Ampleforth College

Person(s) responsible for Policy	**Head** **Designated Safeguarding Lead (DSL)** **Deputy Head Pastoral**
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Next Review Period	**September 2022**

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 NYCC 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, 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 County Council (NYCC) 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) (2021), 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 (Sep. 2021) 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. 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 tearoom, visitors centre and 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 feel safe, secure and listened to
- Staff/volunteers are confident in and understand how to report concerns
- Staff understand that in 'exceptional circumstances' they must report concerns directly to NYCC 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 are developed throughout the curriculum. The curriculum also offers guidance on identifying toxic relationships, coercion, abuse and harassment and peer-on-peer/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:

- North Yorkshire Safeguarding Children Partnership (NYSCP) Safeguarding Procedures and Practice Guidance
- Keeping Children Safe in Education (DfE Sep. 2021)
- Children Acts (1989) and (2004)
- Working Together to Safeguard Children (HMG, 2018)
- Education Act (2002)
- Counter-Terrorism and Security Act (HMG, 2015)
- Serious Crime Act 2015 (Home Office, 2015)
- Children and Social Work Act (2017)
- Sexual Offences Act (2003)
- Education (Pupil Registration) Regulations 2006
- Information sharing advice for safeguarding practitioners (HMG, 2018)
- Data Protection Act (2018)
- What to do if you're worried a child is being abused (HMG, 2015)
- Searching, screening and confiscation (DfE, 2018)
- Preventing and Tackling Bullying (DfE, 2017)
- Mental Health and Behaviour in Schools (DfE, 2018)
- Female Genital Mutilation Act 2003 (S. 74 - Serious Crime Act 2015)
- Sexual violence and sexual harassment between children in schools and colleges (DfE, 2021)
- Independent School Standards Regulations 2014 (ISSRs) – statutory regulations
- Teaching Online Safety in School (DfE 2019)
- Children Missing Education (DfE 2016)
- Guidance for Safer Working Practice for Adults who work with Children and Young People in Education (May 2019)
- The Prevent Duty: Departmental advice for schools and childcare providers (DfE 2015)
- 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).
- North Yorkshire Community Safety Partnership Working with Individuals Vulnerable to Extremism
- NYSCP: Managing Allegations against those who volunteer or work with children

5. SAFEGUARDING CONTACT DETAILS

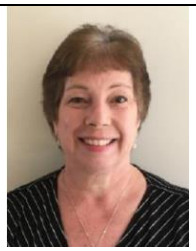
Our Designated Safeguarding Lead (DSL) is Dr Alastair Dunn. He is the primary point of contact for any safeguarding matter relating to students. If he is not available, one of the Deputy DSLs, listed below, are the next points of contact where you have concerns about a child. If for any reason, contact fails and you are concerned that a student is in immediate danger you must contact NYCC 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 you have concerns about a member of staff and their behaviour or conduct towards a child, you must contact the Head (as below) and if your concern is about the Head, you must contact the Chair of Trustees (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
Ampleforth College – Designated Safeguarding Lead (DSL)	**Dr Alastair Dunn** 	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
Ampleforth College – Deputy Designated Safeguarding Lead (DDSL)	**Jon Mutton** **(Deputy Head Pastoral, Wellbeing and Online Safety)** 	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
Ampleforth College - Deputy Designated Safeguarding Lead (DDSL)	**Angie Carey** 	angela.carey@ampleforth.org.uk Telephone number (term time): 01439 741117 Mobile number (term time): 07866 797326 Out of hours/term contact number: 07866 797326

Ampleforth College - Deputy Designated Safeguarding Lead (DDSL)	**Catherine Skinner**	catherine.skinner@ampleforth.org.uk Telephone number (term time): 01439 741114 Mobile number (term time):

		07866 127228 Out of hours/term contact number: 07866 127228
Ampleforth College - Deputy Designated Safeguarding Lead (DDSL)	**Emily Tomasi** 	emily.tomasi@ampleforth.org.uk Telephone number (term time): 01439 741117
Designated Teacher for Looked After Children	**John Devitt** **(Deputy Head Academic)** 	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
Where a concern is about a member of Staff		
Head	**Robin Dyer** 	Robin.Dyer@ampleforth.org.uk Telephone number (term time) 01439 766880
Where a concern is about the Head		
Chair of Trustees	**Edward Sparrow** 	c/o Clerk to the Trustees Janice Lightley jel@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	**999** or 101
North Yorkshire County Council Emergency Duty Team	**01609 780780**
North Yorkshire County Council Local Authority Designated Officer (LADO) *(for concerns about a staff member or volunteer)*	**01609 533080**
Children Missing in Education	Safeguardingunit@northyorks.gov.uk **01609 532477**
Prevent Channel (countering radicalisation and extremism)	Principal Safer Communities Officer (Community Safety and Prevent) Lesley Gray lesley.gray@northyorks.gov.uk 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 https://www.idas.org.uk/
CEOP (National Crime Agency Child Exploitation and Online Protection)	https://www.ceop.police.uk/Safety-Centre/
UK Safer Internet Centre	Tel: 0344 381 4772 Email: helpline@saferinternet.org.uk

