



KING'S COLLEGE SCHOOL
ALICANTE

King's Group Policy Safeguarding & Child Protection

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Contents

1. Safeguarding in our College	5
1.1 Our aims and responsibilities	5
1.2 Definition of safeguarding	5
1.3 Who this policy applies to	5
1.4 Information sharing and inter-agency working	5
1.5 Definitions and terminology	6
1.6 Related documentation	6
1.7 Internal documents	7
2 Key safeguarding facts	8
3 Contact Details	9
4 Types of abuse	11
4.1 Abuse	11
4.2 Physical abuse	11
4.3 Emotional abuse	11
4.4 Sexual abuse	11
4.5 Neglect	12
4.6 Behavioural signs of abuse and neglect	12
4.7 Children with Special Educational Needs and/or Disabilities	12
4.8 Signs of abuse or neglect manifested by the parents or other responsible adult	13
4.9 Grooming	13
4.10 Signs of grooming and/or online abuse	13
4.11 Signs of grooming manifested by sex offenders	13
4.12 Modus operandi of institutional grooming	14
4.13 Signs of grooming for radicalisation	14
4.14 Specific safeguarding issues	15
4.15 Children missing or absent from education	15
4.16 Child sexual exploitation	15
4.17 Female genital mutilation	16
4.18 Forced marriage	16
5 Child on child abuse	17
5.1 What is child on child abuse?	17
5.2 What role does gender play?	17
5.3 When does behaviour become abusive?	17
5.4 How can I identify victims of child on child abuse?	17
5.5 Are some children particularly vulnerable to abusing or being abused by their peers?	18
5.6 How prevalent is child on child abuse?	18
5.7 What should I do if I suspect either that a child may be being abused, or that a child may be abusing others?	18
5.8 How will the DSL respond to concerns of child on child abuse?	18
5.9 How does the College raise awareness of, and reduce the risk, of child on child abuse?	19

6 Sexual Violence and Sexual Harassment between Children	20
Contextual safeguarding	20
7 Stages of child protection	22
7.1 Early Help	22
7.2 Children in Need	22
7.3 Children suffering or likely to suffer significant harm	22
7.4 What to do if you have a concern about a child	23
Maintain confidentiality	23
Receiving a report of harmful sexual behaviour	23
Use of reasonable force	23
7.4.1 Recording	24
Managing support for pupils internally	24
7.4.2 Making referrals to statutory agencies	24
Confidentiality	25
8 Whistleblowing	26
9 The role of the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead	27
9.1 Deputy DSL	27
9.2 Inter-agency working	27
9.3 Support for DSL	27
9.4 Manage referrals	27
9.5 Work with others	27
9.6 Training	28
9.7 Raise awareness	28
9.8 Safeguarding Files	29
9.9 Availability	29
10 Responsibilities of the proprietor	29
11 Induction	31
12 Training	32
12.1 Staff employed in College	32
12.2 Third-party contractors	32
12.3 Teaching about safeguarding	32
13 Online safety	33
13.1 Youth produced sexual imagery/'Sexting'	33
13.2 What is youth produced sexual imagery?	33
13.3 What types of incidents are covered by this policy?	33
13.4 Disclosure	34
13.5 Handling incidents	34
14 Host families	35
15 Use of mobile technology	35
16 Low level concerns	35
16.1 Code of Conduct	35
16.2 Our low-level concern policy	36
16.3 What is a low-level concern?	36

16.4 Low-Level Concerns about self (self-reporting)	36
16.5 Low-level concerns about an adult	36
16.6 What should I do if I have one?	36
16.7 How will my low-level concern be handled?	36
16.8 What records will be kept?	37
17 Allegations of abuse made against teachers and other staff	37
17.1 What is an allegation?	37
17.2 What should I do if I have an allegation?	37
17.3 Duties as an employer and an employee	37
17.4 Dealing with an allegation	37
Disclosure of information	38
17.5 Further action to be taken by the College	38
17.6 Oversight and monitoring	38
17.7 Outcome of an allegation	38
17.8.Ceasing to use staff	39
17.9 Malicious or unsubstantiated allegations	39
17.10 Learning lessons	39
17.11 Record keeping	39
17.12 References	39
18 Risk assessment	40
19 Monitoring and review	40
20 Record keeping	41

1. Safeguarding in our College

1.1 Our aims and responsibilities

Our commitment is to safeguard and promote the welfare, health (including mental health) and safety of our pupils by creating and maintaining an open, safe, caring and supportive atmosphere.

