

## The Safeguarding and Child Protection Policy and Procedures

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Ampleforth College

Person(s) responsible for Policy	Head Designated Safeguarding Lead (DSL)
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### **6 KEY ELEMENTS OF OUR APPROACH TO SAFEGUARDING**

- Safeguarding and promoting the welfare of children is everyone's responsibility;
- Ensure immediately the safety of the student - if there is an immediate danger contact the DSL or North Yorkshire Council Emergency Duty Team and /or Police ([contact numbers here](#));
- Ensure the student receives medical treatment, if necessary;
- Listen without interrupting or asking leading questions. Do not investigate. [See the Six Rs flowchart](#)
- Do not promise confidentiality
- Inform the DSL/DDSLs and [record details](#) of events and actions on the College's safeguarding platform (CPOMS) or using the [Safeguarding Concern Reporting form](#).

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## 1. PURPOSE OF THE POLICY

- This policy applies to all staff, visitors and volunteers at Ampleforth College (the College) and is designed to ensure the welfare of students and visiting young people both at the College and on authorised activities away from the College such as school trips and expeditions. The policy is reviewed and updated annually or when required by legislative change.
- We operate our safeguarding processes with the best interests of the student at their heart. We are proud to operate a culture of safety, equality, openness and protection. We manage this by encouraging students to be open and frank about their concerns and providing support for them from the safeguarding team or other responsible adults, such as their Housemasters and Mistresses and tutors, in all child protection and safeguarding matters.
- There is an important distinction between action required to ensure the welfare of children who need additional support and urgent action to safeguard children who have suffered or are likely to suffer significant harm. If a child is in immediate danger or is at risk of harm, contact the DSL or ring North Yorkshire Council (NYC) Emergency Duty Team and / or the Police immediately ([contact numbers here](#)). **Anyone can make a referral** although the Designated Safeguarding Lead must be informed as soon as possible that a referral has been made.
- Staff must give due concern to possible safeguarding issues arising out of the location and nature of the College site. Training and risk assessments promote and inform this.
- References to other College policies or procedures in this policy should be read as references to those policies or procedures from time to time in force (and as amended or superseded).
- This policy gives very clear instructions regarding what you must do if you hear or see anything which gives you concern that a student at the College may be at risk of harm. See the four flowcharts
  - [The Six Rs](#)
  - [What to do if you suspect a pupil is suffering or likely to suffer harm](#)
  - [How to report on the safeguarding platform \(CPOMS\)/reporting form](#)
  - [How to report a concern about a member of staff](#)
- Guided by Keeping Children Safe in Education (KCSIE 2023), we use the terms “**must**” and “**should**” throughout this policy. We use the term “must” when the person in question has a legal or regulatory requirement or where you are required to behave in a certain way, and use “should” when the guidance/advice in this policy should be followed unless there is good reason not to (and in any such cases, you are required to record on the College’s safeguarding platform (CPOMS), or using the Safeguarding Concern Reporting Form why you have deviated from this policy).

## 2. DEFINITION OF SAFEGUARDING

- Safeguarding and promoting the welfare of children is defined in the Department for Education's KCSIE (2023) as:
  - protecting children from maltreatment
  - preventing impairment of children's mental and physical health or development
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care
  - and taking action to enable all children to have the best outcomes.
- The College fully recognises its responsibility to safeguard and promote the welfare of all its students. Schools, colleges and their staff have an important role in the wider legislative and regulatory framework which seeks to promote the welfare of all children. **Safeguarding and promoting the welfare of children is everyone's responsibility.** In order to fulfil this responsibility effectively, we make sure our approach is **child-centred**. This means that we consider, at all times, what is in the **best interests of the child**.
- Every student should feel safe and protected from any form of abuse which, in this policy, means any kind of physical abuse, emotional abuse, sexual abuse or neglect. All children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality, or beliefs. No child or group of children should be treated any less favourably than others in being able to access services which meet their particular needs.
- The College fully recognises its duty to reassure victims that they are being taken seriously and that they will be supported and kept safe; and that a victim should never be given the impression that they are creating a problem by reporting any form of abuse; and nor should a victim ever be made to feel ashamed for making a report.

## 3. MISSION STATEMENT

The first word of the rule of St Benedict is 'listen'. Staff must make time to listen to students' concerns in order to protect them and ensure that they flourish. As Pope Francis has stated, the effective protection of children and a commitment to ensure their human and spiritual development, in keeping with the dignity of the human person, are integral parts of the Gospel message that the Church and all members of the faithful are called to spread throughout the world. Staff must take a child-centred approach and ensure that students have a voice and are able to express any concerns that they may have. Staff must take an **'it could happen here'** approach and must always take the concerns of students seriously. Safeguarding trumps everything else – adults must, without fail, make time to listen to any student who shows signs of distress or who wishes to confide in them. Safeguarding is the responsibility of all adults in the College. The nature of our provision and our location must be taken into account by staff. The following provide some key examples:

- Boarding school: our 24/7 responsibility for our boarders in term time.

- Rural location: the more remote location of the College provides many opportunities and intrinsic protective factors; however, the large campus and specific opportunities for sports and cocurricular activities which this brings is associated with additional risk which must be considered appropriately.
- Shared facilities – students access the St Albans Sport Centre and the Ampleforth Abbey Church which are both used by the public. Risk assessments are in place to help manage safeguarding.
- Proximity to public areas: the campus is adjacent to Ampleforth Abbey and Monastery which includes a retreat centre. There is a public footpath which runs adjacent to the sports fields. There are specific policies and risk assessments in place to help manage safeguarding risks arising out of this proximity.

We are committed to ensuring the following at the College with regards to safeguarding:

- All students at the College are and feel safe, secure and listened to
- Staff/volunteers understand the safeguarding policy; are confident in and understand how to report concerns; they understand the student behaviour policy and the staff code of conduct
- Staff understand that in ‘exceptional circumstances’ they must report concerns directly to NYC Emergency Duty Team or the Police (see here)
- All staff are able to identify welfare concerns among students and to identify students who need additional support
- Safeguarding issues are part of the planned curriculum. Through Christian Living (PHSE) topics, tutorials, and discussions in Houses, students gain an understanding of what constitutes acceptable or unacceptable behaviour on the part of adults or other students. We support them in developing their own self-confidence and assertiveness, including awareness of the age of consent and abuse of trust. They are informed about this policy and of the various sources of help available at school – including the DSL and Deputy Designated Safeguarding Leads (DDSLs), the Infirmary, School Counsellors, House Chaplains, the College’s Independent Listeners, Housemasters and Housemistresses, Matrons, Tutors and other staff.
- Relationships and Sex Education (RSE) is embedded within the Christian Living programme. RSE aims to support young people through their physical, emotional and spiritual development, helping them make the transition from childhood through adolescence to adulthood, with confidence. The programme guides students towards responsible and informed decisions on leading healthy, respectful and independent lives and refers at all times to the teaching of the Church on love, commitment, acceptance and inclusion. The importance of loving friendships and understanding of the qualities of lasting friendship, which include attributes such as consent, conflict resolution and discretion, are emphasised. The personal and social skills that are required for healthy relationships such as managing emotions, empathy for others and awareness of prejudice (including on LGBT issues) are developed throughout the curriculum. The curriculum also offers guidance on identifying toxic relationships, coercion,

abuse and harassment and child-on-child abuse. Students are supported in learning to value and respect each person as a unique individual of equal worth.

- Each house has a student mental health mentor who has undergone Mental Health training and School Monitors who have undergone safeguarding training. House deanery groups provide an additional safe-space for discussion. Students are also made aware of external sources of support, including Childline and the NSPCC.

#### **4. STATUTORY DUTY**

This policy has been drafted to have regard to Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014.

Other key legislation and guidance include:

##### **Primary Legislation**

- [Children Act \(1989\)](#)
- [The Human Rights Act \(1998\)](#)
- [Education Act \(2002\)](#)
- [Sexual Offences Act \(2003\)](#)
- [Children Act \(2004\)](#)
- [The Equality Act \(2010\)](#)
- [Counter-Terrorism and Security Act \(2015\)](#)
- [Serious Crime Act \(2015\)](#)
- [Children and Social Work Act \(2017\)](#)
- [Data Protection Act \(2018\)](#)

##### **Official guidelines from HM Government**

- [Education \(Pupil Registration\) Regulations \(2006\)](#)
- [What to do if you're worried a child is being abused \(HMG, 2015\)](#)
- [The Prevent Duty: Departmental advice for schools and childcare providers \(DfE 2015\)](#)
- [Children Missing Education \(DfE 2016\)](#)
- [Preventing and Tackling Bullying \(DfE, 2017\)](#)
- [The Designated Teacher for looked after and previously looked-after children: Statutory guidance on their roles and responsibilities \(DfE, 2018\)](#)
- [Searching, screening and confiscation \(DfE, 2018\)](#)
- [Working Together to Safeguard Children \(HMG, 2018\)](#)
- [Information sharing advice for safeguarding practitioners \(HMG, 2018\)](#)
- [Mental Health and Behaviour in Schools \(DfE, 2018\)](#)

- [Teaching Online Safety in School \(DfE 2019\)](#)
- [Home Office: Domestic Abuse, Statutory Guidance \(July 2022\)](#)
- [Working Together to Improve School Attendance \(2022\)](#)
- [National Minimum Standards for Boarding \(2022\)](#)
- [Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings \(DfE 2022\)](#)
- [Home Office Information guide: adolescent to parent violence and abuse \(APVA\)](#)
- [Meeting Digital and Technology Standards in Schools and Colleges \(DfE, 2023\)](#)
- [Keeping Children Safe in Education \(DfE 2023\)](#)

### **North Yorkshire Safeguarding Children Partnership and Council guidance**

- [North Yorkshire Safeguarding Children Partnership \(NYSCP\) Safeguarding Procedures and Practice Guidance](#)
- [North Yorkshire Council Ladder of Intervention; supporting children and young people with Social, Emotional and Mental Health Difficulties in Schools \(Sep 2019\)](#)
- [North Yorkshire Community Safety Partnership Working with Individuals Vulnerable to Extremism \(2019\)](#)
- [NYSCP: Managing Allegations against those who volunteer or work with children \(2020\)](#)
- [NYSCP: Framework for decision-making: Right help, at the right time by the right person \(Threshold Guidance\) \(2022\)](#)

### **Approved guidance from other agencies**

- [Independent School Standards Regulations 2019 \(ISSRs\) – statutory regulations](#)
- [When to Call the Police, Guidance for Schools and Colleges \(NPCC, 2020\)](#)
- [Sharing Nudes and Semi-Nudes: Advice for education settings working with children and young people; Responding to incidents and safeguarding children and young people \(UKCIS, Dec. 2020\).](#)
- [Guidance for Safer Working Practice for Adults who work with Children and Young People in Education \(2022\)](#)

## **5. SAFEGUARDING CONTACT DETAILS**




The College's Designated Safeguarding Lead (DSL) is Dr Alastair Dunn. He is the primary point of contact for any safeguarding matter relating to students. He is also responsible for Online Safety, is the Prevent Officer and the Key Adult for Operation Encompass Notifications. If he is not available,







one of the Deputy DSLs listed below are the next points of contact where you have concerns about a child. If, for any reason, contact fails, and you are concerned that a student is in immediate danger, you must contact NYC Emergency Duty Team and /or the Police immediately ([contact numbers here](#)).

