is consistent with the Staff Code of Conduct and the law.
- Determine whether the concern, when considered alongside any other low-level concerns previously made about the same individual, should be reclassified as an allegation and dealt with alongside the Allegations of Abuse Against Staff Policy.
- Consult with, and seek advice from the LADO
- Speak to the individual about whom the concern has been raised to inform them of the concern and to give them an opportunity to respond to it.
- Ensure that accurate and detailed records are kept of all internal and external conversations regarding evaluating the concern, and any actions or decisions taken.

8. Acting on Concerns

Where the concern is unfounded

If it is discovered upon evaluation that the low-level concern refers to behaviour that was not considered to be in breach of the Staff Code of Conduct, the Headteacher will speak to the individual about whom the concern was made to discuss their behaviour, why and how the behaviour may have been misconstrued, and what they can do to avoid such misunderstandings in the future. The Headteacher will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with school standards and the law. The Headteacher will take care to ensure that conversations with individuals who reported concerns that transpired to be unfounded do not deter that individual from reporting concerns in the future.

The Headteacher will discuss the concern with the DSL to discern whether the behaviour, and the reporting of this behaviour, is indicative of ambiguity in the school's policies or procedures, or the training it offers to staff. Where such ambiguity is found, the DSL and Headteacher will work together to resolve this with input from other staff members, as necessary.

Where the concern is low-level

Where the Headteacher determines that a concern is low-level, the school will respond to this in a sensitive and proportionate manner. The following procedure will be followed:

- The Headteacher holds a meeting with the individual about whom the concern was reported, during which they will:
 - Talk to the individual in a non-accusatory and sympathetic manner.
 - Inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible).
 - Clearly state what about their behaviour was inappropriate and problematic.
 - Discuss the reasons for the behaviour with the individual.
 - Inform the individual clearly what about their behaviour needs to change.
 - Discuss any support that the individual may require in order to achieve the proper standards of behaviour.
 - Allow the individual the opportunity to respond to the concern in their own words.
- The Headteacher will ask the individual to re-read the Staff Code of Conduct.
- The DSL and the Headteacher will consider whether the individual should receive guidance, supervision or any further training.

- Where considered appropriate in the circumstances, the Headteacher will develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves.
- Where it is necessary to undergo an investigation into the behaviour, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis.
- Where any pupil or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support, where appropriate.

The Headteacher will ensure that all details of the low-level concern, including any resultant actions taken, are recorded, and securely stored in line with the Data Protection Policy. The Headteacher will ensure that these records are kept organised and up-to-date, and that it is easy to refer to them if any other concerns are reported about the same individual.

The specific approach to handling low-level concerns will be adapted on a case-by-case basis. It is unlikely that a low-level concern will result in disciplinary procedures; however, individuals may be given warnings in line with the Disciplinary Policy and Procedure where behaviour does not improve once it is brought to their attention. Where behaviour does not improve over a longer period, the concerns will be escalated and dealt with in line with The City of Leicester College's Guidance on Managing Allegations (Appendix 3) and the guidance and procedures as outlined in Keeping Children Safe in Education 2022 (Part 2 and Part 4).

Where the concern is serious

The Headteacher may decide upon evaluation that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about the same individual. Where this decision is made, the concern will be escalated, and dealt with as an allegation. The Headteacher will then follow the procedures laid out in The City of Leicester College's Guidance on Managing Allegations (Appendix 3) and the guidance and procedures as outlined in Keeping Children Safe in Education 2022 (Part 2 and Part 4).

9. Record keeping

The school will retain all records of low-level concerns, including those that were found to be unfounded. The Headteacher will ensure that all records include the most accurate and up-to-date information and will store them securely in a locked cabinet, in a locked office; there will also be a digital copy retained that will be password protected; all files will only be accessible for the Headteacher and DSL. The Headteacher will ensure that all low-level concerns are stored together, in an organised and consistent manner, to ensure they can be easily reviewed and analysed where necessary.

Records will include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached, and the outcome.
- The name of the individual sharing concerns – if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.

The Headteacher will periodically review the recent low-level concerns made to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort as a whole. The Headteacher will keep records of these reviews.

Where any concerning patterns of behaviour have been identified with regard to a member of staff, the Headteacher to decide on a course of action. Where a pattern of behaviour has become so concerning that it meets the harms threshold, this will be referred to the LADO as soon as practicable.

Records of low-level concerns will not be kept in the personnel file of the individuals to whom the concerns pertain, unless there have been multiple low-level concerns made about the same individual. Where a concern is thought to be serious and is processed as an allegation, records of this will be kept in staff personnel files. Where multiple low-level concerns have been made about the same individual, these will be kept together, and in chronological order.

Where an allegation is made about an individual who has previously been subject to such allegations, or where a low-level concern is reclassified as a serious concern after meeting the harms threshold, all records of low-level concerns about that individual will be moved to the staff personnel file and kept alongside records of the allegation.