Useful contacts for children and young people

ThinkUKnow (online safety)	https://www.thinkuknow.co.uk/

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

Whistleblowing

NSPCC Whistleblowing helpline	Tel: 0800 028 0285 Email: help@nspcc.org.uk
Charity Commission	Email: whistleblowing@charitycommission.gsi.gov.uk

7. KEY TRUSTEES

Chair of Trustees	**Edward Sparrow**	c/o Clerk to the Trustees Janice Lightley janice.lightley@ampleforth.org.uk Telephone number: 01439 766000

Nominated Safeguarding Trustee (oversight of safeguarding and receives assurances from the DSL team)	**Patrick McDermott** 	phm@ampleforth.org.uk Telephone number: c/o 01439 741113

8. REPORTING AND RECORD KEEPING

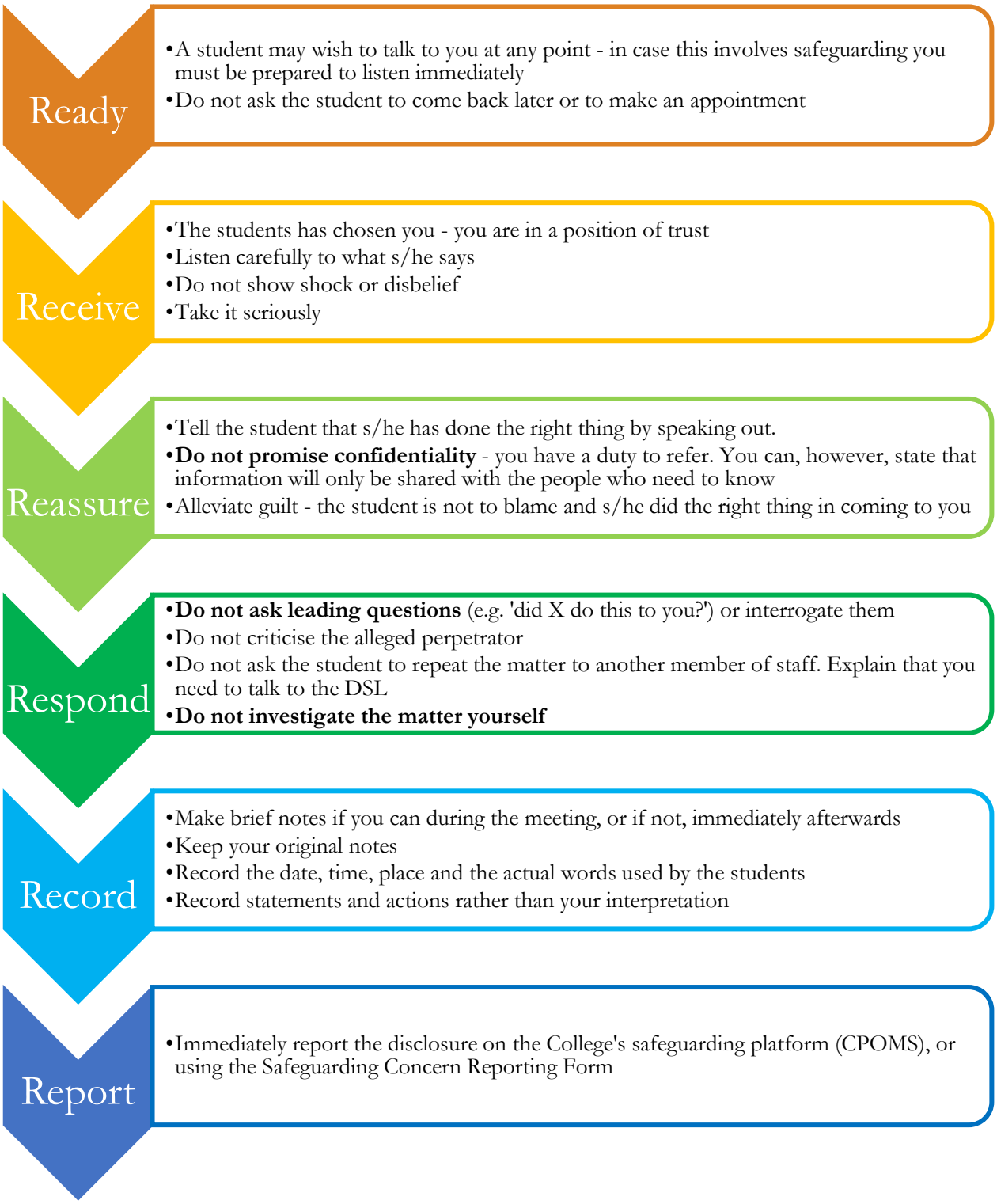
Any safeguarding concern about a student (other than as set out below in cases of suspected immediate risk of harm) must be logged by being uploaded onto the College's safeguarding platform (CPOMS) or reported using the Safeguarding Concern Reporting Form (see flowchart below). The DSL or one of the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

If you feel a student is **at risk of immediate harm** then you must contact the DSL directly rather than upload onto the College's safeguarding platform (CPOMS) or you can make an immediate referral to NYCC Emergency Duty Team and/or the Police [see contact details here] **Anyone can make a referral**. You must inform the DSL as soon as possible that a referral has been made.