The table below also provides details of the Designated Teacher for Children with Looked After Needs, John Devitt. He has overall responsibility for their welfare and progress. In addition to this, he will have up to date assessment information from the relevant local authority, their most recent care plan and contact arrangements for parents and carers.

Finally, where staff have concerns about a member of staff and their behaviour or conduct towards a child, they must contact the Head (as below) and if the concern is about the Head, staff must contact the Chair of Governors (through the Clerk) ([see the flowchart here](#)). (Further guidance on determining whether a concern about a staff member reaches the LADO harms threshold, or whether it is a Low-Level concern, can be found [below](#).)

Role	Name	Contact Details
<b>Designated Safeguarding Lead (DSL)</b>	<b>Dr Alastair Dunn</b>  	alastair.dunn@ampleforth.org.uk  Telephone number (term time): 01439 766 077  Mobile number (term time): 07896 006 862  Out of hours/term contact number: 07896 006 862
<b>Deputy Designated Safeguarding Lead (DDSL)</b>	<b>Jon Mutton</b>  <b>(Deputy Head Pastoral, Wellbeing and Online Safety)</b>  	jon.mutton@ampleforth.org.uk  Telephone number (term time): 01439 766434  Mobile number (term time): 07780 956 368  Out of hours/term contact number: 07780 956 368
<b>Deputy Designated Safeguarding Lead (DDSL)</b>	<b>Miriam Cook</b> <b>Assistant Head, Pastoral &amp; Behaviour</b>  	miriam.cook@ampleforth.org.uk  Telephone number (term time): 01439 741116  Mobile number (term time): 07581 044842  Out of hours/term contact number: 07581 044842

<b>Deputy Designated Safeguarding Lead (DDSL)</b>	<b>Catherine Skinner</b>  	catherine.skinner@ampleforth.org.uk  Telephone number (term time): 01439 741114  Mobile number (term time): 07866 127228
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<b>Designated Teacher for Looked After Children</b>	<b>John Devitt</b>  <b>(Deputy Head Academic)</b>  	john.devitt@ampleforth.org.uk  Telephone number (term time): 01439 766733  Mobile number (term time): 07976 795345  Out of hours/term contact number: 07976 795345
<b>Where a concern is about a member of Staff</b>		
<b>Head</b>	<b>Peter Roberts</b>  	Head@ampleforth.org.uk  Telephone number (term time) 01439 766880
<b>Where a concern is about the Head</b>		
<b>Chair of Governors</b>	<b>Edward Sparrow</b>  	c/o Clerk to the Governors Mrs Hester Sowerby hes@ampleforth.org.uk  Telephone number: 01439 766000

## 6. EXTERNAL CONTACTS IN THE EVENT YOU NEED TO TAKE URGENT ACTION

If there is an immediate risk of harm to children call North Yorkshire Police	<b>999</b> or 101
North Yorkshire Safeguarding Children Partnership ( <i>for concerns about a child</i> )	<b>0300 131 2 131</b> <a href="mailto:social.care@northyorks.gov.uk">social.care@northyorks.gov.uk</a>
North Yorkshire Council Local Authority Designated Officer (LADO) ( <i>for concerns about a staff member or volunteer</i> )	<b>01609 533080</b> lado@northyorks.gov.uk
North Yorkshire Early Help - Ryedale	01609 534852

Children Missing in Education	<a href="mailto:Safeguardingunit@northyorks.gov.uk">Safeguardingunit@northyorks.gov.uk</a> 01609 532477
School Attendance – Ryedale	Victoria Nightingale 07989727550 victoria.nightingale@northyorks.gov.uk
Virtual School	Headteacher Julie Bunn <a href="mailto:virtualschool@northyorks.gov.uk">virtualschool@northyorks.gov.uk</a> 01609 532169 07974 176030
Prevent Channel (countering radicalisation and extremism)	Principal Safer Communities Officer (Community Safety and Prevent) Lesley Gray <a href="mailto:lesley.gray@northyorks.gov.uk">lesley.gray@northyorks.gov.uk</a> Tel: 01609 533487  Non-emergency DfE advice Tel: 0207 340 7264 Email: counter-extremism@education.gsi.gov.uk
Operation Encompass (Domestic Violence)	Helen Graham MAST Administration Officer, North Yorkshire Children and Families Service, County Hall, Northallerton, North Yorkshire DL7 8AD Tel: 101. Option 2, then dial 35355 MAST office 01609 643573 (internal 13573)

IDAS (Independent Domestic Abuse Service)	Tel: 03000 110 110 <a href="https://www.idas.org.uk/">https://www.idas.org.uk/</a>
CEOP (National Crime Agency Child Exploitation and Online Protection)	<a href="https://www.ceop.police.uk/Safety-Centre/">https://www.ceop.police.uk/Safety-Centre/</a>
UK Safer Internet Centre	Tel: 0344 381 4772  Email: <a href="mailto:helpline@saferinternet.org.uk">helpline@saferinternet.org.uk</a>



### Useful contacts for children and young people

ThinkUKnow (online safety)	<a href="https://www.thinkuknow.co.uk/">https://www.thinkuknow.co.uk/</a>
Childline	Tel: 0800 11 11 <a href="http://childline.org.uk">childline.org.uk</a>
Young Minds Text service	Text YM to 85258  <a href="https://youngminds.org.uk/find-help/get-urgent-help/youngminds-crisis-messenger/">https://youngminds.org.uk/find-help/get-urgent-help/youngminds-crisis-messenger/</a>
Compass Phoenix (North Yorkshire's free, confidential health and wellbeing counselling service)	Tel: 01904 661916 Tel: 0800 008 7452 Email: <a href="mailto:phoenix@compass-uk.org">phoenix@compass-uk.org</a>  <a href="https://www.compass-uk.org/services/compass-phoenix/">https://www.compass-uk.org/services/compass-phoenix/</a>
Papyrus (suicide prevention for young people)	Tel: 0800 0684141 Text: 07860 039 967 Email: <a href="mailto:pat@papyrus-uk.org">pat@papyrus-uk.org</a>
Samaritans	Tel: 116123  <a href="https://www.samaritans.org/how-we-can-help/contact-samaritan/">https://www.samaritans.org/how-we-can-help/contact-samaritan/</a>
Office of the Children's Commissioner	Tel: 0800 528 0731
Cyber Choices Programme (National Crime Agency programme to divert young people from online criminality)	<a href="https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices">https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices</a>

### Whistleblowing

NSPCC Whistleblowing helpline	Tel: 0800 028 0285 Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
Charity Commission	Email: <a href="mailto:whistleblowing@charitycommission.gsi.gov.uk">whistleblowing@charitycommission.gsi.gov.uk</a>

## 7. KEY GOVERNORS

<b>Chair of Governors</b>	<b>Edward Sparrow</b>  c/o Clerk to the Governors Mrs Hester Sowerby hes@ampleforth.org.uk  Telephone number: 01439 766000
<b>Nominated Safeguarding Governor</b>	<b>Mrs Sarah Sadler</b>  ssa@ampleforth.org.uk  Telephone number: c/o 01439 741113

## 8. REPORTING AND RECORD KEEPING

Any safeguarding concern about a student (other than as set out below in cases of suspected immediate risk of harm) must be logged on the College’s safeguarding platform (CPOMS) or reported using the [Safeguarding Concern Reporting Form](#) (see [flowchart](#) below). The DSL or one of the DDSLs will then triage it (decide the priority level) by allocating it a case manager.

If staff feel a student is **at risk of immediate harm** they must contact the DSL directly by phone, Teams or in person without delay, and before logging it on the College’s safeguarding platform (CPOMS); or staff can make an immediate referral to NYC Emergency Duty Team and/or the Police [[see contact details here](#)] **Anyone can make a referral**. Staff must inform the DSL as soon as possible that a referral has been made.

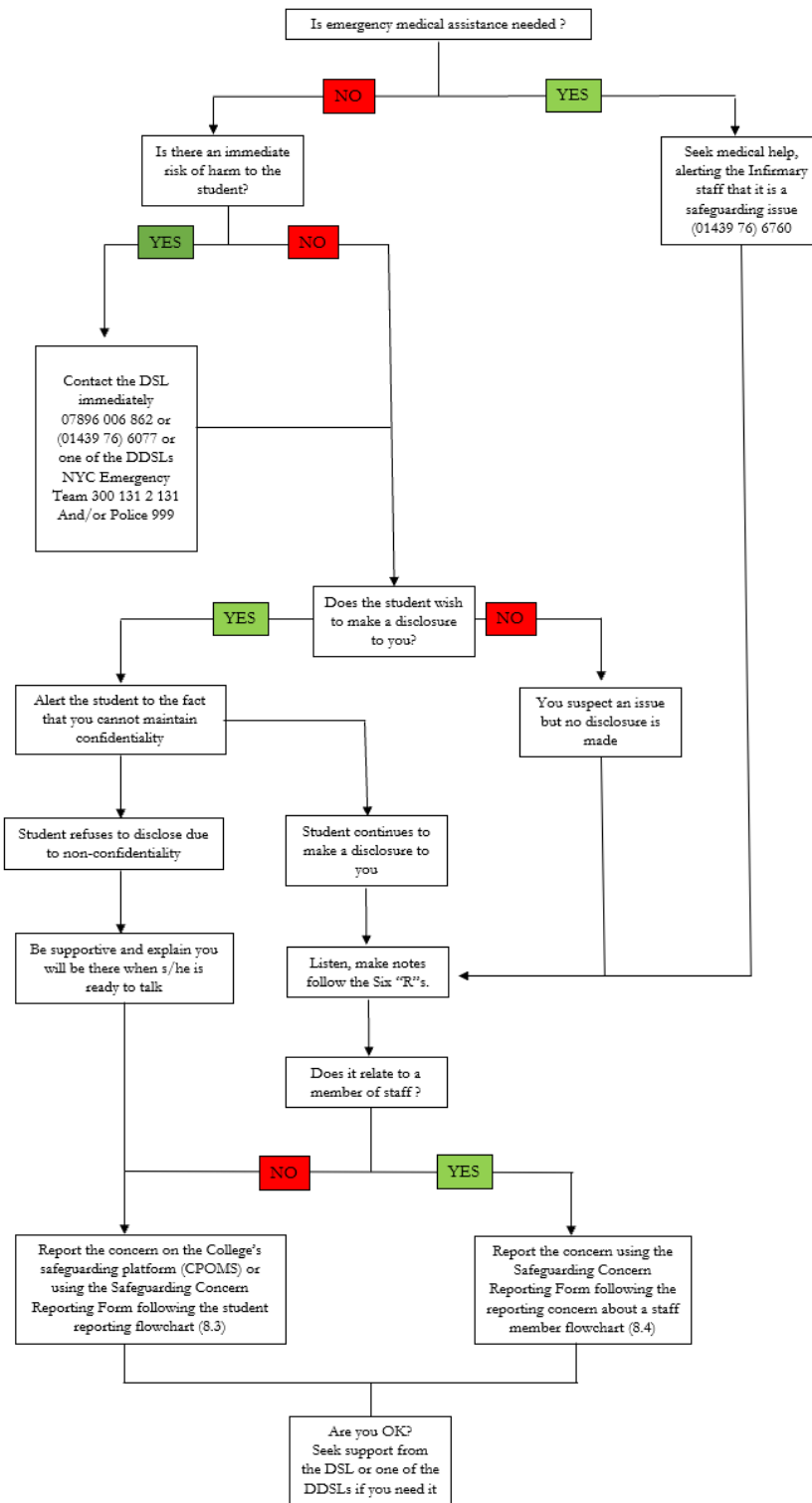
All records are kept securely away from other student files. If a student leaves the College to join another school or Sixth-Form college then a secure transfer of safeguarding records will occur as soon as possible.

