Safeguarding Policy

Reviewed: July 2019

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Next Review: 31st August 2020

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<tr>
<td>Synopsis:</td>
<td>This policy and its associated procedures describe Bellerbys College student safeguarding and welfare principles and approach. It includes safeguarding roles and responsibilities of College staff and their requirement to identify safeguarding concerns, mitigate safeguarding risks and raise concerns appropriately.</td>
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| Related Study Group Documents: | Behaviour Policy  
Attendance Policy  
Residential Handbook  
Homestay Guidelines  
Care of Students with Health Conditions  
Study Group Equality and Diversity Policy  
Student Code of Conduct  
Study Group Staff Disciplinary Policy  
Study Group Whistleblowing Policy  
Study Group Safer Recruitment Policy  
Study Group H&S Policy and associated SOP’s  
Study Group Data Protection Policy  
Study Group Use of Technology Policy |
| Date(s) modified/reviewed: | June 2018 (Sandy Connors) Overarching Safeguarding Policy replaces all other welfare Policies including the Child Protection Policy.  
30 August 2018: Principals’ Review  
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| Publication       | This policy is available to staff via our website [www.bellerbys.com](http://www.bellerbys.com)  
This policy is available to students, parents and external parties via our website, [www.bellerbys.com](http://www.bellerbys.com) |
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Chair, Bellerbys Educational Services Limited

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This policy should be read in conjunction with local procedures
1. Introduction

Bellerbys College aims to be a community where young people are protected from harm and have the right to access their education in a safe and secure environment. This policy and its associated procedures describe Bellerbys College student safeguarding and welfare principles and approach. It includes safeguarding roles and responsibilities of College staff and their requirement to identify safeguarding concerns, mitigate safeguarding risks and raise concerns appropriately.

1.1. Multi-Agency Contacts - Children

Bellerbys London falls under London Borough of Greenwich Local Authority and acts in accordance with locally agreed inter-agency procedures. The former Local Safeguarding Children Board is now the Greenwich Safeguarding Children .Partnership

The Local Authority Designated Officer (LADO) for Greenwich (Education) is Catrin Gruffydd Jones.

Catrin can be contacted via telephone on 020 8921 2351 for concerns about staff working with children

Concerns about the welfare of a child can be passed to the appropriate local agency by contacting Multi Agency Safeguarding Hub (MASH) on the following numbers:

MASH Team 020 921 3172 or after hours on 020 8854 8888
Consultation Line 0208 921 2267
The address is: The Woolwich Centre, 35 Wellington Street, London, SE18 6HQ
www.royalgreenwich.gov.uk

In an emergency dial 999 and ask for the Police.

1.2. Local Agency Contacts – Adults

Concerns about adults at risk should be passed to the Contact Assessment Team, (CAT) on 0208 921 2304 or after hours on 020 8854 8888

1.3. College Contacts

The Designated Safeguarding Lead is Yvonne Silk Jones, Director of Student Services, on ysjones@studygroup.com or 0208 694 7016
The Deputy Designated Safeguarding Lead is Fay McCormick, Welfare Manager. fmccormick@studygroup.com or 0208 694 7009

The nominated person for safeguarding governance (the “Nominated Safeguarding Governor”) is Durell Barnes on dbarnes@studygroup.com.

1.4. Independent Listener

The Independent Listener for Bellerbys College London is Paulette Hooper on 07891 88 88 51
2. Purpose

This policy supports Bellerbys College statutory duty to safeguard and promote the welfare of both children and adults. It gives due regard to the *Keeping Children Safe in Education, September 2019* and *Working Together to Safeguard Children, July 2018*; and is pursuant to *The Education (Independent School Standards) (England) Regulations 2014* and Department for Education *Boarding Schools National Minimum Standards, March 2015*.

The Senior Management team ensures that the College complies with its duties under the legislation below:

- Children Act 1989
- Children Act 2004
- Education Act 2002
- Education Act 2011
- Safeguarding Vulnerable Groups Act 2006
- Education and Inspections Act 2006
- Children and Young Persons Act 2008
- School Staffing (England) Regulations 2009
- Equality Act 2010
- Protection of Freedoms Act 2012
- Police Act 1997 (Criminal Records) Regulations 2002
- Police Act 1997 (Criminal Records) (No. 2) Regulations 2009.
- Prevent Strategy HM Government
- Counter Terrorism and Security Act 2015 (Prevent Duty)
- General Data Protection Regulation 2016/679

All College staff are required to read Part 1 and Annex A of *Keeping Children Safe in Education, September 2019*

3. Scope

The policy applies to all College and Study Group staff, as well as host families and all visitors to College premises, students, and (where applicable) their parents and/or guardians.

4. Policy Aims

The aim of the Safeguarding policy is to ensure:

- That all students are safe;
- That all staff and students can recognise welfare issues and the signs of abuse;
- That all staff act according to the best interests of students;
- That all welfare concerns are swiftly and efficiently identified and escalated to the appropriate member of staff (or where appropriately to an external agency);
- That all Child Protection concerns are appropriately addressed as per current legislation;
- That all safeguarding is integrated into the leadership and management of the College.
5. **Bellerbys College Safeguarding Principles**

Bellerbys College recognises that any student regardless of age could be potentially vulnerable. These vulnerabilities could be linked to illness, SEN or disability, mental or emotional distress or pre-existing abuse. It should also be noted that student vulnerabilities within an international college setting could be linked to using English as a second language or may be heightened by cultural differences.

As such, Bellerbys College is committed to safeguarding all students and this is underpinned by the following:

- Safeguarding is everyone’s responsibility;
- All staff understand that abuse in any form can happen within the College;
- All students feel safe and secure and protected from harm;
- All staff and students are vigilant of possible safeguarding issues and risks of harm;
- All staff and students have effective and various means to raise concerns;
- All staff and students are aware of how to access help, advice and support;
- All staff are aware of the importance of early help and how to access it;
- All College buildings are safe places for students to learn and live;
- Staff are aware of and actively use the Safeguarding Policy and adhere to safeguarding procedures;
- All reasonable steps are taken to know or find the whereabouts of students who are aged under 18 or are considered vulnerable adults;
- Where appropriate, staff are made aware of those students who are vulnerable and/or have special needs;
- Staff have at least one reliable means to contact students quickly and directly;
- Where reasonably practicable, there are at least two emergency contact numbers for each student;
- The Principal has overall accountability for the safeguarding of students;
- The Designated Safeguarding Lead has overall responsibility for safeguarding;
- The Designated Safeguarding Lead acts on all safeguarding or Child Protection concerns as per current legislation.

6. **Child Protection**

Bellerbys London falls under London Borough of Greenwich Local Authority and acts in accordance with locally agreed inter-agency procedures. The former Local Safeguarding Children Board is now the Greenwich Safeguarding Partnership.

The Local Authority Designated Officer (LADO) for Greenwich (Education) is **Catrin Gruffydd Jones**. Catrin can be contacted via telephone on 020 8921 2351 for concerns about staff working with children.