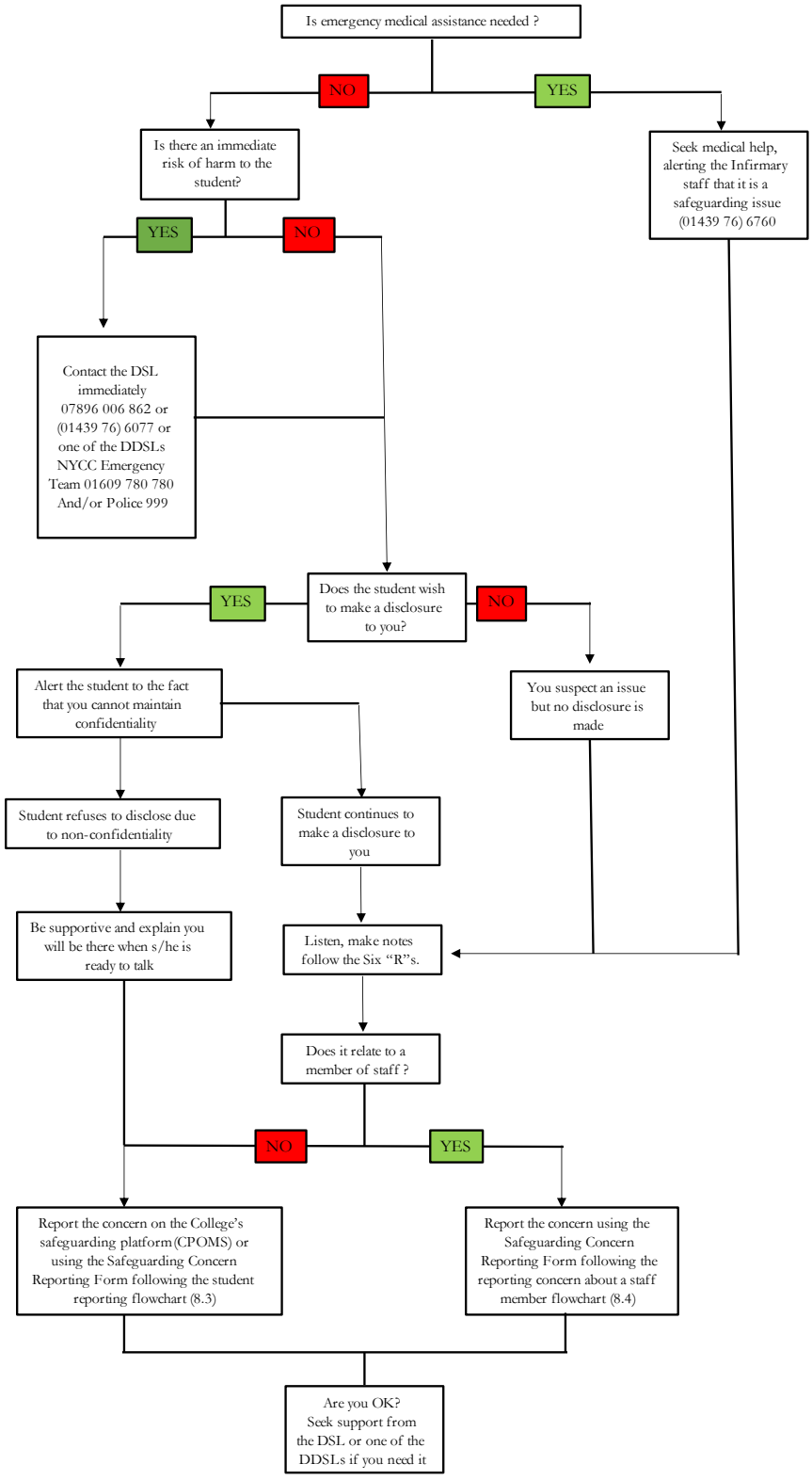
All records are kept securely away from other student files. If a student leaves the College to join another school or Sixth-form college then a secure transfer of safeguarding records will occur as soon as possible.