## Procedures:

### 8.1 What to do if someone makes a disclosure:

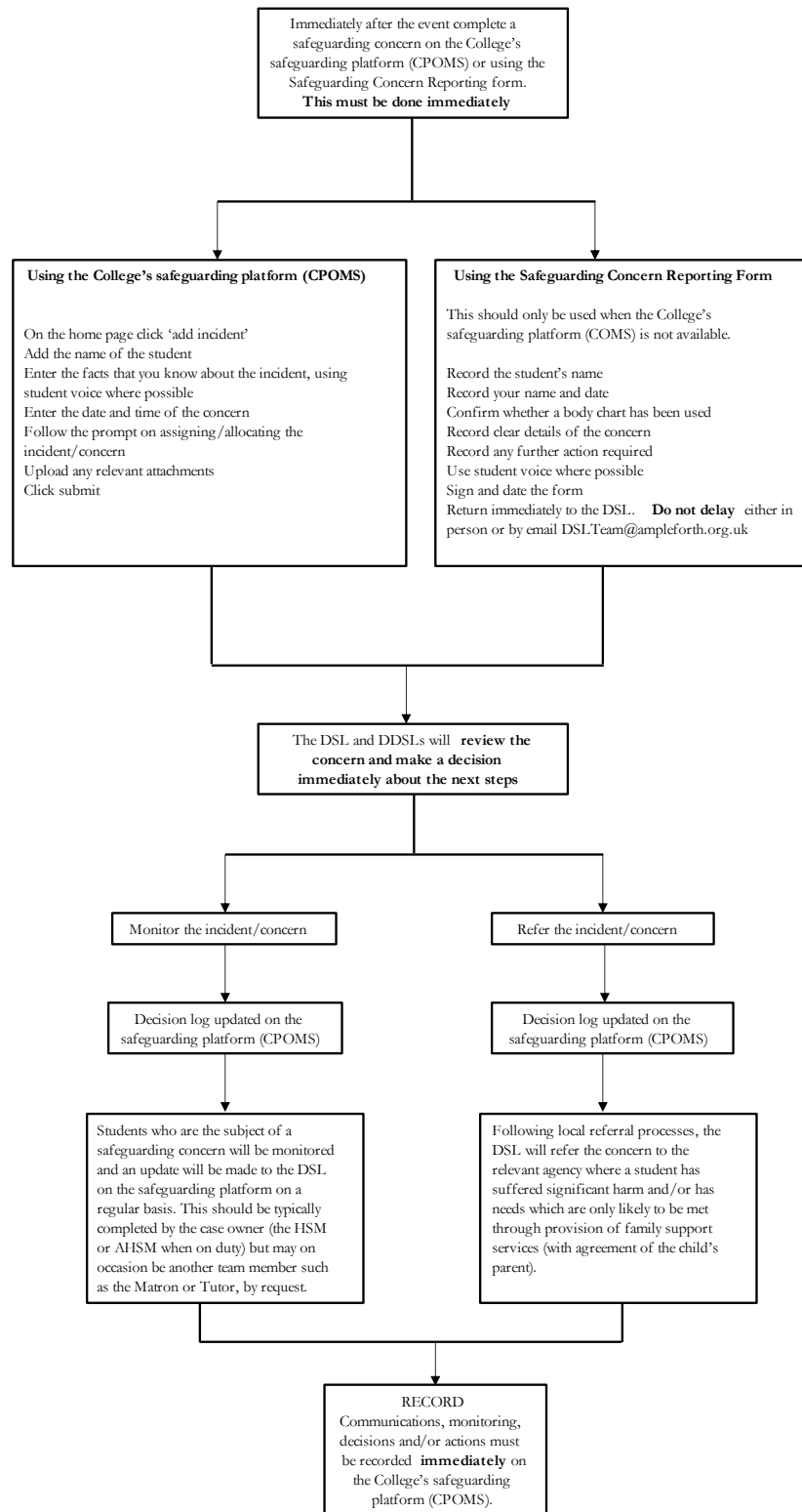


## 8.2 What to do if you suspect a student is suffering or likely to suffer harm

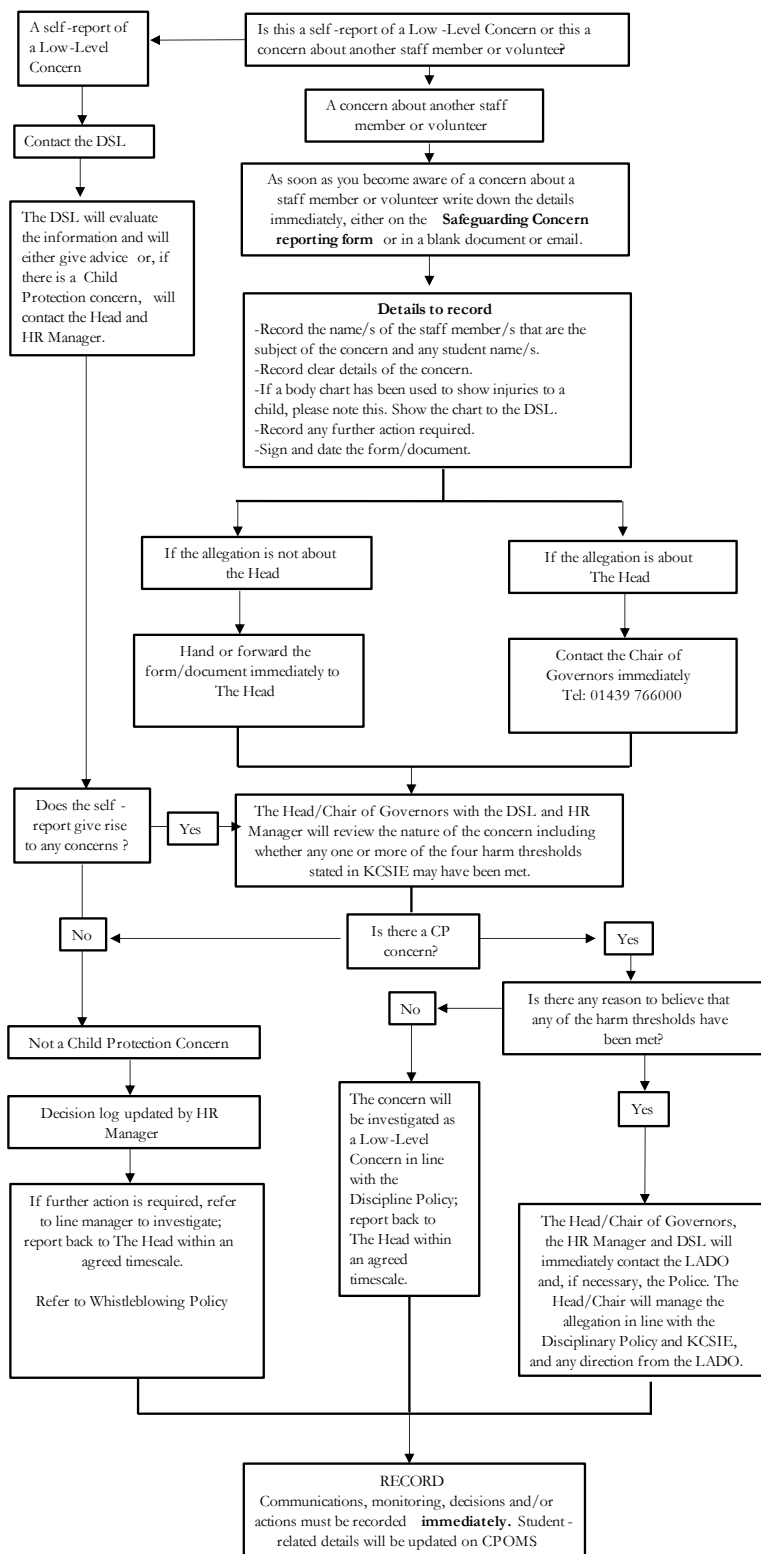




### 8.3 Reporting a concern about a student:



### 8.4 Reporting a concern about a member of staff:



## 9 TYPES OF ABUSE

Abuse involves maltreatment of a child. The definition of child abuse is wide in order to cover all forms of cruelty that children may endure in their lives. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can happen wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Harm can include ill treatment that is physical, as well as the impact of witnessing ill treatment of others (particularly the impact on children of all forms of domestic abuse).

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Abuse can take four main forms:

- physical abuse
- emotional abuse
- sexual abuse
- neglect

**Physical abuse** is 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.

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. For example, it may involve telling a child that they are worthless, unloved or 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of others. 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.

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

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of health or development. 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 carers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Full details of the types of abuse and neglect to which children may be vulnerable are stated in [KCSIE \(2023\), Annex B, p.141.](#)

## 10 CONCERNS ABOUT A STUDENT

Concerns about a student may fall into one or more of several categories, of which the most important are as follows:

### 10.1 Students for Whom an Early Help Assessment is appropriate and may be beneficial

Some students may benefit from an Early Help Assessment, and staff are expected to be able to identify such students where possible.

Staff at the College should be particularly alert to students with any one of more of the following needs:

- Disability

- Special Educational Needs
- Mental Health Needs
- Young carer
- Vulnerability to antisocial or criminal behaviour
- Missing from home or from care
- At risk of modern slavery, trafficking, sexual or criminal exploitation
- At risk of being radicalised or exploited
- Has a family member in prison
- Is in a family where there may be Adverse Childhood Experiences (ACEs) such as alcohol or substance misuse
- Is misusing alcohol or other substances
- A care leaver
- At risk of Honour Based Abuse (HBA), Female Genital Mutilation (FGM) or Forced Marriage
- Privately Fostered
- Persistently absent from education (including late attendance)

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance, if staff consider that a student may benefit from early help they must log this on the College's online safeguarding platform (CPOMS). The DSL will consider the appropriate action to take in accordance with the North Yorkshire Children's Services referral thresholds. This may include appointing an 'early help champion' who may complete an initial Early Help Assessment form.

When considering the appropriate level of intervention, the College will refer to Local threshold guidelines, including the [North Yorkshire Council Ladder of Intervention \(2019\)](#).

Further details on Early Help can be found [here](#).

**A Child in Need** refers to a student whose circumstances may require them to have extra support in order for them to live a life which does not compromise their ability to fulfil their potential, as defined by The Children Act (1989), Section 17 (10). These students will be referred to Children's Services and will benefit from additional support which will be put in place as soon as a problem is identified. The College or the North Yorkshire's Children's Services team may also refer to external agencies for further advice and support in determining how to provide the best outcomes for such students.

