

BellerbysCollege

Safeguarding Policy


(Incorporating the Child Protection Policy)

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Last Updated: 04/08/2021

Owner: Director of Safeguarding, UK&EU

Policy:	Bellerbys Safeguarding Policy
Version:	1.3
Synopsis:	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.
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Publication	This policy is available to staff via our website www.bellerbys.com This policy is available to students, parents, and external parties via our website, www.bellerbys.com

<p>Mark Cunnington Chief Operating Officer</p>	<p> 31 August 2021</p>
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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

Brighton

Falls under the Brighton Safeguarding Children's Board and acts in accordance with locally agreed inter-agency procedures.

The Local Authority Designated Officer (LADO) for Brighton and Hove City Council can be contacted via telephone on 01273 295643 or 07795 335879. The LADO for Brighton is Darrel Clews.

Concerns about the welfare of a child can be passed to the appropriate local agency by contacting the Front Door for Families (FDFF) hub via:

FrontDoorForFamilies@brighton-hove.gcsx.gov.uk

Office hours: 01273 290400.

After hours: 01273 335 905 or 01273 335 906.

Address: Moulsecombe Hub North Hodshrove Lane, Brighton, BN2 4SE

Website: www.bhscp.org.uk

London

Falls under London Borough of Greenwich and acts in accordance with locally agreed inter-agency procedures.

The Local Authority Designated Officer (LADO) for Greenwich (Education) can be contacted via email to childrens-lado@royalgreenwich.gov.uk for concerns about staff working with children. The LADO role is shared between Rachel Walker, Laura Lumbis and Sharon Pearson.

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

Mash-referrals@royalgreenwich.gov.uk

Office hours: 0208 921 3172

After hours: 020 8854 8888

Consultation Line: 0208 921 2267

Address: First Floor, The Woolwich Centre, 35 Wellington Street, London, SE18 6HQ

Website: www.royalgreenwich.gov.uk

1.2. Local Agency contacts – Vulnerable Adults

Brighton

Brighton Adult Social Care Services can be contacted on Access Point via accesspoint@brighton-hove.gov.uk or 01273 295555

London

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 Nominated Safeguarding Lead for Study Group is Durell Barnes on dbarnes@studygroup.com

Brighton

Designated Safeguarding Lead: Anila Arshad-Mehmood, Associate Director of Student Services
anila.arshad-mehmood@studygroup.com
07825748128
Concernsbellerbysbrighton@studygroup.com

Deputy DSL: Kerry Joannides, Student Experience Manager (Residences)
kjoannides@studygroup.com

London

Designated Safeguarding Lead: Yvonne Silk-Jones, Director of Student Services
ysjones@studygroup.com
02038371920

Deputy DSL: Beverley Sutherland, Student Experience Manager (Residences)
bsutherland@studygroup.com
02038371908

2. Purpose

This policy supports Bellerbys College's 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 2021* and *Working Together to Safeguard Children, July 2018*; and is pursuant to *The Education (Independent School Standards) (England) Regulations 2014* and *DfE FE National Minimum Standards, 2018*.

The Senior Leadership Team (SLT) ensures that the College complies with its duties under the legislation below:

- Children Act 1989;
- Children Act 2004;
- Education Act 2002;
- Safeguarding Vulnerable Groups Act 2006;
- Education and Inspections Act 2006;
- Children and Young Persons Act 2008;
- School Staffing (England) Regulations 2009;
- Equality Act 2010;
- Education Act 2011;
- 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, which includes members of Bellerbys College Advisory Board (BCAB) and Study Group Ltd are required to read Part 1 and Annex B of *Keeping Children Safe in Education, September 2021*.