Procedures:

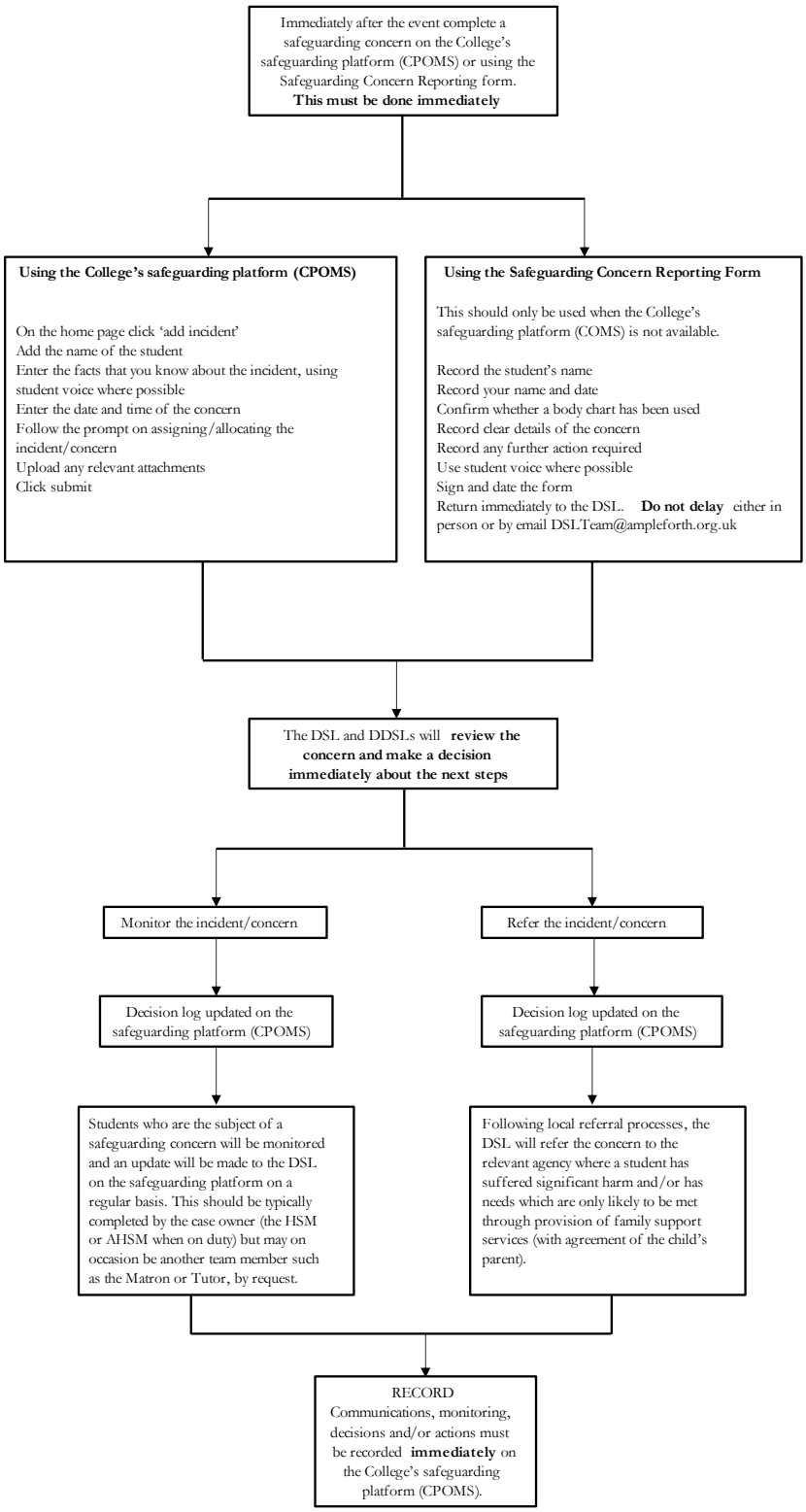
8.1 What to do if someone makes a disclosure:



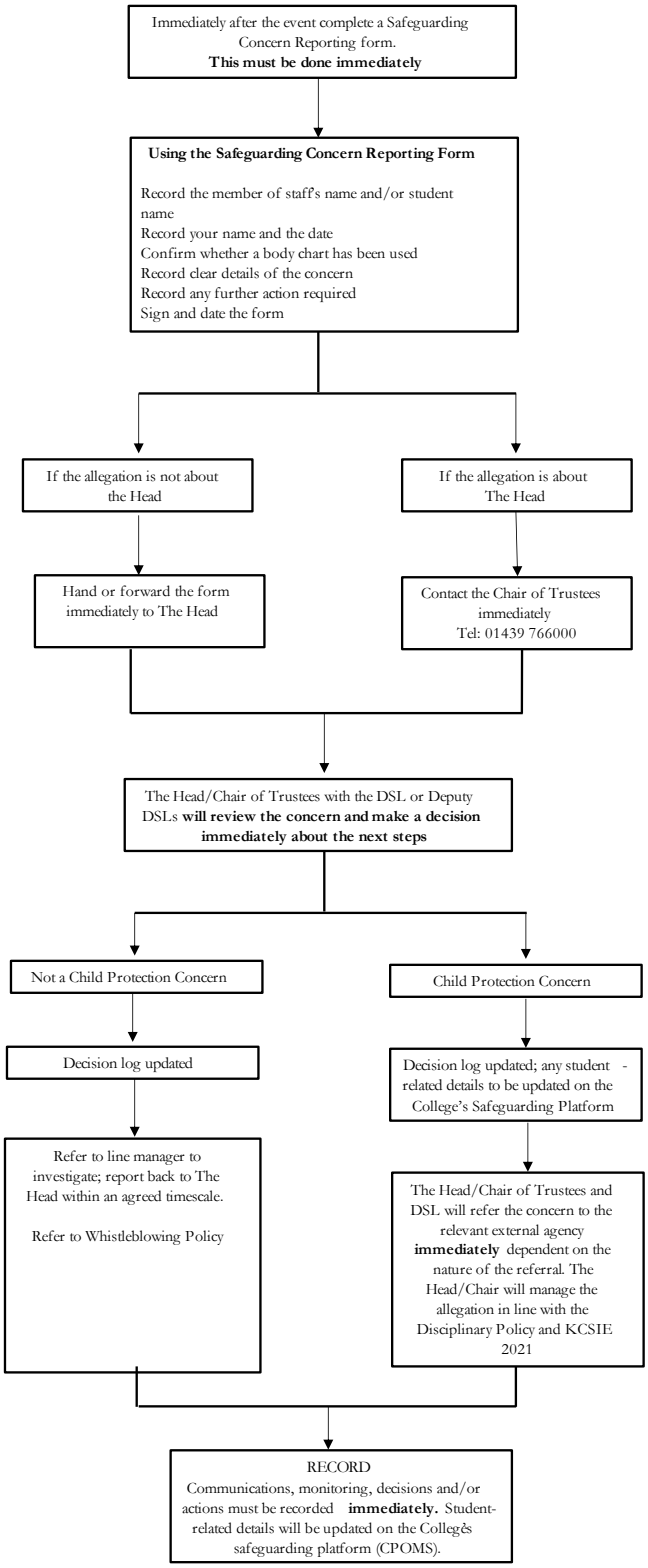
8.2 What to do if you suspect a student is suffering or likely to suffer harm



8.3 Reporting a concern about a student:


Immediately after the event complete a safeguarding concern on the College's safeguarding platform (CPOMS) or using the Safeguarding Concern Reporting form.
This must be done immediately
Using the College's safeguarding platform (CPOMS)
On the home page click 'add incident'
Add the name of the student
Enter the facts that you know about the incident, using student voice where possible
Enter the date and time of the concern
Follow the prompt on assigning/allocating the incident/concern
Upload any relevant attachments
Click submit
Using the Safeguarding Concern Reporting Form
This should only be used when the College's safeguarding platform (COMS) is not available.
Record the student's name
Record your name and date
Confirm whether a body chart has been used
Record clear details of the concern
Record any further action required
Use student voice where possible
Sign and date the form
Return immediately to the DSL. Do not delay either in person or by email DSLTeam@ampleforth.org.uk
The DSL and DDSLs will review the concern and make a decision immediately about the next steps
Monitor the incident/concern
Refer the incident/concern
Decision log updated on the safeguarding platform (CPOMS)
Decision log updated on the safeguarding platform (CPOMS)
Students who are the subject of a safeguarding concern will be monitored and an update will be made to the DSL on the safeguarding platform on a regular basis. This should be typically completed by the case owner (the HSM or AHSM when on duty) but may on occasion be another team member such as the Matron or Tutor, by request.
Following local referral processes, the DSL will refer the concern to the relevant agency where a student has suffered significant harm and/or has needs which are only likely to be met through provision of family support services (with agreement of the child's parent).
RECORD
Communications, monitoring, decisions and/or actions must be recorded immediately on the College's safeguarding platform (CPOMS).

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 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.

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.

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 Early Help is Appropriate and may be beneficial

Some students may benefit from early help, and you are expected to be able to identify such students where possible. 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 you consider that a student may benefit from early help you 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. 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.

If you believe that a student is in immediate danger or at risk of immediate harm, you must inform the DSL or one of the DDSLs immediately or make an immediate referral to NYCC 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 your telephone contact.

Parental consent is not needed for referrals to statutory agencies such as the police and 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, you must inform the DSL as soon as possible that a referral has been made and record this on the College's safeguarding platform (CPOMS).** You must challenge any inaction (on anyone's part) and follow this up with the DSL and children's social care as appropriate (see KCSIE Sep. 2021, p.17). 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. 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 or contact 101 (non-emergency number for the police).

10.4 Student Missing from Education

A student missing from education (CME) is a potential indicator of abuse. 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.

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

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.