## 10.2 Student at Risk of Immediate Harm

The Children's Act (1989), Section 47, 1(b) defines a child at risk as being one who is suffering, or likely to suffer, significant harm. Types of harm might include (but are not limited to) sexual abuse;

domestic abuse in intimate relationships; criminal exploitation; or serious violence, including that linked to county lines or radicalisation.

If a staff member believes that a student is in immediate danger or at risk of immediate harm, they must inform the DSL or one of the DDSLs immediately or make an immediate referral to NYC Emergency Duty Team and/or the Police ([see contact details here](#)). **Anyone can make a referral.** Any such referral must be made immediately by telephone. A written referral must be completed and submitted within 24 hours of the telephone contact.

Parental consent is not needed for referrals to statutory agencies such as the police and, where there is an emergency, to Local Authority Children's Social Care. Nevertheless, we will always work closely with parents in such situations if it is appropriate to do so. **If anyone other than the DSL makes a referral, they must inform the DSL as soon as possible that a referral has been made and record this on the College's safeguarding platform (CPOMS).** They must challenge any inaction (on anyone's part) and follow this up with the DSL and Local Authority Children's Social Care as appropriate (see KCSIE Sep. 2023, p.16, paras. 52-56). All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing and logged on the College's safeguarding platform (CPOMS).

We work closely with North Yorkshire Safeguarding Children Partnership (NYSCP) and in line with its policies, procedures and practice guidance. The NYSCP website is found [here](#).

### 10.3 Student at Risk of Radicalisation

Children are vulnerable to extremist ideology and radicalisation. Protecting students from this risk is fundamental to the College's safeguarding approach.

- **Extremism** is the vocal or active opposition to British fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces;
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups;
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a student is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a student's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff must be alert to

changes in students' behaviour, which could indicate that they may be in need of help or protection. Staff must use their judgement in identifying students who might be at risk of radicalisation and act proportionately which may include the DSL or a DDSL making a Prevent referral.

The College's DSL (who is the College's Prevent Officer) and DDSLs are aware of local procedures for making a Prevent referral.

If you are concerned that a student may be exposed to radicalisation, you must log this on the College's safeguarding platform (CPOMS), after which the DSL or a DDSL will follow the safeguarding procedures outlined in this policy and may also make a referral to the [Channel programme](#).

For further advice about extremism the DfE provide a dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: they can be contacted on 020 7340 7264 or [counterextremism@education.gsi.gov.uk](mailto:counterextremism@education.gsi.gov.uk) or contact 101 (non-emergency number for the police).

#### **10.4 Student Missing from Education**

As *Working Together to Improve School Attendance* (2022) ¶ 16 states , 'children missing education can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation.'

Attendance is registered in accordance with Department for Education requirements and staff are aware of how to deal with situations where students go missing either from school or on a school trip. Details of these procedures are outlined in the [Attendance Policy](#) and [Missing Student Policy](#).

Following KCSIE (2023), para. 175, p.44, the College recognises that it must make the Local Authority aware if a student leaves the roll at a non-standard transition point.

#### **10.5 Elective Home Education**

The College must inform the Local Authority of all deletions from its Admissions Register when a student is taken off its roll, except when a student has completed the final year.

The College will work with other key professionals where a parent has expressed an intention to remove a student with a view to their education being continued at home.

### **11. CHILD EXPLOITATION**

**11.1 Child Criminal Exploitation (CCE):** is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity either in exchange for something the victim needs or wants, and/or for the financial or other advantage for the perpetrator and/or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not have to include physical contact, it

can also occur through the use of technology. The most prolific form of CCE is where children are exploited and coerced to carry drugs or other contraband from urban areas to suburban and rural areas ('county lines').

Indicators that may signal a student is at risk from or involved with CCE can include:

- increased absences,
- a change in friendships or relationships with older individuals,
- a significant decline in performance,
- signs of self-harm or a significant change in wellbeing.

Unexplained gifts or new possessions could also indicate that students have been approached by or are involved with individuals associated with criminal networks or gangs. If you are concerned about a student, you must report this on the College's safeguarding platform (CPOMS), or on the safeguarding concern reporting form. Additional advice can be found in Preventing Youth Violence and Gang Involvement (link [here](#)) and Criminal Exploitation of Children and Vulnerable Adults: County Lines (link [here](#)). NYSCP offer advice [here](#).

**11.2 Child Sexual Exploitation (CSE):** involves young people who are sexually abused or coerced into sexual activity in the context of exploitative relationships by a person/persons of any age, including another young person. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not have to include physical contact, it can also occur through the use of technology. CSE can affect any child or young person under the age of 18, including 16 and 17 year olds, who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the young person's immediate knowledge (e.g. through others copying images they have created and posted on social media). Indicators of CCE (above) can also be indicators of CSE as can students who have older partners and students who suffer from sexually transmitted infections or become pregnant.

## 12 DOMESTIC ABUSE

Following the Domestic Abuse Act (2021), The College recognises that children can be significantly harmed by domestic abuse, whether as direct victims (for example through intimate relationship abuse), or through witnessing or otherwise experiencing abusive behaviour, whether psychological, physical, sexual or emotional.

The College recognises the duty to respond to domestic abuse as a serious safeguarding concern. It participates in Operation Encompass with North Yorkshire Police, and the DSL is the 'Key Adult.'

Domestic abuse may take many forms. In line with the [Home Office Information guide: adolescent to parent violence and abuse \(APVA\)](#), Child and Adolescent to Parent Violence and Abuse will be



treated as a safeguarding concern, as it may be indicative of other co-existing harmful behaviours within the home.

### 13 CHILD-ON-CHILD ABUSE

All staff must be aware of the possibility that children may abuse other children (often referred to as child-on-child abuse). This can include (but is not limited to):

- abuse within intimate partner relationships;
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm. (This may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault. (This may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, 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
- and initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Ampleforth takes a 'whole-college' approach to child-on-child abuse, and understands that it can only be countered effectively through all staff working together, and also with students, parents and other stakeholders.

The College has a zero-tolerance approach to child-on-child abuse. Sexual violence or sexual harassment will not be passed off as 'banter', 'having a laugh,' or as 'part of growing up.'

All staff should be clear that child-on-child abuse should always be viewed as a serious safeguarding concern, and should be reported immediately via CPOMS or directly to the DSL or DDSL. Furthermore, all staff should understand that even if there are no reports of child-on-child abuse it does not mean it is not happening; it may be the case it is just not being reported.

Child-on-child abuse may take place online or other forms of technology may be used to facilitate offline abuse. Students are regularly reminded of the College's policy on bullying and on cyberbullying

and all students must sign an [Acceptable Use Agreement](#) which governs their behaviour on the College network.

Child-on-child abuse can manifest itself in many ways both between students at the College, and between students at the College and those of other schools. Some forms of child-on-child abuse are:

- Bullying amounting to child-on-child abuse: Bullying which creates safeguarding concern is any behaviour that is repeated over time and intentionally hurts another student or group of students physically or emotionally. It can occur directly or through cyber-technology (social websites, mobile phones, text messages, photographs and email) and always involves an imbalance of power. It can cause long lasting psychological effects. Bullying which amounts to child-on-child abuse is bullying of a serious or sexual nature between persons of a similar age which results in or has the potential to cause significant harm.
- Physical abuse: this includes hitting, kicking, shaking, biting, slapping, or otherwise causing physical harm to another young person.
- Harmful Sexual Behaviour: refers to any young person, under the age of 18, who demonstrates behaviour outside of their normative parameters of development (this includes but is not exclusive to abusive or violent behaviours); also abuse in intimate personal relationships (also known as teenage relationship abuse).
- Serious Youth Crime (including sexual assault): includes crimes of the most serious nature including murder, rape and GBH perpetrated on or between young people under 18.
- Sharing nudes and semi-nudes (“Sexting”): the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. Pressuring someone into sending a nude or sexually explicit picture (forced sexting) can happen in any relationship and to anyone, whatever their age, gender or sexual preference, but extra vigilance is required in a residential setting. Once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere or be stored indefinitely. Possessing or distributing indecent images of a person under 18 is a crime under the Sexual Offences Act 2003. The UK Council for Internet Safety have produced advice for education settings working with children and young people on [Sharing nudes and semi-nudes](#). Please also see [below](#) regarding the handling of any indecent images. **Remember: staff must not view or forward the image.**
- Sexual harassment: refers to ‘unwanted conduct of a sexual nature’ that can occur both online and offline. Sexual harassment is likely to violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment by other students can include:
  - Sexual comments such as telling sexual stories, making lewd comments, making sexual remarks about clothing or appearance and calling someone sexualised names.
  - Sexual “jokes” or taunting.
  - Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes or displaying pictures, photos or drawings of a sexual nature.

- Upskirting. This typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments and messages and online sexual exploitation, coercion and threats.

Sexual violence and sexual harassment can occur between children of any age and sex, and between individuals and groups. However, it is more likely that girls will be the victims, and boys the perpetrators, of these behaviours. Sexual violence and sexual harassment exist on a continuum and may overlap. These behaviours can occur online, face-to-face, or in a combination, and can be associated with factors outside the College, including intimate personal relationships. In all likelihood, a victim's educational attainment will be affected by these behaviours.

The College recognises that interventions to address inappropriate behaviour can help prevent more serious behaviour in the future. It also recognises that not acknowledging or understanding the scale of scale or harassment and abuse, or downplaying its significance, can lead to a culture where students accept these behaviours as normal, and therefore do not make reports.

### **Minimising the Risk of Child-on-Child Abuse**

The College recognises its duty to minimise the risk of Child-on-Child Abuse. This duty is met in a variety of ways including:

- The College's Christian Living Programme, which includes Personal, Relationships, Health and Sex Education; and also briefings to year groups around specific issues such as consent, HSB and online safety.
- The College's Harmful Sexual Behaviour Action Plan. The purpose of this plan is to reduce the risks of harmful sexual behaviour by student questionnaires, additional staff training, and guidance to parents.
- Communication with parents regarding the safe management of parties.
- Self-defence courses for students.

### **Reporting concerns of child-on-child abuse**

- All students are made aware of how to report any safeguarding concern, including child-on-child abuse. The photographs, names and contact details of the DDSL team are displayed across the College campus, including in Houses and common areas.

- The College recognises that students may not find it easy to disclose their experience of abuse verbally. Staff need to be aware that students may show signs or act in ways that they hope adults will notice. Rather than making a disclosure themselves, a victim's friend may make a report, or a conversation may be overheard suggesting that something is wrong. Staff need to be alert to any signs that a student has been harmed. Also, a change in a child's behaviour may be a non-verbal disclosure that they have suffered harm. These behavioural changes may manifest in a wide variety of ways and staff should be vigilant to these changes.
- Fear of backlash from other students can be a powerful factor in deterring or delaying disclosures of child-on-child abuse and the College recognises the imperative of reassuring and supporting any victim making a disclosure.

### **How allegations of child-on-child abuse will be recorded, investigated and dealt with**

- The College recognises that all allegations of child-on-child abuse are to be taken very seriously, and these will be treated as high-level safeguarding concerns. Students who have been victims of HSB or other forms of child-on-child abuse may find the experience stressful and distressing.
- All allegations of child-on-child abuse will be logged as soon as possible on the College's safeguarding platform ([see flowchart](#)), where any actions, decisions and outcomes will be updated as these occur.
- Allegations will be investigated in line with the guidance stipulated in KCSIE Sep. (2023), Part 1 and Part 5.