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:

- All students are safe;
- All staff and students can recognise welfare issues and the signs of abuse;
- All staff act according to the best interests of students;
- All welfare concerns are swiftly and efficiently identified and escalated to the appropriate member of staff (or where appropriate to an external agency);
- All Child Protection concerns are appropriately addressed as per current legislation;
- 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, learning difficulties, 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 principles:

- Safeguarding is everyone's responsibility;
- Staff understand that abuse in any form can happen within the College;
- Students feel safe and secure and protected from harm;
- Staff and students are vigilant of possible safeguarding issues and risks of harm;
- Staff and students have effective and various means to raise concerns;
- Staff and students are aware of how to access help, advice and support;
- Staff are aware of the importance of early help and how to access it;
- College buildings/residence facilities are safe places for students to learn and live;
- Staff are aware of and actively use the Safeguarding Policy and adhere to safeguarding procedures;
- 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;
- There are at least two emergency contact numbers for each student;
- The College Director 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 College is aware that a small proportion of students are 16 and 17 years old and therefore subject to Child Protection requirements as detailed within the *Keeping Children Safe in Education, Sept 2021* guidance.

All staff receive safeguarding awareness training which includes child protection, definitions of abuse and how to raise concerns about students to the Designated Safeguarding Lead. All staff are expected to read and understand Part 1 and Annex B of the *Keeping Children Safe in Education, Sept 2021* guidance.

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

Please refer to *Section 1* for key contacts relating to Child Protection.

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. It is also recognised that students can arrive with or develop mental health conditions whilst at Bellerbys College and that this adds to the vulnerability of students.

If 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.

Please refer to *Section 1.2* for key contacts relating to adult safeguarding.

8. Roles and responsibilities

8.1. Governing Body

The Proprietor of Bellerbys College is Study Group Ltd.

Study Group 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 2021* guidance.

Study Group undertakes an annual review of safeguarding arrangements which is signed off by Dr Mark Cunnington, Chief Operating Officer for Study Group Limited.

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

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 Lead") is Durell Barnes on dbarnes@studygroup.com.

8.2. Designated Safeguarding Lead

Bellerbys College has appointed two Designated Safeguarding Leads (DSL) from the Senior Leadership Team, one at each of the Bellerbys sites. In normal circumstances this is the Director of Student Services and the Associate 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 Leads (DDSL) assume their duties and responsibilities. On rare occasions when the DSL and the DDSLs are absent from college at the same time, staff should consider speaking to a member of the Safeguarding Team, the Senior Leadership Team or take advice from local Children's Social Care. In these circumstances, any action taken should be shared with the DSL or DDSLs as soon as is practically possible.

Both the Designated Safeguarding Leads and the Deputy Designated Safeguarding Leads are trained in higher level Safeguarding training, which is aligned to the local safeguarding partnership/multi-agency requirements. This is updated every two years. Both the Designated Safeguarding Leads and the Deputy Designated Safeguarding Leads 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 local strategic safeguarding partnerships and their approach to Prevent duties.

The Designated Safeguarding Leads have overall responsibility for the safeguarding and welfare of students at their designated site, including online safety. They are supported by other members of college staff, and are 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 Leads ensure:

- Staff members are aware that safeguarding is the responsibility of everyone;
- Staff members receive an induction that includes the *Safeguarding Policy*, the *Staff Code of Conduct*, and the identity of the Designated Safeguarding Leads and their deputies;
- All staff members read and understand their responsibilities under Part 1 and Annex B of *Keeping Children Safe in Education, Sept 2021*;
- Staff members understand the role of the Designated Safeguarding Lead and their deputies;
- Staff members are aware of and understand the procedures that support the *Safeguarding Policy*;
- Staff members are aware of the necessity of seeking early help;
- Staff members are aware of how to respond to and report concerns about children in line with *Working Together to Safeguarding Children, July 2019*;
- Staff members are aware of how to respond to and raise concerns about adult students in line with college policy;
- Staff members have access to advice and support on issues relating to child protection and adult vulnerability, with reference to protected groups such as learning difficulties and EAL;
- Staff members, including the College Director, complete safeguarding awareness training which is refreshed every three years;
- Staff members have completed Prevent training, either face to face or on-line;
- 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;
- Staff receive training in online safety;
- 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 Global

- Community Development programme or alternative;
- Any child or vulnerable adult in need is getting appropriate individual support, advice, and access to services;
- 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 and passed on to other provisions/educational establishments as required;
- They manage any referrals to statutory bodies because of abuse and assist others to fulfil their mandatory duties in this regard;
- 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 College Director and the Director of Safeguarding, ensure the Safeguarding Policy (and supporting policies) is reviewed, evaluated and revised annually.