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 PEER-ON-PEER/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 or peer-on-peer 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 peer-on-peer 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 peer-on-peer 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 understand that even if there are no reports of peer-on-peer abuse it does not mean it is not happening; it may be the case it is just not being reported. As such it is important if

staff have any concerns regarding peer-on-peer/child-on-child abuse they should speak to the DSL or one of the Deputy DSLs.

Peer-on-peer/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.

Peer-on-peer/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 peer-on-peer/child-on-child abuse are:

- Bullying amounting to peer-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 peer-on-peer/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).
- 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 as to your handling of any indecent images. **Remember: do 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 Peer-on-Peer/Child-on-Child Abuse

The College recognises it duty to minimise the risk of Peer-on-Peer/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. Every year group participates in this programme.
- The College's Harmful Sexual Behaviour Action Plan. The purpose of this plan is to reduce the risks of harmful sexual behaviour by a number of means, including 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 peer-on-peer/child-on-child abuse

- All students are made aware of how to report any safeguarding concern, including peer-on-peer/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.
- Fear of backlash from other students can be a powerful factor in deterring or delaying disclosures of peer-on-peer/child-on-child abuse and the College recognises the imperative of reassuring and supporting any victim making a disclosure.

How allegations of peer-on-peer/child-on-child abuse will be recorded, investigated and dealt with

- The College recognises that all allegations of peer-on-peer abuse are to be taken very seriously, and these will be treated as high-level safeguarding concerns.
- All allegations of peer-on-peer/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. (2021), Part 1 and Part 5 and, where appropriate, *Sexual Violence and Sexual Harassment in Schools and Colleges* (2021).

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 peer-on-peer/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 Children's Services and to the Police, as stipulated in KCSIE (Sep. 2021) Part 1 (p.18) and Part 5 (pp.106-8).
- The College will also signpost the victim to appropriate services, such as 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 peer-on-peer/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 you are concerned about peer-on-peer/child-on-child abuse, the child protection procedures set out in this policy and summarised in the flowcharts here must be followed, specifically, you must report your 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 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 (following *Sexual Violence and Sexual Harassment in Schools and Colleges* (2021) p.33) 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 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 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 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.

13 ONLINE SAFETY

Many of the concerns described above (for example sexual abuse, severe bullying and extremism and radicalisation) may occur online. The College recognises its duty to safeguard children from potentially harmful and inappropriate online material.

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, self-harm, suicide, anti-Semitism and extremism
- **contact:** being subjected to harmful online interaction with other users: for example: peer to peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** personal 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

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.

We ensure that the College network is appropriately filtered and 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).

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, you 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).

14 SAFEGUARDING SEND STUDENTS

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. 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 disproportionally 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 tell you about a concern.

You must 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 and the DSL as appropriate.

15 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 you have a mental health concern about a student, you must log this on the College's safeguarding platform (CPOMS) or the safeguarding concern reporting form immediately. If there are indications that they may be suffering, or at risk of suffering serious harm, contact the DSL or one of the DDSLs immediately or if contact cannot be made with any of these, NYCC 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.

16 STUDENTS WHO ARE LOOKED AFTER CHILDREN, OR WERE PREVIOUSLY LOOKED AFTER CHILDREN

Students who are looked after by a local authority, or who were previously looked after, can face additional safeguarding issues. If you have any concerns about this category of students, you 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.

17 STUDENT 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 practices such as breast ironing. If any evidence of such practices within a family comes to light you must report this on the College's safeguarding platform or the safeguarding concern reporting form immediately.

If you learn that an act of FGM appears to have been carried out on a girl aged under 18, you have a statutory duty to report it to the police. You 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. 2021) (p.133). See Appendix C.

18 ALLEGATION 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. 2021) paragraph 338, p.8) 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) we 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.

KCSIE (Sep. 2021) paragraph 338, p. 81 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.

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

Low-level concerns

A Low-level concern is defined as one that does not meet the threshold set out above (following paragraph 338 of KCSIE (Sep. 2021), 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.

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,
- using inappropriate sexualised, intimidating or offensive language.

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 2021, paragraph 74.)

Flowchart for reporting can be found here

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

Responding to reports of low-level concerns

The College should ensure that is has created an environment where staff are encouraged and 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.

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 should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a patten of such behaviour is identified, the College should 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.

19 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 you have concerns that we are not dealing with a child protection matter in accordance with our stated procedures, you must raise it under the school's Whistleblowing Policy, which can be found here.

Alternatively, if you feel that your genuine concerns are not being addressed, you may contact the NSPCC whistleblowing advice line (0800 028 0285 or help@nspcc.org.uk) or contact the Local Authority Designated Officer (LADO) when appropriate to do so in accordance with KCSIE (Sep. 2021).

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

20 MANAGEMENT OF SAFEGUARDING

We follow rigorous procedures to ensure that the welfare of students is paramount. These include the following:

20.1 RASHEN process

(see Appendix C).