Concerns about the welfare of a child can be passed to the appropriate local agency by contacting Multi Agency Safeguarding Hub (MASH) on the following numbers:

MASH Team 020 921 3172 or after hours on 020 8854 8888
Consultation Line 0208 921 2267
The address is: The Woolwich Centre, 35 Wellington Street, London, SE18 6HQ
www.royalgreenwich.gov.uk

In an emergency dial 999 and ask for the Police.

All staff must read both Part 1 and Annex A of the Keeping Children Safe in Education, September 2019.

Please refer to Appendix 2: Definitions of abuse and Appendix 3: Indicators of Abuse and Neglect

7. Safeguarding adults who are vulnerable

It is recognised that an adult student could be vulnerable on arrival or become vulnerable whilst at the College and as such all elements of this Safeguarding Policy apply.

In the event that a significant concern is raised regarding an adult student, the Designated Safeguarding Lead will ensure that appropriate action and support are provided including referrals to appropriate agencies i.e. Police, NHS or local Adult services.

Concerns about adults at risk should be passed to the Contact Assessment Team, (CAT) on 0208 921 2304 or after hours on 020 8854 8888

8. Roles and responsibilities

8.1. Governing Body

The Proprietor of Bellerbys College is Bellerbys Educational Services Ltd.

The Proprietor will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part 1 of the Keeping Children Safe in Education, September 2019 guidance.

The Proprietor undertakes an annual review of safeguarding arrangements across all Bellerbys Colleges. This is signed off by Mike Everett, Chair of Bellerbys Educational Services Limited. Please refer to the College Self Evaluation and Monitoring Section of this Policy for further information.

The Bellerbys College Advisory Board (the Advisory Board) has been established by Bellerbys Educational Services Limited (the Proprietor) to assist in the effective oversight and holding to account of the three Bellerbys Colleges, located in Brighton, Cambridge and London (the Colleges).

The Proprietor and Advisory Board Members undertake suitable safeguarding training to ensure they are equipped with the knowledge to fulfil their functions.

The existence of the Advisory Board forms part of the Proprietor’s acceptance of and response to its legal responsibilities, not a delegation or abrogation of them.

The nominated person for safeguarding governance (the “Nominated Safeguarding Governor”) is Durell Barnes on dbarnes@studygroup.com.
8.2. Designated Safeguarding Lead

Bellerbys College has appointed a Designated Safeguarding Lead (DSL) from the Senior Management Team. In normal circumstances this is the Director of Student Services and the function of Designated Safeguarding Lead is included in their Job Description.

In the event the Designated Safeguarding Lead is unavailable, then the Deputy Designated Safeguarding Lead (DDSL) assumes their duties and responsibilities. In the event that both the DSL and the DDSL are absent from College at the same time, staff should consider speaking to a member of the wider Safeguarding Team, the Senior Leadership Team, or take advice from local Childrens’ Social Care or the Adult Assessment Team in Greenwich. In these circumstances, any action taken should be shared with the DSL or DDSL as soon as is practically possible.

Both the Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead are trained in higher level Safeguarding training which is aligned to the local Safeguarding Partnership and is updated every two years. Both the Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead undertake additional training as required and attend briefings throughout the year to ensure that their knowledge and practice are up to date, including awareness of any specific requirements set by the relevant local Safeguarding Partnership, including their approach to Prevent duties.

The Designated Safeguarding Lead has overall responsibility for the safeguarding and welfare of students, supported by other members of College staff, and is the College representative for any child protection, vulnerable adult or significant safeguarding issues requiring inter-agency working. This includes escalating referrals where concerns are still to be addressed.

The Designated Safeguarding Lead is also the Prevent Lead for the College

The Designated Safeguarding Lead is responsible for taking action on Online Safety (Smoothwall incidents) and undertakes training in online safety.

The Proprietor ensures that the Designated Safeguarding Lead is a member of the College Senior Management Team and has appropriate status and authority to carry out the duties of the post. The lead responsibility for child protection remains with the DSL and cannot be delegated.

The Designated Safeguarding Lead is Yvonne Silk Jones, Director of Student Services, on ysjones@studygroup.com or 0208 694 7016

The Designated Safeguarding Lead will ensure that:

- All staff members are aware that safeguarding is the responsibility of everyone;
- All staff members receive those parts of the induction that include the Safeguarding Policy, the Staff Code of Conduct, and the identity of the Designated Safeguarding Lead;
- All staff members read and understand their responsibilities under Part 1 and Annex A of Keeping Children Safe in Education, Sept 2019
- All staff members are aware of the identity of and understand the role of the Designated Safeguarding Lead and their deputies;
- All staff members are aware of and understand the procedures that support the Safeguarding Policy;
- All staff members are aware of the necessity of seeking early help;
• All staff members are aware of how to respond to and report concerns about children in line with *Working Together to Safeguarding Children, July 2018*;
• All staff members are aware of how to respond to and raise concerns about adult students in line with College policy;
• All staff members have access to advice and support on issues relating to child protection and adult vulnerability;
• All staff members, including the Principal, complete safeguarding awareness training which is updated every three years;
• All staff members have completed Prevent training, either face to face or on-line;
• All staff receive training in online safety, by completing the comprehensive NOS Online Safety training in the online package within the first six weeks of starting;
• All staff receive regular (at least annually) safeguarding and child protection updates.
• All safeguarding training (including annual safeguarding and child protection updates) is recorded within a central training log(s);
• All students receive a full induction and timely updates on matters relating to safeguarding and welfare;
• All students receive age appropriate welfare based information and guidance via the PSHE programme;
• All students have sufficient and appropriate means to report concerns, issues and incidents;
• All safeguarding related concerns, issues, incidents, reports, referrals and complaints are recorded and kept securely;
• Any child or vulnerable adult in need is getting appropriate individual support, advice and access to services;
• All boarding students under the age of 18 and staff are aware of who the Independent Listener is and how they can be contacted;
• They are working holistically and in partnership with other agencies that can provide welfare and safeguarding support and information to students;
• The Safeguarding policy is made available to students and to their parents/guardians;
• With the Principal and the Director of Safeguarding UK &EU, that the Safeguarding policy is reviewed, evaluated and revised, as needed, annually.

8.3. The Deputy Designated Safeguarding Lead
The Deputy Designated Safeguarding Lead is responsible for supporting the Designated Safeguarding Lead in their duties and responsibilities day-to-day, and for assuming these duties and responsibilities in their absence.

The Deputy Designated Safeguarding Lead is Fay McCormick, Welfare Manager. fmccormick@studycloud.com or 0208 694 7009

8.4. Wider Safeguarding Team
The Safeguarding Team consists of the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead and five other designated Safeguarding Team Members. All team members have the DSL level training in Safeguarding. Activities may be delegated to these officers by the Designated Safeguarding Lead. The Welfare Manager is responsible for administrating the Child Protection Online Monitoring system (CPOMS).
The Safeguarding Team operates on a rota 24 hours per day to offer support to staff working outside office hours in the residencies and boarding houses, Reception and weekend staff. Security also work 24 hours per day.

Safeguarding activities may be delegated to the Deputy Designated Safeguarding Lead or Safeguarding Team by the Designated Safeguarding Lead. The Safeguarding Team will assist with developing staff understanding of the local safeguarding procedures, as well as act as a resource for staff should concerns arise. In addition to the weekly multi-disciplinary team meeting (MDT meeting), the DSL and Deputy DSLs meet regularly to discuss safeguarding issues.