The Designated Safeguarding Leads are also the local Prevent Leads for their sites. Please refer to *Section 22* for more information on the Prevent Duty and Radicalisation.

8.3. The Deputy Designated Safeguarding Leads

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

Please refer to *Section 1* for details of the Deputy Designated Safeguarding Leads.

8.4. Safeguarding Team

This includes those that are responsible for Welfare.

The Safeguarding Team includes the Designated Safeguarding Leads and their Deputies, as well as a Welfare Manager and Welfare Officer/s. The Safeguarding Team are responsible for supporting all students who have identified welfare needs, including ensuring that suitable referrals are made.

The work of the Safeguarding Team is supported by a weekly multi-disciplinary team meeting (MDT meeting) so a fuller picture of each student is known and acted upon as required. This includes, where relevant, early intervention for those students where safeguarding is required.

8.5. 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.

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 College Director or, in their absence, the Designated Safeguarding Lead.

All other safeguarding allegations or suspicions of abuse relating to staff should be reported as per *Section 1* of this policy.

All other concerns should be reported in accordance with the *Study Group Whistleblowing Policy*.

Staff must promote positive behaviour in students by setting an appropriate example and

encouraging them to follow the *Student Behaviour Charter* and by helping and encouraging them to stay safe. In the event misconduct occurs, the *Student Disciplinary Policy* must be followed.

9. Student disclosures

Staff members should be aware that, on occasion, students will raise issues or disclose very sensitive information relating to abuses they may have been victim to, current and/or historic. In these cases, the following principles apply:

- Reassure the student that it is safe for them to share information and act sensitively whilst the student talks;
- Inform the student that confidentiality cannot be promised but information may have to be shared on a need-to-know basis i.e. with the DSL;
- Do not interview the student or ask any leading questions;
- Let the student know who you will be sharing the information with and/or facilitate a direct referral if required.

The information is also included within the safeguarding awareness training.

10. Raising concerns

All staff and students must be made aware of how to raise concerns which should include a variety of means, i.e. by email, orally or via Progresso.

10.1. 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/s 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. All reports will be documented.

10.2. Allegations made against staff

Bellerbys procedures for managing allegations against staff (including the DSLs) and volunteers follow DfE guidance and Local Safeguarding Children's Partnership arrangements and apply when staff (including volunteers, supply and agency staff) have or are alleged to have:

- Behaved in a way that has harmed a child or may have harmed a child; or
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child in a way that indicated that they would pose a risk of harm if they were to work regularly or closely with children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work 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 4 of *Keeping Children Safe in Education, Sept 2021*.

Any allegation of harm or abuse made against a staff member must be reported to the College Director or, in their absence, the Nominated Safeguarding Lead as soon as possible after the allegation has been made. All allegations will be reported to the LADO within one working day of the incident being raised as a concern.

If an allegation is made against the College Director, the Nominated Safeguarding Lead must be informed immediately and without informing the College Director. The Nominated Safeguarding Lead will contact the LADO within one working day of the incident being raised as a concern. This will be formally recorded. If appropriate, the Nominated Safeguarding lead will escalate to the Proprietor in line with the *Safeguarding Escalation Policy*.

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 College Director or the Nominated Safeguarding Lead should not seek to interview the student or members of staff involved until advice has been sought as 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.

10.3. 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.