During term-time the DDSL team meets weekly with the House Teams to discuss students who are the subject of safeguarding concerns, to review actions already taken, and to identify next steps.

In preparation for the RASHEN meetings, the DSL and the Head of Support for Learning meet weekly to consider students who are the subject of safeguarding concerns, and whose learning support needs may have a bearing on their safeguarding. The Head of Support for Learning (or a member of their team) will then either attend the relevant RASHEN meeting or will contribute a written comment to assist in the review of the student and the discussion of next steps.

The evaluations made and decisions taken in RASHEN meetings are added to the relevant student's profile on the College's safeguarding platform (CPOMS).

20.2 Monitoring

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

The DSL meets regularly with the Safeguarding Lead Trustee 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 Trustee oversight are described below in **Section 26.**)

21 SAFER RECRUITMENT

We take seriously our responsibility to recruit staff, Trustees, 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.

We undertake a rigorous recruitment and screening process, which is in line with the Independent Schools' Inspectorate, KCSIE (Sep. 2021) and National Minimum Boarding Standards regulations. The Human Resources team and other key staff who manage this process are trained in safer recruitment procedures.

We 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. 2021) and the Education (Independent School Standards) (England) Regulations 2014. Procedures are outlined in the school's Recruitment Policy.
- ensure that we carry out all necessary checks on the suitability of people who serve as Trustees in accordance with the above regulations and guidance given in KCSIE (Sep. 2021).
- 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. 2021). 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.

21.1 Visitors

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

22 STAFF CODE OF CONDUCT

The Staff Code of Conduct can be found (here) or requested as a hard copy document from your line manager. The Staff Code of Conduct provides clear guidance concerning your 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 we expect 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 you must comply with and where to find them.

23 RESPONSIBILITIES OF STAFF MEMBERS

You must maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a student, you 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 you must always report any concerns that you may have about a student on College's safeguarding platform (CPOMS) or using the Safeguarding Concern Reporting Form.

24 RESPONSIBILITIES OF THE DSL

The DSL is a member of the school'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 the DSL's responsibilities in conjunction with Deputy DSLs. The DSL and DDSLs have a job description and must fulfil their duties in line with Annex B of KCSIE (Sep. 2021).

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

Manage referrals

- 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 cases 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
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service, as required; and

- refer cases where a crime may have been committed to the Police as required, (the 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 he (or the person who made the referral) considers after a referral that the child's situation does not appear to be improving, 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. Hate crimes should also be reported to the police
- 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).

Work with others

- act as a point of contact with the three safeguarding partners
- as required, liaise with the 'case manager' 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.

- 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.

Undertake training

- Undergo 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.

- Undertake Prevent awareness training and Action Counter Terrorism (ACT) Training.

- Refresh their knowledge and skills (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments and news such as those provided by the NYSCP (https://www.safeguardingchildren.co.uk/professionals/nyscp-e-bulletin/) and NSPCC) at regular intervals, as required but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- Understand 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 each member of staff has access to and understands the College's child protection policy and procedures, especially new and part time staff;

- Identify training needs and deliver annual and on-going Safeguarding training for staff.

- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support the College with regards to the requirements of the Prevent duty, including online safety and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Obtain access to resources and attend any relevant or refresher training courses;
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them.
- 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 the College;
- Recognise the additional risks that children with SEN and disabilities (SEND) face online, for example from online bullying, grooming and radicalisation.
- Are able 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.

Raise Awareness

- Ensure the College's child protection policies are known, understood and used appropriately.
- Ensure 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 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; and
- 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.

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 designated safeguarding leads and SENDCOs or the named person with oversight for SEND in colleges, are aware as required. In addition to the child protection file, the designated safeguarding lead 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 designated safeguarding lead 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.

- Ensure 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.

- Ensure that the North Yorkshire Children & Families Service is informed when the child leaves the College. NYCC Elective Home Education Policy and Procedures can be accessed for further guidance.

Availability

- During term time always be available (during College hours) for staff in the College to discuss any safeguarding concerns. Whilst generally speaking the DSL (or a designated DDSL) would be expected to be available in person, in exceptional circumstances availability via phone, Teams and or Skype or other such media is acceptable
- Arrange adequate and appropriate cover arrangements for any out of hours/out of term activities
- Ensure 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 designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to ensure:

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

Understanding the views of children

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.

25 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.

26 TRUSTEE ARRANGEMENTS FOR SAFEGUARDING

Trustees 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 Trustees ensure there is an effective Safeguarding Policy in place, which has due regard to *Keeping Children Safe in Education* (Sep. 2021) and that the policy is implemented in practice. They receive safeguarding

training and have confirmed that they have read and understand *Keeping Children Safe in Education* (Sep. 2021).