### **How victims, perpetrators and any other affected children will be supported**

- The College recognises that its initial response to a report from a student is incredibly important, and the importance of all victims being reassured that they are being taken seriously.
- The College recognises that its principal duty is to protect, support and reassure the victim in any allegation of child-on-child abuse.
- The College will also assess the risks and needs of the victim, the perpetrator and other students. This should also include a careful consideration of whether the victim and perpetrator/s should be separated when in classes and activities, depending on the nature of the allegation.
- The College will fulfil its duties to make referrals, as needed, to Local Authority Children's Social Care and to the Police, as stipulated in KCSIE (Sep. 2023) Part 1 (p.16) and Part 5 (p. 110).

- The College will also signpost the victim to appropriate services, such as Child and Adolescent Mental Health Services (CAMHS).
- The College will follow the guidance of external agencies, including that of any Child Sexual Violence Advisor (ChiSVA) appointed to support the victim.
- The College will also consider the educational needs of the alleged perpetrator/s and what safeguarding support they may need, recognising that they may have unmet needs of their own, and that they themselves may have experienced abuse.

### **Issues to consider when responding to allegations of child-on-child abuse**

In the case of abuse by a student, or group of students, the key issues that must be considered when determining that abuse is taking place are:

- The frequency, nature and severity of the incidents
- Whether the victim was coerced by physical force, fear, or by a student or group of students significantly older than them or having power or authority over them
- Whether the incident involved a potentially criminal act, and whether if the same incident (or injury) had occurred to a member of staff or other adult, it would have been regarded as assault or otherwise actionable. (If in doubt, report on the College's safeguarding platform.)
- The impact of the incident on the student or students involved

When a disclosure is made it is essential that the victim or victims are reassured that they are being taken seriously and that they will be supported and kept safe. All staff should act in the best interests of the child.

Where an allegation of abuse against one or more students has been made or where staff are concerned about child-on-child abuse, the child protection procedures set out in this policy and summarised in the flowcharts [here](#) must be followed; specifically, staff must report their concern immediately on the College's safeguarding platform (CPOMS) or using the Safeguarding Concern Reporting Form. The student(s) accused of abuse, and the victim of abuse, will both be treated as at risk and a referral will be made to Local Authority Children's Social Care in respect of either student if that student is suffering or is at risk of harm.

Where there has been a report of sexual violence the DSL or DDSL should make an immediate risk and needs assessment. This should consider the protection and support for the victim; the alleged perpetrator; all the other children, and any actions that are appropriate to protect them.

If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, we will ensure that parents are informed as soon as possible, and that the student is supported during the interview by an [appropriate adult](#). A wide variety of staff have received appropriate adult training. In the case of students whose parents are abroad, the student's guardian will be requested to provide support to the student.

In some cases of sexual harassment, for example, one-off incidents, the College may take the view that the students concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, where relevant utilizing the College's behaviour policy and by providing pastoral support.

In instances where there has been non-violent harmful sexual behaviour the College may decide that the students involved do not require statutory interventions, but may benefit from early help, which can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

Where a pupil has been harmed, is at risk of harm, or is in immediate danger, the College should make a referral to Local Authority Children's Social Care.

Where a report of rape, assault by penetration or sexual assault is made, the starting point is that the College must pass this on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. Any report to the police will generally be in parallel with a referral to Local Authority Children's Social Care.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the student or other person making the allegation is in need of help or may have been abused by someone else, and that this is a cry for help. In such circumstances, a referral to Local Authority Children's Social Care may be needed.

If a report is shown to be deliberately invented or malicious, the College should consider whether any disciplinary action is appropriate against the individual, following its policies.

## **14 ONLINE SAFETY**

Many of the concerns described above (for example sexual abuse, severe bullying and extremism and radicalisation) may occur online.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place online as well as face to face.

In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abuse, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

The College recognises its duty to safeguard children from potentially harmful and inappropriate online material.

Following KCISE (2023), para. 136, p.35, The College recognises that there are four principal areas of risk:

- **content:** exposure to illegal inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, misandry, self-harm, suicide, anti-Semitism and extremism
- **contact:** being subjected to harmful online interaction with other users: for example: child-to-child pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** personal behaviour that increases the likelihood of, or causes, harm; for example making, sending, and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography sharing other explicit images and online bullying
- **commerce:** risks such as online gambling, inappropriate advertising, 'phishing' and or financial scams

Following KCSIE (2023), para. 138, p.36, The College has an Online Safety Policy, and the DSL has overall responsibility for the safeguarding aspects of the College's network and WIFI, liaising with the IT Network Manager.

The College uses several methods of monitoring including:

- Physical observation of screens, for example during lessons.
- In computer rooms teachers may remotely monitor the screens of other logged in users
- The use of a Firewall and live monitoring and filtering software of all devices connected to the College's WIFI and network.

Following KCSIE (2023) paras. 141-142, p.37 and [Meeting Digital Technology Standards in Schools and Colleges \(DfE, 2023\)](#), The College ensures that individual user access to the College network is appropriately filtered and monitored, using Sophos Fastvue software that blocks access to harmful sites and content, and which generates automatic reports whenever this may have occurred or been attempted. (Sophos has been a member of the [Internet Watch Foundation](#) since 01/11/2005.)

The filtering system is operational at all times, is automatically updated, and monitors all users (including guest accounts), school owned devices and any other devices using the College's network and WIFI. In addition, the College may also add specific websites or search terms to be blocked, should the need arise.

The College's Firewall and Sophos software blocks access to, and generates reports, if there is an attempt to access websites that:

- have known sexual content, including where that content is known to be, or might be, unlawful
- promote extremism or violence
- promote or encourage suicide or harmful behaviours
- promote gambling

- promote illegal substances

Search terms entered into web browsers in the above categories will also result in the searches being blocked and reported.

This system filters all internet feeds, including any backup connections and is sensitive to texts in multiple languages. The College also has software in place to identify the use of VPNs and other proxies.

The College has defined responsibilities for the operation of monitoring and filtering.

- The Description of Responsibilities for the Safeguarding Governor includes holding the DSL to account for filtering and monitoring.
- Following KCSIE (2023), para. 123, p. 28, The DSL has overall responsibility for online safety, and is accountable to The Head and The Safeguarding Governor (representing the Governing Board) for ensuring that standards are met including documenting decisions, reviewing effectiveness and overseeing reports. The DSL also maintains a log of reports from the Firewall, and enters the incident on CPOMs.
- Following KCSIE (2023), para. 14, p. 8 and para. 124, p.32, the DSL is responsible for training staff to ensure that they are aware of the operation of monitoring and filtering.
- The IT network manager ensures the technical operation of the monitoring and filtering software, and the Firewall. The IT Manager and the DSL liaise regularly regarding monitoring and filtering. For example, the DSL receives a weekly report from the IT Manager.
- Pastoral Staff, and where appropriate those with disciplinary responsibilities, may also be involved in follow-up conversations with individual students.
- Where the report relates to the behaviour of a staff member or volunteer, The Head and HR Manager will be involved.

The Sophos system, including the Fastvue reporting mechanism, is maintained by the IT Network Manager. Alerts produced by Sophos Fastvue are sent directly to the DSL and DDSLs. The DSL (or a deputy) follows-up alerts where there is a cause for concern (i.e. where there is good reason to believe that the alert is not a 'false-positive', such as that produced by unsolicited advertising sent to the user, and where there is no concern around the appropriateness, safety or legality of the content). Where the concern relates to a student and does require further investigation, this is logged on CPOMS for follow-up by the relevant staff member. Where the alert relates to a staff member or volunteer, and where further investigation is deemed necessary, the College follows its Low Level Concerns policy.

Following KCSIE (2023) para. 142, p.27, The College has Risk Assessments in place for Online Safety and The Prevent Duty, and these include consideration of network monitoring and filtering.

The College addresses the age appropriateness of internet access through differentiated arrangements for when year groups can access technology such as mobile devices.



Staff are trained to report any concerns around online behaviour, or any Firewall-related issues, including any apparent failure of the monitoring and filtering system, or any websites where access may be reasonably unblocked for the purpose of teaching and learning or other legitimate reasons.

Students and staff are guided in the acceptable use of our network ([Acceptable Use Policy- students](#), [Acceptable Use Policy -staff](#)) and the internet in general (all advice is in line with the Department of Education guidance document, [Teaching Online Safety in Schools 2019](#)).

Students also receive training in online safety appropriate to the needs of their year group. The College communicates with parents on matters of online safety, and this includes sharing information regarding steps taken within the College to prevent access to harmful content.

The College recognises that students with a particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber dependent crime. If there are concerns in this area, the DSL should consider referring the individual to the National Crime Agency [Cyber Choices programme](#).

The College also has a [Mobile Phone Policy](#) that states under what circumstances pupils in particular year groups may use their mobile phones, including permitted times and locations.

Any evidence that a student may be at risk online or indeed being harmed online must be recorded immediately on the College's safeguarding platform (CPOMS) or the safeguarding concern reporting form so that it can be taken forward as a child protection issue.

In cases of students sexting (sharing nudes or semi-nudes) or sharing pornographic images online, staff are reminded that it is illegal to possess, store or distribute an image containing sexual imagery of a child under 18, even if the possessor is under 18 and/or the image shared is of themselves. Therefore, when taking a disclosure from a student concerning this issue, **do not view or forward the image**. Instead alert the DSL or DDSL to the image's existence through an entry on the College's safeguarding platform (CPOMS) or the safeguarding concern reporting form.

When responding to instances of youth produced sexual imagery, the College will be guided by the non-statutory publication ['Sharing Nudes and Semi-Nudes: Advice for education settings working with children and young people; Responding to incidents and safeguarding children and young people'](#) (UKCIS, Dec. 2020).

The College also recognises that online safety is a theme that is related to other areas. It is referenced throughout [The Online Safety Policy](#), [The Acceptable Use Policy \(Students\)](#) and in [The Anti-Bullying Policy](#) (section 2.2).

## **15 SAFEGUARDING SEND STUDENTS**

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges, both in person and online. Consequently, there is regular and structured collaboration between the DSL, the DDSLs and the Learning Support Department. Students with higher level SEND needs receive additional pastoral support from the Learning Support Department.

Evidence shows that children with SEND are among those more at risk of abuse. Additional barriers can exist when recognising abuse or neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with special educational needs and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers may make it difficult, for example, for the child to disclose about a concern.
- cognitive understanding – the ability to tell the difference between fact and fiction in online content.

The College recognises the need to support SEND students in expressing any concerns they may have and be particularly vigilant to any signs or indicators of abuse. Additional advice may be sought from Assistant Head: Support for Learning (SENCO) and the DSL as appropriate. In cases where abuse is reported or suspected involving a student with SEND needs, close liaison will be necessary between the SENCO and the DSL.

## **16 SAFEGUARDING AND THE NEEDS OF LGBT STUDENTS**

The College recognises that students who define themselves as LGBT, or are perceived to be by others, may face additional challenges and vulnerabilities, including the potential for harassment or exclusion by peers; and also that the risks for LGBT students may be greater if they do not have a trusted adult in whom to confide.