Please refer to *Section 1* for contact information on the relevant external agencies.

10.4. 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 *Whistleblowing Policy* for further details.

10.5. Investigation – students

Students will be supported throughout any investigation. This includes those who 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 a statutory agency.

10.6. 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/s should consider referring the matter to the Children's Social Care services to determine whether the student concerned needs services or may have been abused by someone else.

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

10.7. 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 everyone 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.

10.8. 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 engaged 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 *Safer Recruitment Policy* for more information.

11. 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.

Please refer to *Section 1* for referral information as to whom to raise a concern of bullying with.

11.1. 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 groups and may occur both directly (e.g., face-to-face, via social media messaging, via text or through 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.

11.2. 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. To safely prevent bullying amongst students, Bellerbys College insists on a community of respect and tolerance. Behaviour related to maintaining a college free from bullying is included in the *Student Behaviour Charter* and infraction is managed under the Student Disciplinary Policy. These are included in the *Student Handbook*.

11.3. 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.

12. Mental Health

The College recognises that it has an important role to play in promoting the health and welfare of students by supporting their mental health and wellbeing. It is understood that adolescence is a time of change, transition, and challenges; and that this can be exacerbated by a move to a new country, and a new culture. It is also understood that when young people can access effective mental health support this can improve academic achievement, social and emotional skills, reduce anxiety and stress, and positively affect poor attendance. Emotional wellbeing is a clear indicator of academic achievement, success, and satisfaction in later life.

Mental health is included within the safeguarding awareness training. There are also Mental Health First Aiders available if required. In addition, all staff members are made aware that:

- Mental health problems could be indicators of abuse (current and/or historic), neglect or exploitation;
- They must not diagnose but as they regularly see students they are therefore best placed to see changes in behaviour that could suggest a potential mental health problem;
- Abuse, neglect and childhood trauma can negatively affect the student's mental health, behaviour and education.

Please refer to the *Care of Students with Health Conditions Policy* for further information as to how students with mental health conditions are supported whilst at Bellerbys College.

13. Student whereabouts and attendance (Children Missing from Education)

Bellerbys College monitors 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 potentially missing.

Please refer to the *Student Whereabouts Policy* for the steps required when a student is identified as 'missing'.

If a student is missing for more than 10 days and the reason is unknown then the DSL will alert the Local Authority as per the *Children Missing Education: Statutory guidance for local authorities, September 2016*.

Please refer to the *Attendance Policy* for information on attendance and monitoring.

14. 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 because of abuse and/or neglect. If a student is identified as a looked after child, has previously been looked after or is a care leaver, the DSL along with the welfare team will liaise with the appropriate local services.

15. Child Sexual Exploitation (CSE)

Information regarding Child Sexual Exploitation is included in the Safeguarding Awareness training to all staff.

In the event a student is identified as possibly being a victim of child sexual exploitation, this must be referred to the Designated Safeguarding Lead who will refer the student to the relevant Children's Services.

Please refer to *Section 1* for the contact information.

16. 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 2021* guidance advises action related to county lines, staff members at Bellerbys College are also vigilant of the potential for criminal exploitation on an international level.

If 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.

17. Domestic abuse and/or 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 Global Community Development Programme (previously known as the PSHE Programme) for students. This includes RSE and Sexual Violence and Harassment content which is delivered regularly to both staff and students.

If there is a concern that a student is in an abusive relationship, then this should be raised to the DSL. Please refer to *Section 1* for contact details.

18. 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 choose to live in private accommodation. If a student experiences problems which result in them becoming homeless, then support is available to them via the college welfare team.

19. Honour-based abuse

Honour based violence (HBV) is a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

In the event a student is identified as possibly being a victim of honour-based abuse, this must be referred to the Designated Safeguarding Lead who will take advice from the relevant agency.

20. Female Genital Mutilation (FGM)

The College is committed to ensuring that female students are safeguarded against Female Genital Mutilation (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 local Multi-Agency Hub.