The Safeguarding Lead Trustee has the required knowledge, skills and expertise to be the primary point of governance oversight of the College's safeguarding arrangements. The Safeguarding Lead Trustee meets regularly 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. Detailed minutes of these meetings are taken. The Safeguarding Lead Trustee also appraises the College's Safeguarding Committee, a committee acting with delegated authority from the Trustees with responsibility for ensuring that College safeguarding practices and procedures, and their application, are effective in keeping students safe.

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. It meets once per month and minutes of these meetings are taken.

The Chair of Trustees also ensures that the DSL provides reports to the Board as required and that a comprehensive report is provided on an annual basis. The Trustees undertake an annual review of all College policies and procedures, including those relating to child protection, and 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.

The Trustees promote a safe culture through the commitments enshrined in the Safeguarding Charter.

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		

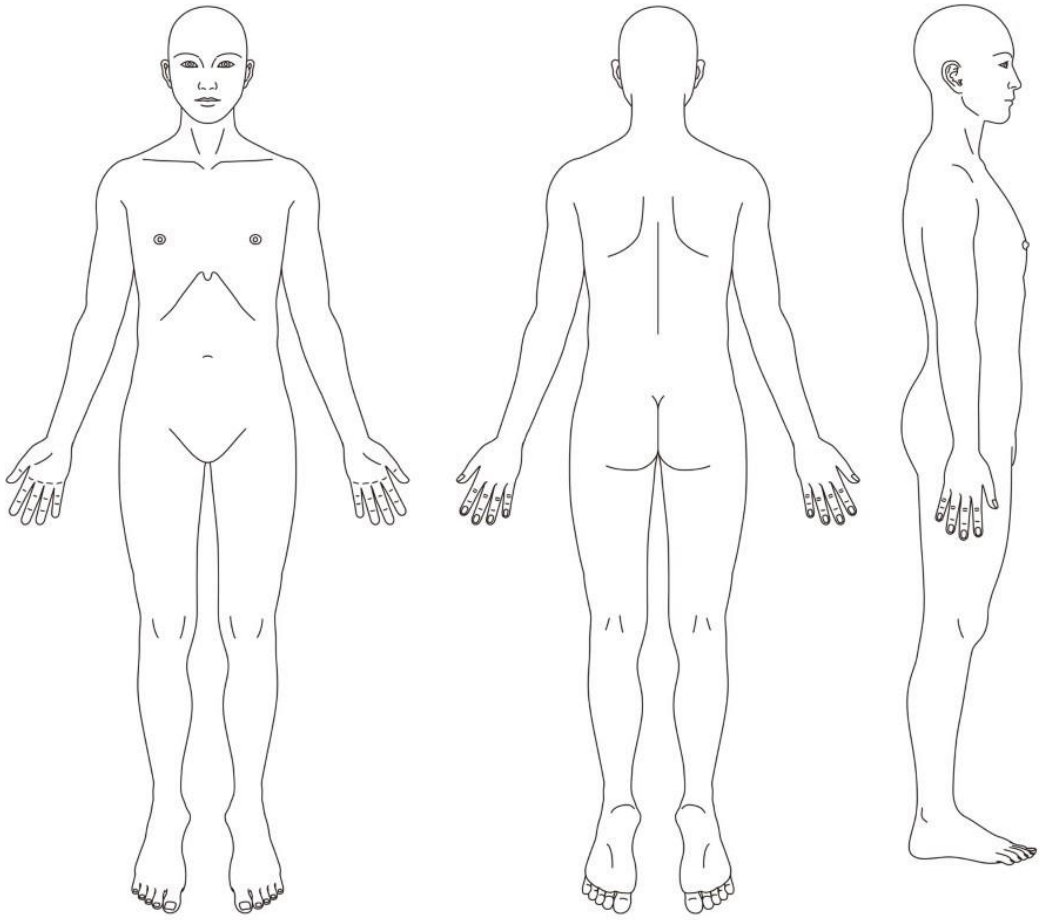
Further action required	Date of action	Action taken by	Signature

Give to DSL in person (if concern is about a student). **Give to the Head in person (if the concern is about a member of staff)**			
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 DSLTeam@ampleforth.org.uk / head@ampleforth.org.uk 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.

You 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**motional wellbeing, **N**ext steps

Example

R- A student discloses self-harm and an eating disorder

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 – ensure early support is arranged and refer to appropriate external agencies

How often to RASHEN

Every week during term-time the safeguarding team will conduct a RASHEN meeting in which students who are the subject of a safeguarding concern will be discussed to: review the outcomes of any actions already undertaken; and identify any further steps that are required. RASHEN meetings will also decide whether a specific concern or incident that has been raised for a student should be closed or remain open for further monitoring.

Appendix D: 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

Sanctions Policy

Missing Student Policy

Mobile Phone Policy

Online Safety Policy

Physical Contact and Physical Intervention Policy

Visitor Policy

Prevent Policy

Rewards and Sanctions Policy

Statement of Boarding

Students' Complaints and Concerns Policy