This includes:

- Proactively teaching pupils about safeguarding
- Ensuring that systems and procedures are in place to protect pupils
- Acting in the best interests of the child

All staff have the following responsibilities:

- Contribute to providing a safe environment in which all children can learn and flourish
- Know what to do if a child tells you that he or she is being abused or neglected
- Know what to do if you are concerned about the behaviour or conduct of an adult in the College
- Manage the requirement to maintain an appropriate level of confidentiality
- Identify children who may benefit from Early Help
- Refer any concern to the Designated Safeguarding Lead (DSL) or the Deputy DSLs
- Be aware of our local Early Help process and our role in it
- Be aware of the process for making a referral to Spanish Children's Social Care and understand the role you might be expected to play in statutory assessments

1.2 Definition of safeguarding

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education as:

- protecting children from maltreatment;
- preventing impairment of children's 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.

In our College, safeguarding is everyone's responsibility

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

1.3 Who this policy applies to

This policy and procedure applies to all pupils in the College, including those in the early years.

This policy and procedure applies to all teaching, non-teaching, residential, pastoral, support, peripatetic, contract staff and ancillary staff, volunteers, non-College based King's staff and any other adults working at the College. All references in this document to "staff" or "members of staff" should be interpreted as relating to the aforementioned, unless otherwise stated. It applies to adults in the early years' phase of the College.

This Safeguarding Policy and the Code of Conduct applies to all pupils and adults in the College, including when being educated off-site and undertaking an educational visit. It also applies to students who are on an exchange and being hosted by the College.

1.4 Information sharing and inter-agency working

The College is committed to inter-agency working in order to secure the best levels of safeguarding for all of its pupils and understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of pupils, which is always the College's paramount concern. The College understands that the GDPR and Data Protection Act 2018 provide a framework to ensure that personal information is shared appropriately.

The College contributes to inter-agency working in accordance with statutory guidance. The College works with social care, the police, health services and other services to promote the welfare of children and protect them from harm and ensure that all relevant information is shared for the purposes of early help assessments, and assessments and child protection investigations under the Children Act 1989. The College will also work within best practice requirements of the UK's Local Safeguarding Children Board (LSCB).

While the College will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

1.5 Definitions and terminology

'Children' includes everyone under the age of 18.

'DSL' refers to the College's named Designated Safeguarding Lead. References to the DSL include the Deputy DSLs where the DSL is unavailable.

'LSCB' refers to the Local Safeguarding Children Board

'Designated Officer' refers to the person appointed by the local authority to deal with allegations against adults

'KCSIE' refers to the statutory guidance Keeping Children Safe in Education 2022

1.6 Related documentation

This policy should be read in relation to the most current version of the following documents:

- The Education (Independent College Standards) Regulations 2014
- Boarding Colleges: national minimum standards (2015)
- [Keeping Children Safe in Education \(Sep 2023\)](#)
- Working Together to Safeguard Children (July 2018)
- Prevent Duty Guidance: for England and Wales (July 2015)
- Channel duty guidance: protecting vulnerable people from being drawn into terrorism (April 2015)
- Multi-agency statutory guidance on female genital mutilation (April 2016)
- Disqualification under the Childcare Act (August 2018)
- What to do if you are worried a child is being abused – Advice for practitioners (departmental advice) (March 2015)
- Educate Against Hate (2018)
- [Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (July 2018);
- [Sexting in Colleges and colleges: responding to incidents and safeguarding young people \(UKCCIS, August 2016\);](#)
- [Children missing education \(September 2016\);](#)
- [Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation \(February 2017\);](#)
- [Sexual violence and sexual harassment between children in Colleges and colleges \(May 2018\)](#)
- Early Years Foundation Stage Framework (Feb 2018)

This policy is updated annually, drawing on feedback from staff, and is published to all staff and volunteers and placed on the College website. This policy is based on KCSIE 2023 and any references to national guidance made within this document are in relation to the versions listed above. The College will always work within local laws and regulations whilst referring to the above statutory guidance as the benchmark for all safeguarding practice and decision making and will follow the UK inter-agency procedures of the LSCB.

1.7 Internal documents

- Behaviour Policy
- Anti-bullying Policy
- Online Safety Policy
- Exclusion Policy
- Mobile Phone Policy
- Preventing Extremism and Radicalisation Policy
- Safer Recruitment Policy
- Staff Code of Conduct and Acceptable Use Policy
- Whistleblowing Policy
- Risk assessment Policy
- Youth Produced Sexual Imagery Policy
- SEN Policy
- Health and Safety Policy

2 Key safeguarding facts

- The safety and wellbeing of our pupils is our number one priority
- Safeguarding and promoting the welfare of children is everyone's responsibility
- We are a 'sharing organisation'
- All concerns should be reported
- We operate within a culture of openness and recognise and accept that abuse can happen in any organisation
- All concerns about a child (including signs of abuse and neglect) must be reported immediately to the Designated Safeguarding Lead (DSL) or, in their absence, to the Deputy Designated Safeguarding Lead (DDSL)
- In the event that a child is suffering, or is likely to suffer from harm, a referral should be made to Children's Social Care and/or the police immediately

3 Contact Details

The following pages outline the contact details of named staff in College, King's Group and external agencies linked to child protection and safeguarding.