8.5. Independent Listener
The College has an Independent Listener, external to the staff, who is available for boarding students under the age of 18 to call if they have welfare or safeguarding needs or concerns or just wish to talk to someone about their experiences away from home. This is in line with the expectations of the National Minimum Standards for Boarding Schools, March 2015 (NMS 2.3).

The Independent Listener for Bellerbys College London is Paulette Hooper on 07891 88 88 51
The Independent Listener is classified as a volunteer and as such, is subject to all safer recruitment checks as per Keeping Children Safe in Education, September 2019 and details are recorded on the Single Central Record (SCR). They will receive safeguarding awareness training and be provided with contact details for the appropriate external agencies.

8.6. All staff
All staff are responsible for monitoring for signs and symptoms of abuse and neglect (see Appendix 3). They are also responsible for identifying and reporting to the Designated Safeguarding Lead all students who could benefit from early help.

All concerns must be reported in accordance with the local procedure on Raising Concerns.

In the event a staff member has concerns that another member of staff is not fulfilling their responsibility to follow safeguarding procedures, then this must be reported to the Principal or in their absence, Nominated Safeguarding Governor.

All other safeguarding allegations or suspicions of abuse relating to staff should be reported as per Section 9.2 of this policy.

All other concerns should be reported via the Study Group Whistleblowing Policy.

All staff should enable students to raise concerns. Please refer to the local procedure on Reporting Concerns Procedure for further information.

Staff must promote positive behaviour in students by setting an appropriate example and encouraging them to follow the Student Code of Conduct and by helping and encouraging them to stay safe. In the event misconduct occurs, the Student Disciplinary Procedures must be followed.
9. Raising concerns

All staff and students must be made aware of how to raise concerns which should include a variety of means i.e. SHARPS system, email, verbal or via CPOMS.

Please refer to the local procedures for Raising Concerns for information on how to raise a concern.

9.1. Allegations of abuse made against a student

Bellerbys College understands that students can abuse other students and as such is vigilant in identifying peer-on-peer abuse.

In these cases please refer to the Designated Safeguarding Lead as soon as practicably possible. Please refer to Section 1 of this Policy for contact information. The Designated Safeguarding Lead will manage the investigation and report to the local support services as appropriate. Both the victim’s and perpetrator’s report will be documented.

Please refer to local procedure for Reporting Concerns for information on how to raise a concern.

9.2 Allegations made against staff

Bellerbys procedures for managing allegations against staff (including the DSL) and volunteers follow DoE guidance and London Borough of Greenwich arrangements and apply when staff, including volunteers, have (or are alleged to have):

- Behaved in a way that has harmed a student, or may have harmed a student;
- Possibly committed a criminal offence against or related to a student; or
- Behaved towards a student in a way that indicated that they would pose a risk of harm if they were to work regularly or closely with children.

Allegations against any member of staff, whether currently employed or a former employee, (including historical allegations) will be handled in accordance with Part Four of Keeping Children Safe in Education, Sept 2019.

Any allegation of harm or abuse made against a staff member should be reported to the Principal or the Nominated Safeguarding Governor in the absence of the Principal as soon as possible after the allegation has been made. They must report the allegations to the LADO within one working day of the incident being raised as a concern.

In the event that an allegation is made against the Principal, the nominated Safeguarding Governor of the Bellerbys College Advisory Board (BCAB) should be informed immediately and without informing the Principal. The Nominated Safeguarding Governor will contact the LADO within one working day of the incident being raised as a concern. (Please refer to Section 1 of this Policy for contact details).

When allegations or suspicions of abuse are raised against a member of staff who is resident in the College, alternative accommodation will be provided.
No investigation will commence until an appropriate course of action has been agreed with the LADO. The Principal or the Nominated Safeguarding Governor should not seek to interview the children or members of staff involved until advice has been sought. Doing so may compromise any police interviews that may be necessary.

Where a student is at risk of immediate harm the police must be contacted.

Please refer to the local procedure for Raising Concerns Procedures for further information.

9.3 Reporting outside of the College
Anyone (staff, parents, students or members of the public) may share their concerns directly with external agencies such as children’s social care if they have concerns that there is a risk of immediate serious harm, without needing parental consent.

For concerns about an act of Female Genital Mutilation (FGM), please refer to Section 18 of this Policy.

9.4. Whistleblowing
Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College’s safeguarding regime.

Please refer to the Study Group Global Whistleblowing Policy for further details.

9.5. Investigation – students
Students will be supported throughout any investigation. This includes those that have reported concerns, those who have had a concern raised about them, and those who have had an allegation made against them. Parents will be contacted if deemed appropriate and with the student’s permission. Parental consent is not required to make a referral to the Statutory Agency

Please refer to local procedure on Supporting Students Through an Investigation for further information.

9.6. Malicious or unsubstantiated allegations
If an allegation made by a student who is aged under 18, is determined to be unsubstantiated or malicious, the Designated Safeguarding Lead should refer the matter to the children’s social care services to determine whether the student concerned is in need of services, or may have been abused by someone else.

Allegations deemed malicious may also be addressed via the appropriate disciplinary procedure.

9.7. Investigations – Staff
The College takes seriously its duty of care to all those who are involved in safeguarding issues, whether it is reporting a concern, acting as a witness or indeed being the subject of an allegation. During investigations any staff member involved will be provided with a named contact, obtainable from HR, who will provide each individual with confidential support, and progress updates where appropriate.
If a staff member is the subject of an allegation, the College’s primary duty of care must be to protect all students.

There will be no detrimental action taken against staff that raise or are the subject of genuine concern that turns out to be unfounded.

9.8. Referrals to the Disclosure and Barring Service and Teaching Regulation Agency
A referral to the Disclosure and Barring Service (DBS) will be made if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. This is a legal duty and failure to refer when the criteria are met is a criminal offence.

In the case of a member of teaching staff the matter may be referred to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.

Please refer to the Study Group Safer Recruitment Policy for more information.

10. Bullying
The College has a zero-tolerance policy on bullying, which applies to students and staff. Steps are taken to prevent it from occurring as well as to eradicate it if it does. Any bullying incident (including on-line bullying) will be treated as a safeguarding concern when there is reasonable cause to suspect the student is suffering or likely to suffer significant harm. Advice on this is informed by Preventing and tackling bullying: Advice for headteachers, staff and governing bodies, July 2017.

Bullying has serious consequences that can be physical, emotional or psychological. Some people who have been bullied have attempted suicide. The College has a commitment to the emotional wellbeing of its students and staff and therefore openly acknowledges the physical and emotional seriousness of bullying which can lead to psychological damage.

Concerns related to bullying should be raised as per Section 9.1

10.1. Definition of bullying
Bullying is the use of unwanted behaviour and/or actions to hurt another person either emotionally or physically with the outcome of causing pain and distress. Such behaviour can and frequently does continue over time to produce increasing levels of anxiety and suffering on the part of the victim. Bullying is often motivated by prejudice against particular groups and may occur both directly (e.g. face-to-face or via text or email communication) and indirectly (e.g. via postings on social media).

Please refer to Appendix 4 for examples of bullying, information of indications of bullying and prevention strategies.