The Headteacher will ensure that all records are kept in a manner that is consistent with the Data Protection Policy. Records will be kept confidential and securely destroyed **after the staff member to whom the concerns pertain has left the school.**

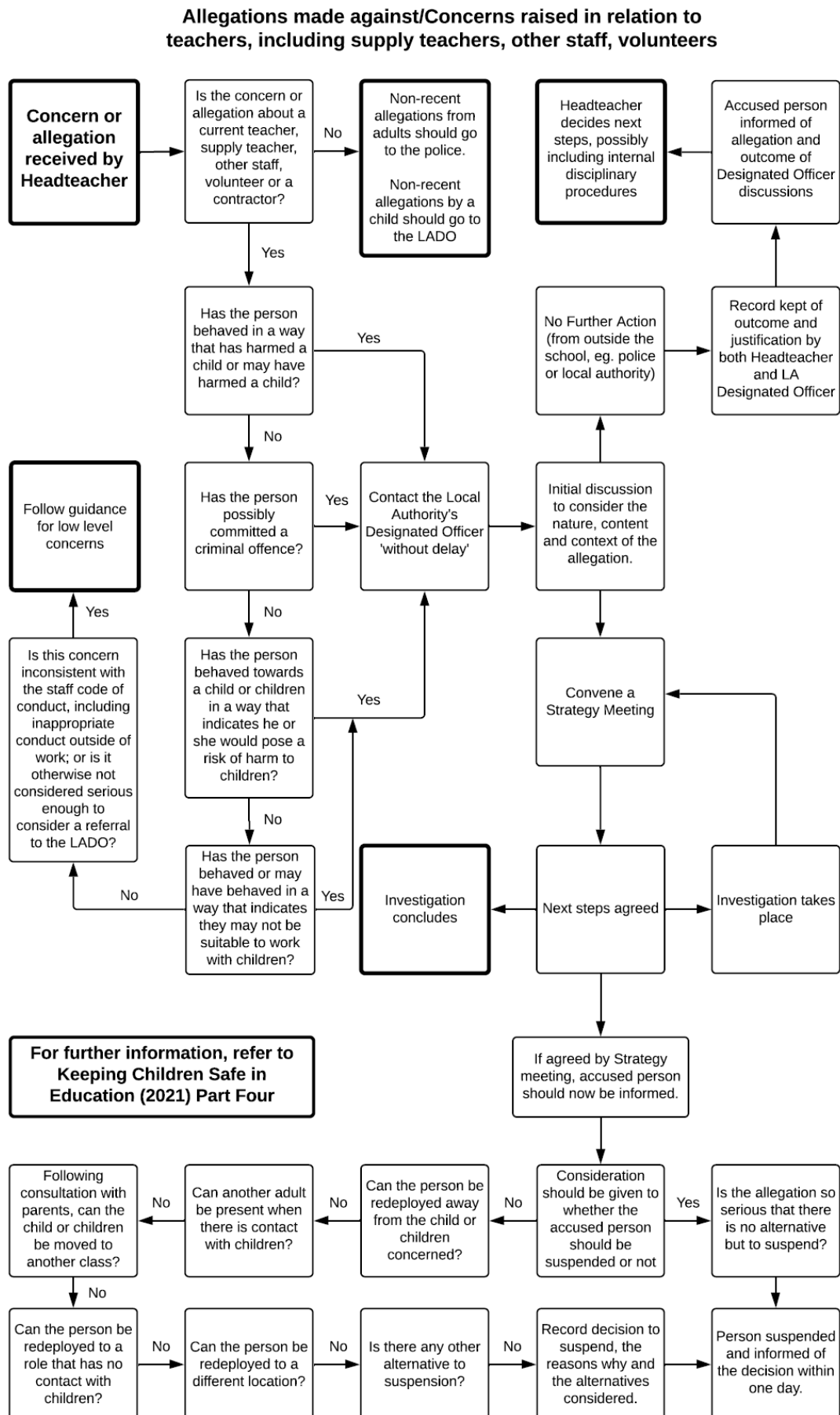
The school will only refer to concerns about a staff member in employment references where they have amounted to a substantiated safeguarding allegation, i.e. it has met the harms threshold and has been found to have basis through investigation, or where it is not exclusively a safeguarding issue and forms part of an issue that would normally be included in a reference, e.g. misconduct or poor performance. Low-level safeguarding concerns will not be included in a reference, unless they have comprised a pattern of behaviour that has met the harms threshold.

10. Monitoring and Review

This policy will be reviewed annually by the Headteacher and DSL, and in response to any new safeguarding requirements or concerns surrounding the wider cultural issues in the school. the next scheduled review date for this policy is **September 30th 2023**

Appendices

Process to follow when reporting a Low-Level Concern



Low-level Concern Reporting Form

Please use this form to share any concern – no matter how small, and even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with The City of Leicester College’s Code of Conduct, and/or;
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

Where possible please speak with the Head Teacher, Ken Vernon, or DSL, Jill Walton, as soon as possible. It is also helpful to document your concerns, which can be done using this form and then passed to the Head Teacher or DSL. When completed, please pass this form to the Head Teacher or DSL. If the concern is about the Head Teacher, please pass it onto the Chair of Governors, John Andrews, or email them: jandrews@tcolc.aspirelp.uk

Remember, a low-level concern is different to an allegation See the table below for a definition:

Allegation

Behaviour which indicates that an adult who works with children 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.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of school.

Low-Level Concern

Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

Is not consistent with the school’s Code of Conduct

Appropriate Conduct

Behaviour which is entirely consistent with the organisation’s Code of Conduct, and the law

The City of Leicester College

Low-Level Concern Reporting Form



What is a Low-Level Concern?

Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- Is not consistent with the school’s Code of Conduct
- Relates to their conduct outside of work which, even if not linked to a particular act or omission
- has caused sense of unease about the adult’s suitability to work with children

Once completed this form will need to be passed directly to either the Headteacher, Ken Vernon, or the Lead DSL, Jill Walton

Your name (optional)	
Role (optional)	
Relationship to the individual reporting the concern, e.g., manager, colleague	

Details of the concern.

Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?

Details of any children or young people involved	Name(s) and Year group
Please state any other information that you believe is relevant to the processing of this concern.	
Signature	
Date	
Time	

For use by safeguarding team upon receipt of concern

Date and time concern received	
Signature of Headteacher and/or DSL	
Actions to be taken, e.g., no action, investigation, reclassification as allegation meeting the harms threshold	