## **17 SAFEGUARDING AND MENTAL HEALTH**

Staff must be aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health issue. However, staff are well placed to observe students day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a student, they must log this on the College's safeguarding platform (CPOMS) or the safeguarding concern reporting form immediately. If there are indications that the student may be suffering, or at risk of suffering serious harm, staff must contact the DSL or one of the DDSLs immediately or if contact cannot be made with any of these, NYC Emergency Duty Team and /or the Police (contact numbers [here](#)). If a mental health concern is also a safeguarding concern, the DSL or one of the DDLs should be notified.

The DfE has published advice and guidance on [Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools](#). In addition to which, Public Health England has produced a range of resources to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#).

The College has access to a range of advice to help in identifying students who may be in need of additional mental health support.

## **18 STUDENTS WHO ARE, OR WHO HAVE BEEN, LOOKED AFTER CHILDREN**

Students who are looked after by a local authority, or who were previously looked after, can face additional safeguarding issues.

If staff have any concerns about this category of students, they must report them on the College's safeguarding platform (CPOMS). The DSL/DDSL will then contact the Deputy Head Academic, who is the College's designated member of staff for looked after children.

He has overall responsibility for their welfare and progress. In addition to this, he will have up to date assessment information from the relevant local authority for students, their most recent student welfare risk assessment and contact arrangements for parents and carers.

Further information on the responsibilities of the Designated Teacher is available via: [The Designated Teacher for looked after and previously looked-after children: Statutory guidance on their roles and responsibilities \(DfE, 2018\)](#).

Support and guidance are available to children who have been care leavers from the [North Yorkshire Virtual School](#).

## **19 STUDENTS REPORTING HONOUR BASED ABUSE (HBA)**

Honour based abuse is a general term which includes incidents or crimes which have been committed to protect or defend the 'honour' of the family and/or the community, including female genital mutilation (FGM), forced marriage (and any behaviour intended to coerce an individual aged 18 to

marry), and practices such as breast ironing. If any evidence of such practices within a family comes to light staff must report this on via CPOMS or the safeguarding concern reporting form immediately.

If an adult learns that an act of FGM appears to have been carried out on a girl aged under 18, they have a statutory duty to report it to the police. They must also follow the usual safeguarding procedures set out in this policy and report the matter on the College's safeguarding platform (CPOMS) or the safeguarding concern reporting form. The DSL will involve Children's Services where appropriate. There are a range of potential indications that a girl may be at risk or has already suffered from FGM. Further information is available within KCSIE (Sep. 2023) (pp. 14-15 & p.154).

## **20 ALLEGATIONS ABOUT MEMBERS OF STAFF**

All staff understand the definition of appropriate behaviour and professional boundaries. The College has a process in place for internal reporting, and external reporting to the LADO ([see contact details here](#)), of any concerns about a member of staff (or any adult working with children).

Any concerns or allegations about the conduct of a member of staff that may meet the harms threshold detailed below (following KCISE, Sep. 2023, paragraph 355, p.87, and paragraph 20 p.140), will first be referred to the Head (or the Deputy Head in their absence). [Flowchart for reporting can be found here](#).

In all cases regarding concerns about a member of staff (or adult working with children) the College will work within the framework provided by NYSCP's document [Managing Allegations against Those Who Work or Volunteer With Children Procedure](#) and the College's [Disciplinary Policy](#).

Where the College has identified that a child has been harmed, the DSL (or DDSL) will assess whether the child is at risk and will make a report to Local Authority Children's Social Care, in addition to the actions taken by the case manager regarding the staff member.

### **20.1 Concerns that may meet the harm threshold**

KCSIE (Sep. 2023), paragraph 355, p. 87, guidance must be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers has:

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

As noted above, where staff have concerns about another staff member posing a risk of harm to children, this should be reported to the Head (or Deputy Head in their absence). If the concern is about supply staff or a contractor, the employer should also be notified, in addition to a report being made to the Head.

The process for responding to allegations/concerns that do not meet the harms threshold is detailed immediately below.

## **20.2 Low-level concerns**

A Low-level concern is defined as one that does not meet the threshold set out above but where there are nonetheless concerns that an adult working for the College may have acted in a way that is inconsistent with the code of conduct, including inappropriate conduct outside of work.

KCSIE (2023), p.101, para. 426 states that examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door: or,
- humiliating pupils.

### **Reporting low-level concerns**

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the Head (or to the Deputy Head in their absence). (KCSIE Sep. 2023, p. 102, para. 433). If the concern is about the Head, a report should be made to the Chair of Governors.

A staff member may share a low-level concern confidentially using the procedure noted below.

[Flowchart for reporting can be found here](#)

Where the low-level concern relates to a person employed by a supply agency or contractor to work in the college, the employer should also be notified about the concern, so that any potential inappropriate patterns of behaviour can be identified.

### **Responding to reports of low-level concerns**

If the College has been alerted to a low-level concern and is in doubt as to whether it meets the harm threshold, it should consult with the LADO.

The College should ensure that staff feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. (See below: **Self-reporting of low-level concerns**.)

### **Recording low-level concerns**

All low-level concerns should be recorded in writing. The record should include the details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous that should be respected as reasonably possible.

### **Reviewing the records of low-level concerns**

Records are reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Should a pattern of such behaviour be identified, the College would decide on a course of action, either through its disciplinary procedures, or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. The log of Low-Level Concerns is checked regularly by the Safeguarding governor throughout the year.

### **Self-reporting of low-level concerns**

The College recognises that having a system for staff to self-report is part of a healthy safeguarding culture. Self-reporting provides an opportunity to staff to share concerns where they may be anxious around a situation, for example where their actions or words may have been vulnerable to misinterpretation, where they may have had to take extraordinary action, or where a circumstance has arisen beyond their control. Self-reporting also permits lessons to be learned and the refining of best practice.

The following examples are circumstances where staff may wish to consider making a self-report of a low-level concern, but this list is not exclusive:

- Where the behaviour of a student has caused a staff member to feel uncomfortable.
- Where the appropriate, necessary and proportionate use of restraint was required, especially in a situation where there were no other witnesses present.
- Where a staff member had to administer emergency first aid in a secluded or remote location, and where there may have been no other witnesses present.
- Where an emergency required the unscheduled driving of a lone student, for example to access medical care.

- Where a staff member needed to perform a safety check on a student in an enclosed space.
- Where a use of language or gesture by a staff member may have been misinterpreted by students.
- Where a student has attempted to contact a staff member using a private channel, such as via social media.

If a staff member wishes to self-report they should contact the DSL, or in their absence one of the deputy DSLs.

## 21 WHISTLEBLOWING PROCEDURE

All staff should always feel able to raise concerns about poor or unsafe practices and potential failures in the College's safeguarding regime. If staff have concerns that a child protection matter is not being dealt with in accordance with our stated procedures, they must raise it under the school's Whistleblowing Policy, which can be found [here](#).

Alternatively, if it is felt that genuine concerns are not being addressed, staff may contact the NSPCC whistleblowing advice line (0800 028 0285 or [help@nspcc.org.uk](mailto:help@nspcc.org.uk)) or contact the Local Authority Designated Officer (LADO) when appropriate to do so in accordance with KCSIE (Sep. 2023).

There will be no retribution or disciplinary action taken against staff for making such a report if it is done in good faith. Malicious allegations, however, may be considered as a disciplinary offence.

## 22 MANAGEMENT OF SAFEGUARDING

The College follows rigorous procedures to ensure that the welfare of students is paramount. These include the following:

### 22.1 The RASHEN process (For further details, see [Appendix C](#)).

During term-time the DSL (or their deputy), leads a weekly RASHEN meeting, for each House, with the HSMs, and the SENCO, or their deputy, to discuss students who are the subject of safeguarding or other significant pastoral concerns; to review actions already taken; and to identify next steps. If the SENCO or their deputy cannot be present at the RASHEN meeting, they will contribute a written comment to assist in the review of each student.

In addition to the RASHEN meetings, the DSL and the SENCO meet regularly to consider students who are the subject of safeguarding concerns, and whose learning support needs may have a bearing on their safeguarding. The evaluations made and decisions taken in RASHEN meetings are added to the student's profile on the College's safeguarding platform (CPOMS).

## **22.2 The Students with Complex Needs Meeting. ([For Further details, see Appendix D.](#))**

Where the needs of a student may be better supported by an internal multi-agency approach, they will be discussed in a weekly Students with Complex Needs Meeting. Outcomes of this meeting may include recommendations for an Early Help Assessment or a Team Around the Family Meeting.

## **22.3 Monitoring**

The DSL meets at least weekly with the Head to discuss safeguarding concerns.

The DSL meets regularly with the Nominated Safeguarding Governor to discuss anonymised cases of students with ongoing concerns, scrutinises a range of other safeguarding practices by the College and reports back to the Safeguarding Committee and Board. (The arrangements for Governor oversight are described below in **Section 30**).

## **23 SAFER RECRUITMENT**

The College takes seriously the responsibility to recruit staff, Governors, contractors and volunteers who are suitable to work with children. The first step to safeguarding all students is to appoint staff who share our commitment to the welfare of the students. The Recruitment Policy can be found [here](#).

The College undertakes a rigorous recruitment and screening process, which is in line with KCSIE (Sep. 2023), the Independent Schools' Inspectorate, and [National Minimum Boarding Standards regulations \(2022\)](#). The Human Resources team and other key staff who manage this process are trained in safer recruitment procedures.

The College will take all reasonable measures to:

- ensure that we practise safer recruitment in checking the suitability of staff and volunteers (including staff employed by another organisation) to work with children and young people in accordance with the guidance given in KCSIE (Sep. 2023) and the Education (Independent School Standards) (England) Regulations 2014. Procedures are outlined in the College's Safer Recruitment Policy and Procedure.
- ensure that we carry out all necessary checks on the suitability of people who serve as Governors in accordance with the above regulations and guidance given in KCSIE (Sep. 2023).
- carry out online searches as part of due diligence when shortlisting candidates. The College will make candidates aware that such searches are carried out.
- ensure that where staff from another organisation are working with our students either on College property or on another site, we have received confirmation from that organisation



that appropriate child protection checks and procedures apply to those staff and that such checks do not raise any issues of concern in relation to the suitability of those staff members to work with children.

- ensure that where the College ceases to use the services of any person (whether employed, contracted or a volunteer) because that person was considered unsuitable to work with children, a detailed report is made to the Disclosure and Barring Service (DBS) as soon as possible after the person has ceased to provide services to the College and in any event within one month of the person leaving the College. This includes dismissal, non-renewal of a fixed-term contract, no longer using a supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above. Where a dismissal does not reach the DBS referral threshold, consideration will be given to making a referral to the Teaching Regulation Agency (TRA).

The Human Resources (HR) Manager is responsible for ensuring that all members of staff are recruited following the procedures defined in Part 3 of KCSIE (Sep. 2023). This is done in accordance with the school's Recruitment Policy. The HR Manager will ensure that the recruitment checks of all employees are retained on the College's Single Central Register.

Additionally, the HR Manager will ensure that individuals who are engaged in regulated activity with students, including volunteers and those employed by third parties, undergo the appropriate recruitment checks and are included on the **Single Central Register** where required. This is in line with the [Recruitment, Selection and Disclosures Policy & Procedure](#)

Whenever a reference is requested for current or former staff, they will be completed in line with the [Issue of Reference Policy](#). This explains who can provide a work reference and what checks need to be carried out before it is signed and sent off. This is to ensure that any safeguarding concerns which the College may have about current or former staff are properly shared.