If a teacher, 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, then this must be reported to the Police as part of their mandatory duty.

21. Forced marriage

Bellerbys College understands that forced marriage is the result of violence, coercions and threats which can be physical, emotional, or psychological. If 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.

22. 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 (Global Community Development Programme), 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. 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 their Deputy immediately and they will seek advice from the Social Care Team, or the Police.

The Prevent Lead for Study Group is Sandy Connors, Director of Safeguarding UK & EU on sconnors@studygroup.com or 01273 005127.

The Local Prevent Coordinators are:

Brighton: Nahida Shaikh on nahida.shaikh@brighton-hove.gcsx.gov.uk or 01273 290584.

London: Heather Hutchings on heather.hutchings@royalgreenwich.gov.uk, 02089218325 or 079864694391.

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.

22.1. External 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 College's responsibility under the Prevent Duty and *External Speakers' Policy*.

22.2. 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, Sept 2021* 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.

23. Peer-on-Peer Abuse

Peer-on-peer abuse includes child-on-child 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 includes upskirting, which is commonly described as taking a picture under another person's clothing without their knowledge, and the sharing of nude photos. Upskirting and other forms of sexual abuse, violence and harassment are criminal offences.

Bellerbys College understands that students can abuse other students and that this could be a safeguarding concern. All staff members are vigilant as to all forms of peer-on-peer abuse and address behaviour as it happens, raising concerns to the DSL if required. It is understood that abuse in any form is not tolerated and must not be passed off as 'joking', as 'banter' or as part of 'growing up' and this forms part of the staff training which also includes:

- Child-on-child and peer-on-peer sexual harassment;
- Intimate personal relationships;
- Initiation/hazing behaviours;
- Bullying and cyberbullying;
- Sexual violence and sexual harassment;
- Inappropriate behaviour, such as upskirting;
- Physical abuse;
- Sexting (or youth produced sexual imagery) or sharing nude photos;
- 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.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware that some students are potentially more at risk: evidence shows girls, students with SEND and LGBTQ+ young people are at greater risk. Studies (*DfE May 2019*) indicate that more often victims of sexual violence and harassment are female, and perpetrators are more often male.

If 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 Safeguarding Partnership requirements).

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

24. Serious Violence

All staff are expected to look out for signs that a student is potentially at risk or involved in serious crime, and information is provided within the Safeguarding Awareness training to support this.

If a staff member has concerns relating to serious violence, then this must be raised to the DSL. Please refer to *Section 1* for contact information.

25. On-line Safety

The 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 online environment for our students;
- Assists and advises students on how to use electronic devices and social media responsibly via Global Community Development (PSHE) activities;

- Ensures all digital and electronic communication is used safely and securely;
- Emphasises the duty of care all members of staff have towards students regarding the use of electronic media in the learning environment.

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 2021*. As such, internet content is filtered and its use is monitored as per *Section 22*.

The College also educates staff and students of the dangers of online peer-on-peer abuse; sexual messaging and images including nude and indecent images; videos exchanged with or without consent; and the bullying and harassment associated with these. The College also acknowledges risks linked to online gaming and gambling and related social isolation.

25.1. Email

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

The use of personal email addresses is only permitted in emergency situations e.g. when a student is reported as missing, and only if preauthorised by a member of the College Senior Leadership Team (SLT).

25.2. 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* and *Social Media Policy* for more information.

25.3. Mobile Phones and Smart devices

Smart devices include:

- Mobile phones, Phablets or Tablets;
- Games consoles;
- Internet enabled smart watches, 'Kindle' and similar devices;
- MP3 players;
- Smart TVs.

Smart devices are often used to access online lessons but must be used responsibly. The camera must be switched on. If a student wishes to use a Smart device or a mobile phone in face-to-face lessons then permission must be sought from the teacher/tutor.