10.2. Anti-bullying Code
In order to safely prevent bullying amongst students, Bellerbys College has an Anti-Bullying Code.

Please refer to local Anti-Bullying Code for more information.
10.3. Supporting students who are being bullied
Support is available for any student experiencing bullying. This will include help via the welfare team, personal tutor or any other appropriate member of staff, and where appropriate from external agencies.

Please refer to local Anti-Bullying Code.

10.4. Supporting the student accused of bullying
Students who bully their peers can potentially indicate that they are being subject to some form of abuse themselves and as such they will also be supported by the welfare team or any other appropriate member of staff.

Please refer to local Anti-Bullying Code.

11. Student whereabouts and attendance (Children Missing from Education)
Bellerbys College aims to know the whereabouts of all students who are under 18 or considered vulnerable during their stay and ensures that procedures are in place to monitor attendance, track trends and flag students who are ‘missing from education’ as this could be an indicator of potential abuse. These procedures are informed by the Children Missing Education: Statutory guidance for local authorities, September 2016.

Please refer to the local Attendance Procedure for information on attendance and monitoring.

Please refer to Missing Student Procedures for the steps required when a student is identified as ‘missing’.

12. Looked after children, children previously in care and care leavers
Bellerbys College recognises that children come to be looked after or go into (and leave) care as a result of abuse and/or neglect. In the event that a student is identified as a looked after child, has previously been looked after or is a care leaver then the Designated Safeguarding Lead along with the Welfare team will liaise with the appropriate local services.

Please refer to the local procedure for Raising Concerns regarding a child who may be or have been looked after.

13. Child Sexual Exploitation (CSE)
In the event a student is identified as possibly being a victim of child sexual exploitation, this should be referred to the Designated Safeguarding Lead who will refer the student to Brighton and Hove’s Children’s Services via the Front Door for Families hub (Appendix 1).
Please refer to the local procedure for *Raising Concerns* for more information on raising concerns related to Child Sexual Exploitation.

### 14. Child criminal exploitation: county lines

The College understands that students could be criminally exploited and that this may be missed because of the geography in which the criminal activity takes place. As a College with international students and although the *Keeping Children Safe in Education, September 2019* guidance advises action related to county lines, staff members at Bellerbys College are also vigilant to the potential for criminal exploitation on an international level.

In the event that a student is identified as being a potential victim of child criminal exploitation, possibly as part of a drug network or as part of a gang, a concern should be raised with the Designated Safeguarding Lead as per the local procedure for *Raising Concerns*.

#### 14.1 Serious Violence

The College understands that students could be involved in serious violent crime. In the event that a student is identified possibly as part of a drug network or as part of a gang, or involved in criminal activity, a concern should be raised with the Designated Safeguarding Lead as per the local procedure for *Raising Concerns*.

### 15. Domestic abuse/violence

The College does not condone domestic abuse and/or violence in any form and as such information is included in training for staff and in the Personal, Social, Health and Economic Education Programme (PSHE) for students.

Please refer to the local procedure for *Raising Concerns* for more information on raising concerns relating to domestic abuse and/or violence.

### 16. Homelessness

Bellerbys College provides accommodation for students either in the residences or in a homestay environment (please refer to Section 30 for more information) however some adult students chose to live in private accommodation. In the event that a student experiences problems which result in them becoming homeless, then support is available to them via College staff.

Please refer to Section 9 for more information on raising concerns relating to student homelessness.

### 17. Honour-based violence

In the event a student under the age of 18 is identified as possibly being a victim of honour based violence, this must be referred to the Designated Safeguarding Lead who will refer the student to the Brighton and Hove’s Children’s Services via the Front Door for Families hub (Appendix 1).
Please refer to the local procedure for Raising Concerns for information on raising concerns relating to honour based violence.

18. Female Genital Mutilation

The College is committed to ensuring that female students are safeguarded against FGM so staff who suspect that FGM has been carried out, or could potentially be carried out, must report these concerns to the Designated Safeguarding Lead (or their Deputy) who will immediately seek further advice from the MASH in Greenwich (Appendix 1).

In an emergency, the Police should be contacted on 999

If a teacher or regulated health and social care professional, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher or regulated health and social care professional must report this directly to the police as part of their statutory duty on the non-emergency Police telephone number, 101.

All other staff should report concerns relating to FGM in accordance with the local procedure for Raising Concerns.

19. Forced marriage

Bellerbys College understands that forced marriage is the result of violence, coercions and threats which can be physical, emotional or psychological. In the event that a concern or suspicion is raised regarding the potential for forced marriage for a student under the age of 18, then the Designated Safeguarding Lead along with the welfare team will work with local services to support the student. In the event that you have a concern relating to forced marriage, Please refer to the local procedure for Raising Concerns.

20. Radicalisation and the Prevent Duty

The College recognises the positive contribution it can make towards protecting its students from radicalisation to violent extremism. To that end, the College addresses key topics such as Fundamental British Values through PSHE, tutor periods and the College ethos. The College assesses the risk of the students being drawn into extremism and radicalisation, and takes appropriate steps to manage the risk.

All staff members undertake Prevent training every two years. Concerns resulting from changes in a student’s behaviour and language alongside the possible risk of becoming radicalised must be reported to the Designated Safeguarding Lead or Deputy immediately and they will seek advice from the Police and the Greenwich Prevent Lead, Heather Hutchins.

The Bellerbys London Prevent Lead is Yvonne Silk Jones, Director of Student Services. ysjones@studygroup.com or 0208 694 7016
The Local Greenwich PREVENT (Education) Officer is Heather Hutchins: Housing & Safer Communities, Royal Borough of Greenwich, Royal Borough of Greenwich, 4th Floor, Woolwich Centre, 35 Wellington Street, SE18 6HQ. Telephone number 020 8921 8325 or email heather.hutchings@royalgreenwich.gov.uk

Further information is available from:
- DfE Prevent helpline 020 7340 7264 or counter-extremism@education.gsi.gov.uk
- The police non-emergency number 101
- Crime stoppers 0800 555 111
- Anti-Terrorism Hotline 0800 789 321

20.1. Visiting Speakers
In the event an external speaker is invited to the College for teaching and learning purposes, staff must ensure that due diligence checks and risk assessments are in place in line with the Colleges Prevent Duty

20.2. Internet filtering and monitoring
The College understands that students should be safeguarded from potentially harmful and inappropriate online material; and has responsibilities under the Prevent Duty and Keeping Children Safe in Education for students and staff to use the internet responsibly. As such internet content is filtered through Smoothwall. The use of the internet is monitored with reports generated daily and concerns reported to the Designated Safeguarding Lead.

Please refer to the local Online Safety Procedure for further information

21. Peer on Peer Abuse
Bellerbys College adopts a protective ethos in which all forms of peer on peer abuse, including sexual violence and sexual harassment will not be tolerated.