## 24 VISITORS

Visitors to the College are managed in line with the [College Visitor Policy](#) which sets out arrangements for individuals coming on site.

Staff and students in the College are made aware that only staff members wearing a black lanyard may work with students on an unsupervised basis. Students are made aware of what to do if they encounter an unescorted individual adult who is not wearing the appropriate lanyard.

## 25 DUTIES UNDER THE HUMAN RIGHTS ACT (1998) and THE EQUALITY ACT (2010)

Following KCSIE (Sep. 2023), the College recognises the applicability of the Human Rights Act (1998) to the operation of safeguarding, and that being subject to harassment (including sexual harassment), violence, or abuse may breach these rights.

The College also recognises that, under The Equality Act (2010), it must not discriminate against students because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation, and also consider how to support students with these protected characteristics.

## 26 STAFF CODE OF CONDUCT

The Staff Code of Conduct can be found ([here](#)) or requested as a hard copy document from line managers. The Staff Code of Conduct provides clear guidance concerning staff actions and conduct in order to ensure students and staff are not at risk of harm, or of allegation of harm to a student. It sets out the behaviour expected from all members of staff, and offers specific guidance for staff in boarding houses, delivering tutorials or in one-to-one situations where they may be vulnerable to malicious accusations or for misunderstandings to occur. It also explains the major policies that staff must comply with and where to find them.

## 27 RESPONSIBILITIES OF STAFF MEMBERS

Everyone in the College must be involved in promoting safeguarding. Staff must maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a student, staff must always act in the best interests of the student within the statutory guidelines for reporting concerns and summarised in the flowcharts [here](#). **We all have responsibility for ensuring the welfare of our students**, and staff must always report any concerns that they may have about a student on College's safeguarding platform (CPOMS) or using the Safeguarding Concern Reporting Form.

It is important that staff show professional curiosity at all times on matters relating to safeguarding. Even if a concern is at a low level, all staff have a duty to report it to the DSL, or a deputy, if it is about a child, or to the Head if it is about an adult.

Staff should also know that children may not feel ready to, or know how to, tell someone that they are being abused, exploited or neglected, or they may not recognize their experience as being harmful.

## 28 TEACHING SAFEGUARDING

The College recognises the importance of students being taught how to keep themselves and others safe, including online. The College satisfies this requirement in a variety of ways, including:

- The Christian Living (RSHE) Programme
- Year-group talks
- Visiting speakers
- House-based provision (to enable discussion in single-sex groups where this is appropriate)
- Targeted interventions with groups or individuals

The College recognises the importance of preparing students for a modern Britain with zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.

The College's approach to RSHE is grounded in its Benedictine ethos, including supporting each student in striving to be the very best person that they can be, through a respect for place (including respect for the values of living together) and healthy relationships.

The College's Christian Living programme is age-appropriate and inclusive. It includes themes such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality, including for LGBT students
- How to understand healthy and unhealthy relationships
- The law in relation to consent and Harmful Sexual Behaviour, and how any form of harassment or violence is always unacceptable.

The College also recognises the additional challenges that students with SEND face in understanding safeguarding, and this is addressed through tailored support to match the needs of individuals who may otherwise struggle to access the universal provision.

## 29 RESPONSIBILITIES OF THE DSL

The DSL is a member of the College's Senior Leadership Team and is the designated senior member of staff who takes specific responsibility for child protection matters in the school. The DSL has received child protection training which is regularly updated every two years; this training is to the highest level so that the DSL is able to train other members of staff. The DSL exercises their responsibilities in conjunction with Deputy DSLs. The DSL and DDSLs have a job description and must fulfil their duties in line with Annex C of KCSIE (Sep. 2023).

The responsibilities of the DSL are listed below:

## Management of referrals

The DSL (and Deputy DSLs, if appropriate) will:

- Refer cases of suspected abuse to the Local Authority Children's Social Care as required.
- Support staff who make referrals to the Local Authority Children's Social Care.
- Refer radicalisation and extremism concerns to the Channel panel through the universal referral form where there is a radicalisation concern, as required.
- Support staff who make referrals to the Channel panel.
- (Working with the HR Manager) refer cases to the Disclosure and Barring Service, as required. Where an adult is dismissed, or has left due to risk or harm to a child. .
- Refer cases where a crime may have been committed to the Police as required, (the guidance [NPCC- When to call the police](#) informs DSL understanding of when to consider calling the police and what to expect when they do.)
- If the DSL (or colleague who made the referral) considers after a referral that the child's situation does not appear to be improving, they should press for re-consideration to ensure concerns have been addressed and, most importantly, that the child's situation improves.
- Report cases of prejudice, hate based incidents or hate crimes to the Local Authority through the [online reporting system](#).
- Access a range of advice to help them identify children in need of additional mental health support.
- Maintain a written record of all concerns, discussions and decisions made, including: a clear and comprehensive summary of each concern; details of how the concern was followed up and resolved; a note of any action taken, decisions reached and the outcome, to evidence reasons for referrals (or in some cases reasons why no referral was made).

## Working with others

The DSL (and Deputy DSLs, if appropriate) will:

- Act as a point of contact with the three safeguarding partners of the NYSCP (Police, Local Authority Social Care and Integrated Care Systems).

- As required, liaise with the HR Manager, or the ‘case manager’ if different, and the LADO for child protection concerns in cases which concern a staff member.
- Liaise with the Head to inform him of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with staff, especially teachers, House teams, College nurses, the IT Manager, the pastoral team, and the SENCO on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that students’ needs are considered holistically
- Liaise with the broader pastoral team, including the College nurses and counsellors, when concerns are linked to mental health;
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of students including where families may be facing challenging circumstances;
- Work with the Head and the leadership team, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school or college. This includes: ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children’s educational outcomes.
- Work with, and report to, the Safeguarding Lead Governor, The Safeguarding Committee and The Board of Governors.
- Ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort.
- Support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children’s educational outcomes.
- Liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies
- Act as a source of support, advice and expertise for staff.
- Use the NYSCP Professional Resolution Practice Guidance, as required.

## Undertaking training

The DSL (and Deputy DSLs, if appropriate) will:

- Complete statutory Safeguarding and Prevent training to provide them with the knowledge and skills required to carry out the role. This training should provide them with a good understanding of their own role and the process, procedures and responsibilities of other agencies, particularly children's social care and should be updated at least every year.
- Complete Prevent awareness training and Action Counter Terrorism (ACT) Training.
- Refresh their knowledge and skills by informing themselves from sources including official reports, and by bulletins such as those of the NYSCP and NSPCC at regular intervals, in order to:
  - Have current knowledge in areas such as the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
  - Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
  - Ensure that each member of staff has access to and understands the College's child protection policy and procedures, especially new and part time staff.
  - Ensure that the DSL understands training needs and delivers annual and on-going Safeguarding training for staff.
  - Make the DSL alert to the specific needs of children in need, those with special educational needs and young carers.
  - Help the DSL to understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).
  - Enable the DSL to keep detailed, accurate, secure written records of concerns and referrals.
  - Enable the DSL to understand and support the College with regards to the requirements of the Prevent duty, including online safety, and provide advice and support to staff on protecting children from the risk of radicalisation.
  - Support the DSL to access resources and attend any relevant or refresher training courses.
  - Support the DSL to encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them.

- Support the DSL in understanding the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at the College;
- Enable the DSL to recognise the additional risks that children with SEN and disabilities (SEND) face online, for example from online bullying, grooming and radicalisation.
- Enable the DSL to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college.

### **Raising Awareness**

The DSL (and Deputy DSLs, if appropriate) will:

- Ensure the College's child protection policies are known, understood and used appropriately.
- Ensure that the College Child Protection and Safeguarding Policy and Procedures document is reviewed annually (as a minimum), the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors and staff regarding this.
- Ensure that this document is available publicly, and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the College in this. (The College has developed a child-friendly version of the Safeguarding Policy so that it is fully accessible to all students in the College.)
- Link with the safeguarding partners to make sure staff are aware of training opportunities and the latest local policies on safeguarding arrangements.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and College leadership staff.
- Ensure that staff: know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort. This role entails also supporting teaching staff to identify the challenges that children in this group might face and putting in place the additional academic support and adjustments that they could make to best support these children.

### **Transferring the Child protection file**

- Where students leave prior to the end of year 13 (including for in-year transfers), the College will ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit,

and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as DSLs and SENCOs or the named person with oversight for SEND in colleges, are aware as required. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

- In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.
- The DSL ensures that child protection records are retained for an appropriate length of time and the College has regard to any other requirement requiring specific retention periods. Ensure that, if a child goes missing or leaves to be educated at home, the child protection file is stored securely in line with College's data storage arrangements.
- The DSL ensures that the North Yorkshire Children & Families Service is informed when the child leaves the College. [NYC Elective Home Education Policy and Procedures](#) can be accessed for further guidance.

### **Being available**

- During term time the DSL or a deputy will be available every day of the week for staff in the College to discuss any safeguarding concerns. In most instances the DSL (or a deputy) will be available in person, but if not they will be available via phone or Teams.
- The College ensures adequate and appropriate DDSL cover arrangements for any out of hours/out of term activities
- The College ensures that DDSLs receive training appropriate to the role of a DSL.
- Whilst the activities of the DSL can be delegated to DDSLs, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the DSL. This responsibility should not be delegated.

### **Providing support to staff**

Training should support the DSL and DDSLs in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters.



This is to ensure that staff are supported during the referrals processes and also to promote an understanding of how safeguarding, welfare and educational outcomes are linked, including how these inform the provision of academic and pastoral support.

### **Understanding the views of children**

Therefore, the DSL should be supported in developing knowledge and skills to:

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

## **30 DATA PROTECTION AND GENERAL DATA PROTECTION REGULATION (GDPR)**

The Data Protection Act (2018) and GDPR does not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not prevent the obligation to safeguard and promote the welfare and protect the safety of children, as stated in *Working Together to Safeguard Children* (2018), p.18. Further information can be found in the [Information Sharing Policy](#).

## **31 SAFEGUARDING ARRANGEMENTS WHEN THE COLLEGE'S PREMISES ARE LEASED BY EXTERNAL BODIES TO PROVIDE SERVICES TO CHILDREN WHO ARE NOT ENROLLED AT THE COLLEGE**

When students enrolled at the College are on the College site during term-time, or out of term-time but when involved in a College activity, they are always under the care of the College and its staff, apart from on specific occasions when the duty of care has been transferred to parents or guardians.

Following KCSIE (2023), paras. 166-167, p.43, and *Keeping children safe ... non-statutory guidance for providers running out-of-school settings* (DfE, 2022), when the College permits an external body to lease the use of its facilities to provide services to children who are not on the College roll, the College will require of that body assurances regarding the safeguarding of those children as part of any contractual arrangements.

Following Keeping Children Safe in Out of School Settings (2022) part 2, an external body leasing the premises is required to have safeguarding arrangements in place, including appropriate training of staff

to follow reporting procedures, and a named adult with specific responsibility for the safeguarding of all children under its care.