If a Smart device is used, then this is on the condition that it is not used to:

- Bully another person by sending of abusive or inappropriate messages including banter and 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 (including nude photos) to other students or friends;
- Send extremist messages aimed at radicalizing other students;
- Disrupt lessons.

For more information, please refer to the *Student Disciplinary Policy* and the *Student Behaviour Charter*.

25.4. Websites

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

Further information about the correct use of external websites and social media can be obtained via the marketing team.

26. Sexual Violence, sexual harassment and sexual misconduct

The College does not condone sexual violence, sexual harassment or sexual misconduct in any form and, as such, information is included in training for all staff and in the Global Community Development programme for students. Expectations of staff behaviour are in the *Global Code of Conduct*.

Whilst any report of sexual violence, sexual harassment or sexual misconduct must be taken seriously, all staff must be aware and vigilant of students who are potentially at greater risk, as evidence shows girls, students with SEND and LGBTQ+ young people are more likely to be targeted.

All incidents of sexual violence, sexual harassment and sexual misconduct involving a student under 18 will be reported to the Police and/or the local Children's Services. Incidents involving adult students will be referred subject to the wishes of the students and/or the risk to the student community.

Refer to Appendix 5 for more information.

27. 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 2010: Reducing Demand, Restricting Supply, Building Recovery and the ACPO drug advice for schools (issued September 2012)*. It also gives due regard to the *Misuse of Drugs Act 1971* and the *Psychoactive Substances Act, Jan 2016*.

27.1. 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.

If a student is found to have used or supplied drugs or there is sufficient evidence to reasonably assume or suspect drug taking has taken place, the student will be dealt with under the *Student Disciplinary Policy*. As a gross misconduct offence, disciplinary action could lead to the withdrawal from studies.

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 search and confiscation procedures for further information.

27.2. Drug testing

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

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

27.3. 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. If 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 Policy*.

If a student over 18 has purchased alcohol for an underage student, then staff must address this through the *Student Disciplinary Policy*. Persistent offences will be considered gross misconduct and could result in the withdrawal of studies.

27.4. 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 Behaviour Charter and the Student Disciplinary Policy*.

27.5. Supporting students with substance misuse issues

Bellerbys College recognises that behaviour relating to the use of alcohol and illegal substances may be indicative of a psychological or emotional issue and, as such, key staff members are trained to lookout for signs and symptoms of underlying issues.

Alcohol and drug awareness information is provided to students during Global Community Development (PSHE) sessions, and they can access help either in-college or via independent support and advice services.

Please refer all concerns about alcohol and substance misuse to a member of the Welfare Team.

28. Fitness to study

The College is committed to supporting students with health conditions (physical, mental and emotional) to achieve their best possible outcomes. If there is a concern regarding the ability of a student to study or live independently, please refer to the *Fitness to Study policy*.

29. Equality and inclusion

The College gives due regard to the *Equality Act 2010* and, as such, all members of the college community are expected to be familiar with the 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 *Equality and Diversity Policy* for further details.

British values are embedded into the college culture with key messages delivered within the Global Community Development (PSHE) programme. All students and staff are expected to positively promote these values and the *Student Behaviour Charter* 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.

29.1. 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 their stay. Students can engage in

voluntary individual prayer if 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, however this must not compromise their curriculum obligations or create a safety concern.

29.2. Cultural diversity

The College is proud of the wide cultural diversity of its student body 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.

29.3. Dietary

The College aims to provide high quality catering with an appealing choice of food offered to students, staff, visitors, and parents. Catering staff also work with students to adjust the canteen arrangements to consider any specific provision, if required, during Ramadan or any other religious festival. The College can accommodate vegan, vegetarian, Halal and Kosher diets and provide gluten free options as required.

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

When a student declares a food allergy or food intolerance, the catering team can make appropriate adjustments to menus and food items aligned to their specific need. The College is very aware of the dangers of food allergies and further advice and information are available from staff in the catering department.