It understands that students can abuse other students and that this could be a safeguarding concern. It is understood that abuse in any form is not tolerated and must not be passed off as a ‘joke’, as ‘banter’ or as part of ‘growing up’. Staff members are trained on child to child sexual harassment during safeguarding awareness training, in addition to the following:
- Bullying and cyberbullying
- Sexual violence and sexual harassment;
- Up skirting
- Physical abuse;
- Sexting (or youth produced sexual imagery);
- Initiation/hazing types of violence and rituals;
- Appropriate student relationships or teenage relationship abuse

All staff must be vigilant in identifying peer on peer abuse and raise a concern with the Designated Safeguarding Lead as soon as it is identified in accordance with the local Raising Concerns Procedure.
Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware "it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys" (Sexual violence and sexual harassment between children in schools and colleges, Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads, DFE, May 2018).

Other groups of students potentially more at risk include LGBTQ++ students and SEND students.

In the event that an incident is identified as peer on peer abuse then a referral will be made to external agencies, including the police or children’s social care (as appropriate to the local Children’s Safeguarding Board standards).

Please refer to local procedures on Minimising Peer on Peer Abuse.

### 22. On-line Safety

Bellerbys College makes every effort to protect students from the risks associated with the inappropriate use of all forms of electronic communication media within both the teaching and social context. Using advice on on-line safety which is informed by UKCCIS Advice on child internet safety 1.0: Universal guidelines for providers, the College:

- Provides a safe on line environment for our students;
- Assists and advises students on how to use electronic devices and social media responsibly via PSHE activities;
- All digital and electronic communication is done in a safe and secure environment;
- Emphasise the duty of care all members of staff have towards students in regard to the use of electronic media in the learning environment.

Please refer to local procedures on Online Safety.

Please note that all internet use is subject to the requirements of the Protecting children from radicalisation: the Prevent Duty, July 2015 and Keeping Children Safe in Education, Sept 2019. As such internet content is filtered and its use is monitored as per section 19.

#### 22.1. Email

Students are allocated College email addresses which must be used by both students and staff when communicating by email.

In an emergency situation, a member of the College Senior Leadership Team may authorise the use of all known email addresses.

#### 22.2. Social Media and digital communications

Social media and digital communications are used as part of the learning and social interactions with students however only via officially sanctioned sites which have been set up specifically for this purpose. Staff members must not link these sites to their personal accounts.

Please refer to the Study Group Use of Technology Policy.

#### 22.3. Mobile Phones

Students are able to use their mobile phones however on the condition that they are not used to:
Bully another person by sending of abusive or inappropriate messages including banter and using images to bully;

- Produce sexual imagery i.e. sending sexually explicit images of themselves to others (sometimes known as ‘sexting’);
- Forward on any inappropriate message or photograph to other students or friends;
- Send extremist messages aimed at radicalizing other students;
- Disrupt lessons.

For more information, please refer to the Behaviour Policy, the Student Code of Conduct and the Student Disciplinary Procedures.

22.4. Internet enabled devices

Internet enabled and “smart” devices include:

- Mobile phones, Phablets or Tablets;
- Games consoles;
- Internet enabled smart watches, ‘Kindle’ and similar devices;
- MP3 players;
- Smart TVs;
- Any other internet enabled personal devices.

Please refer to local procedures for Online Safety.

22.5. Websites

College websites and other information locations are frequently used to celebrate students’ work. However publication of any information on-line should always consider the implications for personal and College security.

23. Sexual Violence and/or sexual harassment

The College does not condone sexual violence and/or sexual harassment in any form and as such information is included in training for staff and in the PSHE programme for students.

Sexual violence includes rape, assault by penetration and sexual assault.

- Rape is when a person intentionally penetrates another’s vagina, anus or mouth with a penis, without the other person’s consent. Assault by penetration is when a person penetrates another person’s vagina or anus with any part of the body other than a penis, or by using an object, without the person’s consent.
- The overall definition of sexual or indecent assault is an act of physical, psychological and emotional violation in the form of a sexual act, inflicted on someone without their consent. It can involve forcing or manipulating someone to witness or participate in any sexual acts.
- Not all cases of sexual assault involve violence, cause physical injury or leave visible marks. Sexual assault can cause severe distress, emotional harm and injuries which can’t be seen – all of which can take a long time to recover from. This is why the Police use the term 'assault', and we recognise this and treat reports just as seriously as those of violent, physical attacks.
Sexual harassment includes comments, remarks, jokes, online sexual harassment, upskirting, sexting (youth produced sexual imagery) and potential initiation/hazing rituals.

Sexual harassment is a form of unlawful discrimination under the Equality Act 2010. The law says it’s sexual harassment if the behaviour is either meant to, or has the effect of:

- violating your dignity, or
- creating an intimidating, hostile, degrading, humiliating or offensive environment

Sexual harassment can be experienced by anyone of any gender and between genders.

Please refer to local procedure on Raising Concerns for more information on raising concerns related to sexual violence and/or sexual harassment.

24. Alcohol and substance misuse

Bellerbys College does not tolerate the misuse of alcohol or drugs (including legal highs) and as such is guided by Government Drug Strategy 2017. It also gives due regard to the Misuse of Drugs Act 1971 and the Psychoactive Substances Act, Jan 2016.

24.1. Drugs

The College does not condone the misuse or abuse of any drug at any time. This includes both illegal drugs as described by the Misuse of Drugs Act 1971 and drugs open to misuse such as psychoactive substances, ‘legal highs’ and solvents.

In the event that a student is found to have used or supplied drugs or there is sufficient evidence to assume or suspect drug taking has taken place then student will be dealt with under the Student Disciplinary Procedures. As a gross misconduct offence, disciplinary action could lead to expulsion.

If a student is caught in possession of a class A or class B drug then the relevant authorities will be informed in accordance with the Misuse of Drugs Act 1971.

Please refer to the Behaviour Policy for further information on searches and confiscation.

24.2. Drug testing

The College will not routinely undertake any form of drug testing.

In the event that a parent of a student who is under 18 specifically requests a drug test, this will be undertaken by an external agency.

24.3. Alcohol

The College does not condone the use of alcohol by any student under the age of 18. It is illegal for a person under 18 to purchase alcohol. In the event that a student under the age of 18 has been found to have consumed alcohol or staff are suspicious that alcohol has been consumed then this will be dealt with under the Student Disciplinary Procedures.
If a student over 18 has purchased alcohol for an underage student then staff must address this through the *Student Disciplinary Procedures*. Persistent offences will be considered gross misconduct and could result in exclusion.

24.4. Smoking
It is illegal to purchase tobacco products (including cigarettes and vaping products) for students under 18 years old. This includes all tobacco and vaping products. Students found to have done so will be addressed through the *Student Code of Conduct* and the *Behaviour Policy*.

24.5. Supporting students with substance misuse issues
Bellerbys College recognises that behaviour with regard to alcohol and illegal substances may be indicative of a psychological or emotional issue and as such key staff members are trained to look out for signs and symptoms of underlying issues.

Alcohol and drug awareness information is provided to students during PSHE sessions and they have access to help either in-college or via independent support and advice services.

Please see local procedure on *Raising Concerns* as to how to raise a concern relating to alcohol or substance misuse.

25. Fitness to study
Bellerbys College is committed to supporting students with health conditions (physical, mental and emotional) to achieve their best possible outcomes and will provide reasonable adjustments so that all students can access their learning and/or live safely within the accommodation (boarding and homestay) provided.