External bodies leasing the College premises are given information detailing their duties to follow NYSCP safeguarding arrangements where there are concerns about a child and, following KCSIE (2023), para. 377, p.91, and Keeping Children Safe in Out of School Settings (2022) part 2, the duty to report concerns regarding an adult to the LADO.

### **32 GOVERNOR ARRANGEMENTS FOR SAFEGUARDING**

Governors take seriously their responsibility to uphold the aims of the charity and their duty to promote an environment in which children feel secure and safe from harm. The Governors ensure there is an effective Safeguarding Policy in place, which has due regard to KCSIE (Sep. 2023), and that the policy is implemented in practice. They receive regular safeguarding training and have confirmed that they have read and understand KCSIE (Sep. 2023).

The Nominated Safeguarding Governor has the required knowledge, skills and expertise to be the primary point of governance oversight of the College's safeguarding arrangements. The Nominated Safeguarding Governor meets throughout the year with the Head and DSL to be appraised of all ongoing safeguarding matters and to ensure that the College's guidance and policies, and their application, are consistent with regulatory requirements.

The Safeguarding Governor chairs The Safeguarding Committee and acts with delegated authority from the Governors to ensure that College safeguarding practices and procedures (including those relating to Online Safety), and their application, are effective in keeping students safe. The Committee meets at least four times per year, but may also meet for *ad hoc* purposes if required by The Head or Board of Governors. The Committee meetings have an agenda with standing items, and detailed minutes are taken and circulated. Additionally the Safeguarding Governor and DSL also meet bilaterally as the need arises. The Safeguarding Committee also has oversight of the College's compliance with the regulatory requirements in respect of all matters to do with Safeguarding set out in the Independent Schools Standards Regulations.

The Chair of Governors also ensures that the DSL provides reports to the Board as required, and that a comprehensive report is provided on an annual basis. The Governors review The Safeguarding and Child Protection Policy, and other statutory policies, on an annual basis. This includes a review of the effectiveness with which the duties contained in those policies and procedures have been discharged. In addition to this, the Senior Leadership Team regularly review whether policy and practice in safeguarding are effective and compliant with current legislation. Detailed minutes of these meetings are taken. The Safeguarding Committee also reviews changes in legislation pertaining to its remit and brought to its attention by the DSL and identifies staff training needs with the DSL which result from those changes.

**Appendix A: Safeguarding Concern Reporting Form**

Student Name					
Date		Time		Day	
Staff Name				Signature	

Form number					
Body Chart Attached	Yes		No		
Concern (Provide as much detail as possible and include the student voice where possible)					
Signed				Date	

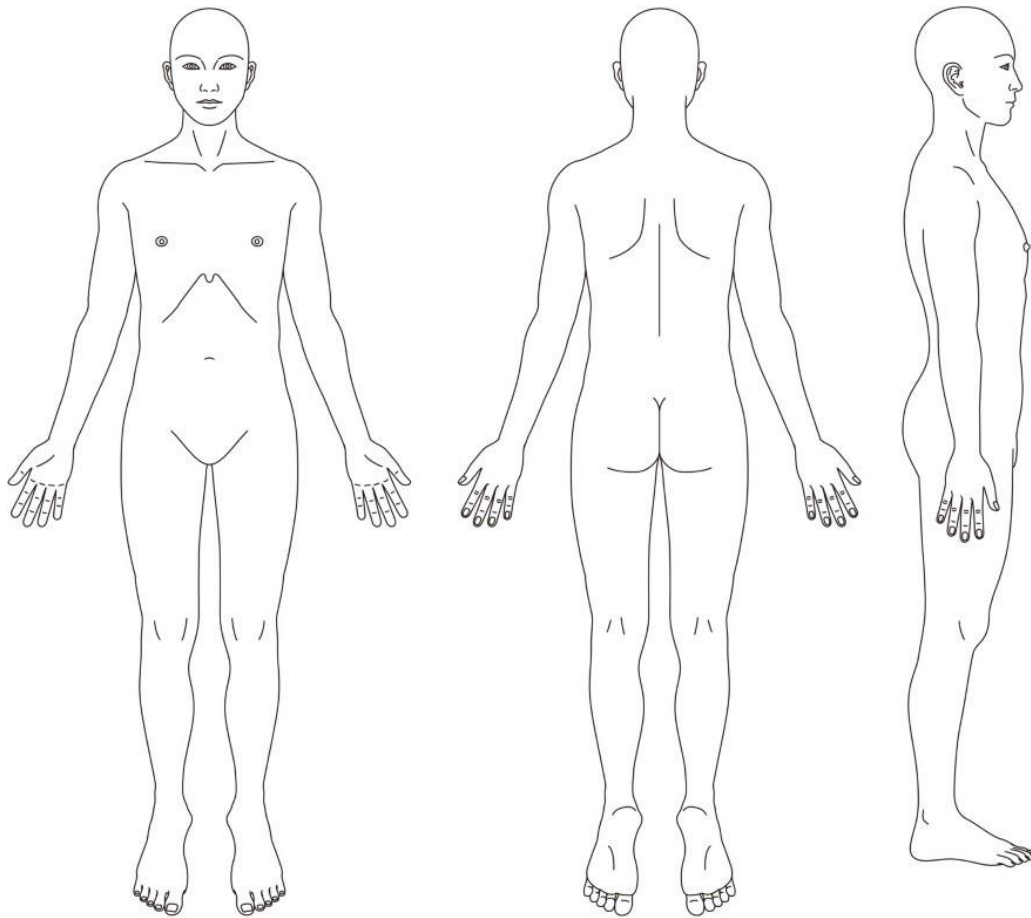
Further action required	Date of action	Action taken by	Signature

Give to DSL in person (if concern is about a student).			
<b>Give to the Head in person (if the concern is about a member of staff).</b>			
Date given to (D)DSL/Head		Time given to (D)DSL/Head	
Name of (D)DSL/Head		(D)DSL/Head Signature	
If not possible in person please email <a href="mailto:DSLTeam@ampleforth.org.uk">DSLTeam@ampleforth.org.uk</a> / <a href="mailto:head@ampleforth.org.uk">head@ampleforth.org.uk</a> immediately			

**DO NOT DELAY**

**Body chart for a safeguarding concern**

Student's Name	
Observations made by	
Signed	
Date	



## Appendix B: Signs of Abuse

Possible signs of abuse include the following (but are not limited to these and these signs do not necessarily mean that abuse is occurring):

- the student says that s/he has been abused or asks a question which gives rise to that inference
- there is no reasonable or consistent explanation for a student's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries
- the student's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the student's behaviour. For example s/he may become aggressive, challenging, disruptive or withdrawn
- the student does not want to change clothes in front of others or participate in physical activities
- the student is having problems at school, for example, a sudden lack of concentration and learning or s/he appears to be tired and hungry
- the student talks about being left home alone, with carers that appear to be inappropriate or with strangers
- the student is regularly missing from school or education
- the student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
- the student's development is delayed in terms of emotional progress
- the student suddenly loses or gains weight
- the student drinks alcohol regularly from an early age
- the student is concerned for younger siblings without explaining why
- the student talks about running away
- the student shies away from being touched or flinches at sudden movements
- the student demonstrates undue anxiety, over-reacts to problems and demonstrates an excessive fear of making mistakes
- the student appears neglected, e.g. dirty, hungry or inadequately clothed
- the student is reluctant to go home, or has been openly rejected by his parents or carers.

Signs of grooming: The signs of grooming are not always obvious. Groomers will go to great lengths not to be identified. Some actions associated with those grooming children in schools may include:

- meeting students secretly, or without seeking authorisation from House Masters or Mistresses
- collusive behaviours designed to cultivate dependency, such as:
  - unprofessional conversations about other members of staff
  - breaking School Rules over providing students with alcohol and

- 'friending' students on social media platforms, contrary to school policy. Students who are being groomed at school or elsewhere may
  - be very secretive, including about what they are doing online
  - have unexplained absences
  - have older friends or girlfriends
  - go to unusual places to meet friends
  - have new belongings such as clothes or mobile phones that they can't or won't explain
  - have access to drugs and alcohol

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age may be observed.

Staff may find it useful to refer to the Department for Education's guidance [What to do if you're worried a child is being abused \(March 2015\)](#).

## Appendix C: RASHEN

### RASHEN

Review the student, **A**ttendance, **S**chool issues, **H**ome/**H**ouse environment, **E**mootional wellbeing,  
**N**ext steps

#### Purpose and frequency of RASHEN

Every week during term-time the safeguarding team will conduct meetings in which students who have been identified as experiencing a pastoral or safeguarding concern, or who may not be flourishing, are discussed on a House basis. The students discussed may be identified by the House Team, the Safeguarding Team, or the Learning Support Department. The RASHEN meeting will include at least the DSL or one of the DDSs, the Housemaster/Housemistress, and where relevant to the student, the SENCO or one of their colleagues.

RASHEN for individual students may occur at two levels: (i) where action is already being taken, there will be a brief update, and the logging of any action points; (ii) where the concern is at a higher level, or where there are more complex needs, there will be a more formal review using the RASHEN headings.

A more formal review will consider the incident/concern, and of the outcomes of any actions already undertaken; and the identification of any further steps that are required.

RASHEN meetings may also decide whether a specific concern or incident that has been raised on CPOMS should be closed, or remain open for further monitoring, and whether the student should be automatically discussed the following week. Consideration will also be given to the relationship between the individual's safeguarding and Learning Support or medical needs, and also whether they have been affected by Harmful Sexual Behaviour (HSB) or other concerns. There may be a decision to create, or update, a Student Welfare Risk Assessment (SWRA) for the student.

At the end of the RASHEN meeting the notes will be saved to the relevant student profiles on CPOMS. Where a student is identified as having complex needs, they may also be discussed in the Students with Complex Needs meeting.

#### An example of the use of RASHEN headings

**R**- A student discloses anxiety and low mood

**A** – student attendance is good and remains at 98%

**S** – student appears withdrawn at school and is choosing to be alone at lunch and break

**H** – student is not engaging with boarding house activities and has become isolated

**E** – student is emotionally unsettled and is struggling to communicate feelings

**N** – discuss with the student whether they would feel supported by a counselling referral

**Appendix D: Students With Complex Needs Meeting**

On a weekly basis the Senior Deputy Head chairs an inter-agency meeting in which students who are deemed to have complex needs are discussed.

Participation in this meeting includes: The Head, The Senior Deputy Head, The Deputy Head Academic, The Deputy Head Pastoral, The DSL and the SENCO.

Actions arising from this meeting are as required by The Senior Deputy Head, and may include Team Around the Family Meetings or an Early Help Assessment.



## **Appendix E: Other policies relevant to Safeguarding.**

The following policies are also relevant to Safeguarding at Ampleforth College

Anti-bullying policy

Attendance Policy

Behaviour Policy

CCTV Policy

Drugs and Substances Policy

Eating Disorders Policy

Educational Visits Policy

Expulsion, Removal and Review Policy

Investigations Policy

Missing Student Policy

Mobile Phone Policy

Online Safety Policy

Physical Contact and Physical Intervention Policy

Prevent Policy

Rewards and Sanctions Policy

Staff Codes of Conduct and Behaviour Policy

Statement of Boarding

Students' Complaints and Concerns Policy

Visitor Policy