29.4. Language Support

The College expects English to be spoken in communal areas, the classroom and the residence 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 the *English as an Additional Language Policy* for further information.

30. Learning Difficulties and Disability

Bellerbys College understands that students with learning difficulties and/or disabilities can face additional safeguarding challenges and that there may be barriers to recognising behaviours that may be indications of abuse or neglect. These students are recognised as being more vulnerable to peer-on-peer abuse and child-on-child sexual harassment. As such, information to assist staff to recognise safeguarding concerns within this group is included in safeguarding awareness training.

When a student is identified or is possibly identified as having a learning difficulty and/or disability then support can be requested via the welfare team or the personal tutor.

31. Student Induction

All students are given a welcome pack and have a series of inductions when they first arrive at the College. The information can then be found on the virtual reception (VR) by all students. The VR and inductions cover the following areas:

- *Student Behaviour Charter*;
- 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 to help students to build resilience to being groomed into abuse, exploitation, crime, extremism or radicalisation;
- Information and assistance to support their financial, medical, social, cultural, and religious needs.

32. Global Community Development Programme (PSHE)

All students receive PSHE education as part of their academic programme via the combined Global Community Development Programme. The programme 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 discussions on key themes in tutorials, as well as through Relationships and Sex Education (RSE).

Please refer to local schemes of work for further information.

33. Care of Residents

Bellerbys College has systems and processes in place to care for resident students who are unwell in order to ensure:

- Resident students can seek assistance when they are unwell;
- Resident students who are unwell are appropriately cared for during and outside of normal college hours.

Further information is available in the *Care of Students with Health Conditions Policy* and the procedures for the *Care of Students*.

34. Staff

34.1. Staff recruitment

All staff, including those that are permanent, temporary, part-time, volunteering or are supply, agency or contracted staff are recruited according to the requirements of *Keeping Children Safe*

in Education, Sept 2021. Please refer to the *Safer Recruitment Policy* for more information.

All recruiting managers are trained in safer recruitment. All safer recruitment checks are recorded on a Single Central Record (SCR) for which the College Director is accountable. The SCR is audited for compliance and accuracy.

34.2. Staff training

All staff undertake Safeguarding Awareness training in their induction. This is updated annually via safeguarding briefings and newsletters, and refreshed every three years, so all staff are confident with:

- The College's legal and statutory responsibilities;
- Their personal responsibility for safeguarding;
- 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;
- Reporting and recording concerns;
- How to support and respond to a student who tells of abuse.

34.3. Staff Induction

Bellerbys College ensures that every member of staff, the Advisory Board (BCAB) and Study Group Ltd (Proprietor) know the identity of the Designated Safeguarding Leads and their Deputies; and the procedure for passing on concerns from the point of induction.

During the induction process, all staff members undergo safeguarding awareness training that includes child protection. All safeguarding awareness training is initially completed online via the Ihasco programme and then followed up with face-to-face training in-centre. This is delivered by the Designated Safeguarding Leads.

All temporary and permanent, full-time and part-time staff, including voluntary staff, and agency, supply and contracted staff receive a college induction appropriate to their role via their line manager, which includes but is not limited to the following items:

- Information on the identity and role of the Designated Safeguarding Lead/s and their Deputy;
- *Part 1 and Annex B of the Keeping Children Safe in Education* guidance;
- Information and training about online safety;
- Information on how and to whom concerns should be raised;
- Copies of the *Safeguarding Policy* and related welfare procedures;
- A copy of the *Global Code of Conduct*, with specific reference to the *Use of Technology Policy*;
- A copy of the procedure for *Students Whereabouts*;
- A copy of the *Bellerbys College Staff Handbook*;
- A copy of the *Whistleblowing Policy*;
- Health and Safety training;
- Information on *Student Behaviour Charter* and the *Student Disciplinary Policy*.

Evidence of all completed induction activities are retained in personal staff files and logged on the central training log.