However, Bellerbys College also recognises that there will be instances where a student’s physical, mental or emotional health would give rise to concerns about the student’s fitness to study (or live safely within their accommodation). In these cases, the decision to defer the student’s course will sit with the Principal, with the assistance of the Welfare team and the Designated Safeguarding Lead. Deferment will result in a student returning home for care and support with a managed and risk assessed exit plan.

26. Equality and inclusion
Bellerbys College gives due regard to the *Equality Act 2010* and as such all members of the College community are expected to be familiar with our policy on equality and diversity and to uphold the principles set out within it. In addition, everyone is expected to take a role in promoting equality and embracing diversity.

Please refer to the *Study Group Equality and Diversity Policy* for further details.
British values are embedded into the college culture with key messages delivered within the PSHE programme. All students and staff are expected to positively promote these values and the Student Code of Conduct provides information as to the College’s expectation of tolerance and mutual respect.

In addition, resources and assistance are available to support students with specific religious, dietary, cultural and language needs.

26.1. Religion and belief
The College embraces and celebrates all religions, denominations and beliefs and makes practical provision for students to observe their religion or belief during the course of their stay. Students are allowed to engage in voluntary individual prayer as long as this does not compromise the College’s educational aims and their own or other students’ learning and development. Quiet rooms for students to pray in or conduct private contemplation are available on site where space allows. If space is unavailable, students will be permitted reasonable time to facilitate this activity as long as this does not compromise their curriculum obligations or creates a safety concern.

26.2. Cultural diversity
The College is proud of the wide cultural diversity of its students and takes steps to ensure that cultural differences are respected. It recognises the norms and customs associated with particular cultures and will ensure that students can observe and retain them wherever practicable during their time at the College. The College will host various cultural events to raise awareness and understanding of cultural diversity.

26.3. Dietary
The College aims to provide high quality catering with an appealing choice of food offered to students, staff, visitors and parents. Catering staff will also work with students to adjust the canteen arrangements to take into account any specific provision, if required, during Ramadan or any other religious festival. The college also provides for vegetarian diets, gluten free and Halal (Islam) and foods as required. Other dietary requirements should be discussed at the application stage, pre arrival.

Students choosing to fast for religious reasons will be supported and a risk assessment will be completed for students aged under 18 to help to ensure that they stay safe throughout.

When a student declares a food allergy or food intolerance they will be invited to meet with the Catering Department and Welfare staff so that appropriate arrangements can be made. The College is very aware of the dangers of food allergies and further advice and information is available from staff in the Catering Department. House Parents in Boarding will be made aware of any food allergies by the Welfare Team.

Please refer to the Care of Students with Health Conditions Policy for further information as to the support available for students who may suffer anaphylaxis as a result of food allergy.

26.4. Language Support
The College expects English to be spoken in communal areas, the classroom and the boarding facility. However, the College offers mother tongue language consultation during term time for a
variety of different languages depending on numbers involved and will also, where possible, provide translators for visiting parents. Where necessary the College will provide additional English support as part of the regular curriculum.

Please refer to local EAL Policy for further information.

27. Special Educational Needs and Disability (SEND)

Bellerbys College understands that students with special educational needs or disabilities can face additional safeguarding challenges and that there may be barriers to recognising some behaviour as an indication of abuse or neglect. As such, information to assist staff to recognise safeguarding concerns within this group is included in safeguarding awareness training.

Students with SEND are recognised as being potentially more vulnerable to peer on peer abuse and child sexual harassment

When a student is identified or is possibly identified as having a special educational need and/or disability then support is provided via the Learning Support Officer

Please refer to the local Special Educational Needs and Disability Policy and Procedures for more information.

28. Student Induction

All students are given a welcome pack and, for students staying in College residences, a residence handbook, and have a series of inductions when they first arrive at College. Handbooks and inductions cover the following areas:

- Bellerbys College Student Code of Conduct;
- Expectations of student behaviour and attitude to their studies;
- Specific rules, guidelines and procedures relating to general welfare and safeguarding, security, health and safety and to College residences;
- Information on other key College policies and procedures;
- A guide to who’s who in the College;
- Information about College facilities and resources, and enrichment and extra-curricular activities;
- Information relating to their academic programme and studies;
- Information relating to UK culture and integration into UK life;
- Information about the local area, use of local facilities and activities and places of interest outside of the College;
- Information on College-based and independent services available to offer advice on safeguarding and welfare matters and to support safeguarding and welfare needs that may arise;
- Information and assistance to support their financial, medical, social, cultural and religious needs.
29. Personal, Social, Health and Economic Education Programme (PSHE)
All students have PSHE education as part of their academic programme. The programme for PSHE changes throughout the year and is tailored to meet the needs of specific age groups.

The Programme ensures that students are provided with information materials to support them in keeping themselves safe from abuse, including abuse from their peers and online. This may include covering relevant issues through PSHE, tutorials, and through Sexual Relationships Education (SRE).

Please refer to local schemes of work for further information.

30. Care of Boarders
Bellerbys College has systems and processes in place to care for boarding students who are unwell in order to ensure:
- That boarders can seek assistance when they are unwell;
- Those boarders who are unwell are appropriately cared for during and outside of normal College hours.

Please refer to the local procedure for Care of Students with Health Conditions (including the Administration of Medicines) Policy for further information on the administration of non-prescription medications and homely remedies.

31. Staff
31.1. Staff recruitment
All staff are recruited according to the requirements of Keeping Children Safe in Education, September 2019. Please refer to the Study Group Safer Recruitment Policy for the full recruitment process for the following:
- Temporary and permanent staff, including part-time, ancillary and voluntary staff;
- Agency and contract staff, including part-time, ancillary and voluntary staff;
- Third party contractors.

The College ensures that sufficient relevant staff are trained in safer recruitment procedures.

All safer recruitment checks are recorded on a Single Central Record (SCR) for which the Principal is accountable. The SCR is audited bi-monthly for compliance and accuracy.

31.2. Staff training
All staff undertake Safeguarding Awareness training from the point of their induction which is updated regularly, at least every three years, so that they are confident about:
- The College’s legal and statutory responsibilities;
- Their personal responsibility;
- The College’s policies and procedures;
- The need to be alert to the signs and indicators of possible abuse, including possible child sexual exploitation, female genital mutilation, radicalisation, and peer-on-peer abuse;
- The need to record concerns;
- How to support and respond to a student who tells of abuse.
All staff will receive frequent, at least annually, safeguarding briefings and updates to ensure that their knowledge and practice is current.

31.3. **Staff Induction**

Bellerbys College ensures that every member of staff, the Governing Body and the Proprietor know who the Designated Safeguarding and Deputy are and the procedure for passing on concerns from the point of induction.

During the induction process, all staff members undergo safeguarding and child protection training.

All temporary and permanent full-time and part-time staff, including voluntary staff, and agency and contract staff receive a College induction appropriate to their role which includes but is not limited to the following items:

- Information on the identity and role of the Designated Safeguarding Lead and their Deputy;
- *Part 1 and Annex A of the Keeping Children Safe in Education* guidance 2019;
- Information on how and to whom concerns should be raised;
- Copies of the *Safeguarding Policy* and related welfare procedures;
- A copy of the *Study Group Staff Code of Conduct*, with specific reference to the *Study Group Use of Technology Policy*;
- A copy of the local procedure for *Missing Students*;
- A copy of the Bellerbys College Staff Handbook;
- A copy of the *Whistleblowing Policy*;
- Health and Safety training;
- Information on *Student Behaviour Procedures*.