34.4. 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 e.g. 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 online unless it is with permission and for authorised purposes e.g. marketing.

For further information, all staff must follow the *Global Code of Conduct*.

35. 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.

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

36. 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, must 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 Procedure* for further information.

37. 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, 2018*.

A risk assessment in relation to each off-site visit must be completed 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, inform the attendance officer and reception staff of the details of the visit, including the names of all students involved. If students will not be returning to their residence or homestay at the usual time, the residence staff and/or homestay families must also be informed.

38. 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.

39. 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 Safeguarding Policy

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.

All actions and decisions are in the best interests of the student and as such students are advised that information they divulge 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 are 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.

If a student who is under 18 years old moves to another school, the College ensures all relevant child protection records are sent in accordance with *Keeping Children Safe in Education Sept 2021* 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.

39.1. 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*.

40. 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 (BCAB) as part of the annual review of safeguarding. This is signed off by Dr Mark Cunnington, Chief Operating Officer and member of Bellerbys Advisory College Board.

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

The College Senior Leadership Team also conducts regular reviews of college provisions against *National Minimum Standards for Residential Accommodation* and the *Keeping Children Safe in Education, Sept 2021* 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

Brighton

College's Local Authority Designated Officers (LADO)	Darrel Clews
Email Address	Darrel.Clews@brighton-hove.gov.uk
Address	C/O Whitehawk Community Hub 179A Whitehawk Road Brighton BN2 5FL
Telephone number	01273295643
Emergency telephone number	01273290400
Other information	Concerns about the welfare of a child can be passed to the appropriate local agency by contacting the Front Door for Families, which is set up to specifically receive referrals about child safeguarding concerns, on 01273290400 or FrontDoorForFamilies@brighton-hove.gcsx.gov.uk

London

College's Local Authority Designated Officers (LADO)	Rachel Walker Laura Lumbis Sharon Pearson
Email Address	childrens-lado@royalgreenwich.gov.uk
Address	First Floor, The Woolwich Centre, 35 Wellington Street, London, SE18 6HQ
MASH – concerns about the Welfare of a Child	Concerns about the welfare of a child can be passed to the appropriate local agency by contacting the MASH team, which is set up to specifically receive referrals about child safeguarding concerns, on 0208 921 2267 or www.royalgreenwich.gov.uk The emergency number is 0208 921 3172

Appendix 1a: Safeguarding flowchart-



Appendix 2: Definitions of Abuse

The following (taken from *KCSIE, September 2021*) are definitions of the different types of abuse.

Indicators of abuse and neglect

22. **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.

23. **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.

24. **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.

25. **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 29).

26. **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, because 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.

Appendix 3: Indicators of Abuse and Neglect

Taken from the *NSPCC Child Protection fact sheet KCSIE, September 2021*

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, upskirting
- 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)
- Digital: 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)
- Refusal to say or fear of saying what is wrong
- Distress – crying easily, refusing 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 students' awareness of bullying through induction and PSHEE and Global Community Development
- 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 open talk about bullying
- Incorporating bullying into key Global Community Development activities e.g. Student meetings (assemblies) or tutor sessions;
- Ensuring that students and parents can raise concerns easily
- Introducing an Anti-bullying Code

Appendix 5: Sexual Violence and Harassment

Please refer to section five of KCSIE 2021 for Child on Child (peer on peer) Sexual violence and sexual harassment guidance and Sexual violence and sexual harassment between children in schools and colleges September 2021

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

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe.

Bellerbys maintains a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable, and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

Sexual violence may include rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence).

Sexual harassment may include sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse. Other examples of Sexual Violence or Harassment may be:

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
Upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm;
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery); the policy should include the school or college’s approach to it;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

Useful Resource:

<https://www.stopitnow.org.uk/concerned-about-a-child-or-young-persons-sexual-behaviour/preventing-harmful-sexual-behaviour/>