Evidence that all induction activities have been completed is retained in personal staff files.

31.4. **Staff Conduct**

Staff are expected to set a good example at all times, and to ensure that their conduct does not pose any risk to the safeguarding and welfare of students.

In line with the *Sexual Offences Act 2003*, staff must not enter into a personal relationship with a student in any form. Communication with students must be via approved routes which includes the student email or official social media sites. There must not be any interaction with a student through unapproved means i.e. WhatsApp, Facebook or personal email accounts, except in an emergency situation when such contact is authorised by a member of the College Senior Leadership team.

Photographs or videos can only be taken for authorised purposes and only with the permission of the students concerned. Photographs and videos must not be posted on line unless it is with permission and for authorised purposes i.e. marketing.

For further information, all staff must follow the global *Study Group Staff Code of Conduct*. 
32. Homestay

Homestay accommodation is provided by local host families, managed by the Accommodation Officers. All homestay accommodation is assessed for suitability and homestay hosts undertake safeguarding awareness training every three years with additional updates on an annual cycle.

Homestay providers receive information and training regarding the safeguarding and welfare of the students they host and all members of the homestay household over 16 years of age have an enhanced DBS check, which is verified by the College. All homestay providers are required to provide details of any regular visitors who are also subject to an Enhanced DBS check.

Further safeguarding information and inspection visits, including a visit by the local council Social Care/Children’s Services team, are arranged for homestay providers and students if students are under the age of 16.

Full details regarding homestay safeguarding and welfare practices and provisions can be found in the Homestay Guidelines.

33. Visitors to the College

Bellerbys College is aware of the potential risks associated with visitors to the College and as such authorisation for visitors, including third party contractors and external speakers, should be sought prior to their arrival. Unless told otherwise, all visitors must be supervised whilst on college premises.

Those staff members arranging for visitors, including third party contractors and external speakers, are responsible for them throughout their visit and must ensure that they transit the college and associated premises in accordance with the local procedures unless vetting checks have been completed and recorded on the SCR.

Please refer to the Access to College Premises Policy for further information.

34. Off-site trips and visits

Off-site visits are planned and managed in accordance with Government advice provided in Health and Safety: Advice on Legal Duties and Powers, 2014.

A risk assessment in relation to each off-site visit must be completed by the Nominated Person (often the trip organiser or leader) before the visit takes place. The risk assessment must be completed in sufficient time for the appropriate parties to review and approve the risk assessment, and to expedite such actions as may be required.

Staff taking students off-site should follow the college procedure for planning educational trips and visits, and inform the Director of Student Services/Academic Director, the Attendance Officer and reception staff of the details of the visit as appropriate, including the names of all students involved. If students will not be returning to their residence or homestay at the usual time, the relevant House Parents and homestay families must also be informed.

Further details on can be found in SOP 71 (safe operative procedure) for off site excursions, trips and activities and the local procedure on Educational Visits.
35. Securing the views of students

Students are requested to provide their feedback about College policies, practices and provisions during the academic year through the student committees and student surveys.

36. Confidentiality, reporting and record keeping

All concerns, discussions and decisions made, including the reasons for these decisions, are recorded in writing. If staff are in any doubt about recording requirements, they should discuss this with the DSL or their Deputy.

All staff and volunteers adhere to confidentiality protocols and ensure that information is shared appropriately.

All records and any reports pertaining to safeguarding and child protection are stored securely by College staff with access restricted to those who need to know their content in order to ensure a holistic approach to the management of student safeguarding and welfare.

Students are advised that information they share may need to be shared with third parties where there may be a risk of a crime being committed or a risk of harm to themselves or others.

Staff must be made aware that, in the interests of safeguarding, confidential information can be shared regardless of a student’s requests for confidentiality, and where applicable guidance should be sought from the Designated Safeguarding Lead. Please refer to Section 1 for contact information.

The College ensure all relevant child protection records are sent to the receiving school or establishment when a pupil moves schools in accordance with Keeping Children Safe in Education (September 2019) and the Education Child Protection Record Keeping Guidance. The DSL will consider whether it would be appropriate to share information with the new school/college in advance of a child leaving.

The College ensure all actions and decisions are led by what is considered to be in the best interests of the child.

36.1. Data Protection

As part of Study Group, the College needs to collect and use certain types of information about people with whom it deals in order to operate. This includes personal information about current, past and prospective employees, suppliers, clients/customers, professional advisors and administrators, and other organisations with whom it communicates.

In addition, it may occasionally be required by law to collect and use certain types of information to comply with the requirements of Government departments for business data. This personal information should be dealt with properly in the manner it is collected, recorded and used, and this will be in line with UK data protection legislation.

Further details can be found in Study Group Data Protection Policy.
37. College Self Evaluation and Monitoring

The College monitors the implementation and outcomes of each of its policies and procedures during an annual self-evaluation cycle and carries out critical reviews and revisions to ensure that they are fit for purpose and that areas for improvement are identified. As part of the safeguarding governance structures, the College annual review is reported to the Bellerbys College Advisory Board as part of the annual review of safeguarding. This is signed off by Mike Everett, chair of Bellerbys Advisory College Board.

Audits look in detail at whether policies and procedures are being followed correctly and volume and content of the reports and records they generate.

The College Senior Management team also conducts regular reviews of College provisions against Boarding School National Minimum Standards and the Keeping Children Safe in Education, Sept 2019 guidance.

Whole College inspections are undertaken by an independent third party when deemed necessary as a further measure to ensure that we are meeting or exceeding the needs of our students.
### Appendix 1: Key contact information

Contact information for Bellerbys London Local Authority Designated Officers (LADO):

<table>
<thead>
<tr>
<th>Name</th>
<th>Catrin Gruffyd Jones</th>
</tr>
</thead>
<tbody>
<tr>
<td>Telephone number</td>
<td>020 8921 2351</td>
</tr>
<tr>
<td>Emergency telephone number</td>
<td>07566 287 413</td>
</tr>
</tbody>
</table>

Contact information for this College’s MASH for concerns about a child:

<table>
<thead>
<tr>
<th>Name</th>
<th>Multi Agency Safeguarding Hub</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address</td>
<td>Royal Borough of Greenwich, The Woolwich Centre, 35 Wellington Street, London SE18 6HQ</td>
</tr>
<tr>
<td>Telephone number</td>
<td>020 921 3172 Consultation Line - 0208 921 2267</td>
</tr>
<tr>
<td>Emergency telephone number</td>
<td>Out of hours on 020 8854 8888</td>
</tr>
<tr>
<td>Other information</td>
<td><a href="http://www.royalgreenwich.gov.uk">www.royalgreenwich.gov.uk</a></td>
</tr>
</tbody>
</table>

Contact information for this College’s Local Prevent Lead:

<table>
<thead>
<tr>
<th>Name</th>
<th>PREVENT Education Officer - Heather Hutchins</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address</td>
<td>Housing &amp; Safer Communities, Royal Borough of Greenwich, 4th Floor, The Woolwich Centre, 35 Wellington Street, SE18 6HQ</td>
</tr>
<tr>
<td>Telephone number</td>
<td>020 8921 8325</td>
</tr>
<tr>
<td>Emergency telephone number</td>
<td>07864694391</td>
</tr>
<tr>
<td>Other information</td>
<td><a href="mailto:heather.hutchings@royalgreenwich.gov.uk">heather.hutchings@royalgreenwich.gov.uk</a></td>
</tr>
</tbody>
</table>

Contact information for this College’s Local Contact Assessment Team for concerns about adults at risk:

<table>
<thead>
<tr>
<th>Name</th>
<th>Contact Assessment Team</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address</td>
<td><a href="mailto:aops.contact.officers@royalgreenwich.gov.uk">aops.contact.officers@royalgreenwich.gov.uk</a></td>
</tr>
<tr>
<td>Telephone number</td>
<td>020 8921 2304</td>
</tr>
<tr>
<td>Emergency telephone number</td>
<td>Out of hours on 020 8854 888.</td>
</tr>
<tr>
<td>Other information</td>
<td>Royal Greenwich Safeguarding Adults Board</td>
</tr>
</tbody>
</table>
Appendix 1a: Safeguarding flowchart

1. **Safeguarding or Child Protection concern**
   - Concern logged on CPOMS immediately and speak to DSL or DDSL in person (or Local Authority).
   - DSL will decide what action to take, which may include a Social Care referral or professional consultation with an external agency.
   - If the DSL/DDSL is uncontactable for any reason and you have immediate concerns - contact Safeguarding Team, Senior Leadership or Local Authority.

2. **Allegation made against an adult in a position of trust**
   - Concern reported to Principal and logged on CPOMS if appropriate.
   - If the concern is about the Principal, report to the Nominated Safeguarding Governor.

3. **Concerns discussed at MDT**
   - If necessary, an Early Help Assessment may be completed. For further advice contact the MASH 0208 921 2267, 020 8921 3172 or 020 8854 8888.

4. **No safeguarding concern, but emerging needs of the child/young adult indicate that additional services or support may be required**
   - Concern logged on CPOMS.
   - Concerns discussed at MDT.

5. **Safeguarding or Child Protection concern**
   - Concern logged on CPOMS immediately and speak to DSL or DDSL in person (or Local Authority).
   - DSL will decide what action to take, which may include a Social Care referral or professional consultation with an external agency.
   - If the DSL/DDSL is uncontactable for any reason and you have immediate concerns - contact Safeguarding Team, Senior Leadership or Local Authority.

DSL Yvonne Silk Jones, DDSL Fay McCormick (Deputy)

**Nominated Safeguarding Governor:** Durell Barnes (dbarnes@studygroup.com)
Appendix 2: Definitions of Abuse
The following (taken from KCSIE, September 2019) are definitions of the different types of abuse:

**Indicators of abuse and neglect**

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

42. Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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.

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

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

45. Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see paragraph 48).

46. Neglect: the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate
medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.
Appendix 3: Indicators of Abuse and Neglect

Taken from the NSPCC Child Protection fact sheet
KCSIE, September 2019

The physical signs of abuse may include:

- Unexplained bruising, marks or injuries on any part of the body
- Multiple bruises - in clusters, often on the upper arm, outside of the thigh
- Cigarette burns
- Human bite marks
- Broken bones
- Scalds, with upward splash marks, multiple burns with a clearly demarcated edge

Changes in behaviour that can also indicate physical abuse:

- Fear of parents being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example in hot weather
- Depression
- Withdrawn behaviour
- Running away from home

Changes in behaviour which can indicate emotional abuse include:

- Neurotic behaviour e.g. sulking, hair twisting, rocking
- Being unable to play
- Fear of making mistakes
- Sudden speech disorders
- Self-harm
- Fear of parent being approached regarding their behaviour
- Developmental delay in terms of emotional progress

The physical signs of sexual abuse may include:

- Pain or itching in the genital area
- Bruising or bleeding near genital area
- Sexually transmitted disease
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy

Changes in behaviour which can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home
- Sexual knowledge which is beyond their age, or developmental level
- Sexual drawings or language
- Bedwetting
• Eating problems such as overeating or anorexia
• Self-harm or mutilation, sometimes leading to suicide attempts
• Saying they have secrets they cannot tell anyone about
• Substance or drug abuse
• Suddenly having unexplained sources of money
• Not allowed to have friends (particularly in adolescence)
• Acting in a sexually explicit way towards adults

The physical signs of neglect may include:
• Constant hunger, sometimes stealing food from other children
• Constantly dirty or ‘smelly’
• Loss of weight, or being constantly underweight
• Inappropriate clothing for the conditions.

Changes in behaviour which can also indicate neglect may include:
• Complaining of being tired all the time
• Not requesting medical assistance and/or failing to attend appointments
• having few friends
• Mentioning being left alone or unsupervised.

Further information is available from:

https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/
Appendix 4: Bullying

Examples of bullying (not exhaustive)

- Physical: pushing, kicking, hitting, pinching or any other use of physical violence
- Verbal: name-calling, being sarcastic, spreading rumours, teasing, humiliating, intimidating, threatening
- Emotional: excluding, tormenting (e.g. hiding books, threatening gestures, being unfriendly)
- Racial: racial taunts, graffiti, gestures
- Sexual: unwanted physical contact, abusive comments, harassment (including up skirting)
- Homophobic: taunting a person on account of their sexual orientation
- Extortion: demanding money or personal belongings with threats
- Written: via text, email, social networks (cyberbullying)
- Digitally: pictures, videos

There are many signs that a student is being bullied which can include (not exhaustive):

- Fear or refusal to attend or leave college
- Unexplained deterioration in a student’s work
- Becoming withdrawn
- Loss of self-confidence and heightened anxiety
- Frequent mood swings
- Aggressive or disruptive behaviour
- Listlessness and lack of enthusiasm or motivation
- Sudden onset of stammering
- Frequent loss of books, possessions or clothing
- Loss of or stealing money (to pay the bully)
- Refuses or is frightened to say what is wrong
- Becomes distressed – cries easily, refuses to eat
- Weight gain or loss
- Visible injuries that are unexplained, unusual or recurring
- Suffering nightmares
- Self-harming, truancy and attempted suicide

Prevention of bullying

Examples of anti-bullying initiatives include (not exhaustive):

- Raising staff sensitivity to the signs and outward indications of bullying through staff training
- Ensuring that staff are aware that students with special educational needs (SEN) may not outwardly show signs of bullying
- Observing for changes in student behaviour
- Heightening student’s awareness of bullying through induction and PSHE
- Stressing the college’s values of mutual respect and tolerance to enable students to study and develop in a secure and relaxed environment
- Discussing with students related subjects such as racial tolerance, homophobia and sexual harassment
• Informing students of what is acceptable and unacceptable behaviour
• Providing forums where students can openly talk about bullying
• Incorporating bullying into key PSHE activities i.e. Student meetings (assemblies) or tutor sessions
• Ensuring that students and parents are able to raise concerns easily
• Anti-bullying Code