College & King's Group Contacts	
Designated Safeguarding Lead (DSL)	Sharmila Gandhi (sharmila.gandhi@kings.education) 00 34 616 968 382
Deputy Designated Safeguarding Leads (DDSLs)	Carrie Castro Matthew Bennett Maeva Rodriguez Adrian Hickman
Executive Headteacher	Simon Wicks 00 34 638 37 52 73
Any other staff trained to DSL level	
Safeguarding Governor	Elena Benito

Other Services	
Local Police (Emergency)	112 / 091
Local Police (Alicante Minors' Unit)	965 149 537 / 965 107 200
Social Services (Alicante)	965 20 94 99
Other Useful Contacts:	Comisaría Central Policía Nacional Alicante: 965 14 88 88

Location of child protection documents in College	
English and National Guidance documents (e.g. referral forms etc)	Maeva Rodriguez's office
All other documentation	MyConcern system

UK Contacts	
NSPCC 24/7 Helpline	Email: help@nspcc.org.uk
NSPCC Text line	00 44 88858
NSPCC ChildLine	00 44 800 1111
NSPCC FGM helpline	00 44 800 028 3550 fgmhelp@nspcc.org.uk
NSPCC Whistleblowing helpline	00 44 800 028 0285 (9am – 9pm CET) help@nspcc.org.uk

DfE Prevent helpline	00 44 20 7340 7264 counter.extremism@education.gsi.gov.uk
The Lucy Faithfull Foundation (LFF)	00 44 800 1000 900 help@stopitnow.org.uk
National Bullying Helpline	00 44 845 22 55 787
UK Safer Internet Centre helpline	00 44 844 381 4772 helpline@saferinternet.org.uk
Internet Watch Foundation hotline	www.iwf.org.uk
Educate Against Hate	http://educateagainsthate.com

4 Types of abuse

The term 'abuse' is often used as an umbrella term. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Abuse and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

4.1 Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

4.2 Physical abuse

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.

Signs of physical abuse can include:

- injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen;
- respiratory problems from drowning, suffocation or poisoning;
- untreated or inadequately treated injuries;
- bruising which looks like hand or finger marks or caused by an implement;
- cigarette burns, human bites; or
- scarring, scalds and burns.

4.3 Emotional abuse

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

Signs of emotional abuse tend to be behavioural rather than physical (see below).

4.4 Sexual abuse

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

Signs of sexual abuse displayed by children may include:

- pregnancy
- sexually transmitted infection/diseases;
- pain/itching/bleeding/bruising/discharge to the genital area/anus/mouth;

- urinary infections;
- difficulty walking or sitting or standing;
- persistent sore throats; or
- stomach aches

4.5 Neglect

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

Signs of possible neglect include:

- the child seems underweight or is very small for their age, or their weight deteriorates;
- the child seems very overweight for their age;
- they are poorly clothed, with inadequate protection from the weather;
- they are often absent from College for no apparent reason; or persistently arrive late: or
- they are regularly left alone, or in charge of younger brothers or sisters.

Affluent neglect is when a child has their material needs met but not their emotional needs.

This form of neglect is often seen in affluent families and is regularly well hidden and hard to identify. The common indicators of neglect are often focussed on physical aspects and therefore in affluent families it can appear as if all is well in the child's life. Affluent neglect can take many different forms:

- The parents/carers of the children are busy people and leave the general care of the child to the maids / nannies. The child may have lots of adults in their life but none is taking responsibility for the child's emotional needs. Care is equated to ensuring the child has all the physical things they need.
- The cultural context of our school and the cultures that make up our community can see children being placed under huge pressure to achieve academically as well as being pushed to engage in many extra-curricular activities. This creates an environment for the child where very little interaction with their parents occurs and their emotional needs are ignored.
- The status of families and their place in society can lead to situations where the parent's status comes before the child's needs. For example staff not wanting to 'get involved' with certain affluent families so not reporting concerns or when parents/carers block formal assessments of a child's needs or reject therapy if needed because of perceived stigmas attached. This can sometimes be seen in our context around the valuable role counsellors play and a real reluctance to support their child in this process. Equally, affluent neglect can be seen where the pressure to succeed sees some parents/carers actively seeking unnecessary formal assessments of their child to provide a reason why their child may not be as successful as they, or their perceived status, determines.

Studies in the field of affluent neglect in fee-paying independent schools in the UK find:

- Affluent parents/carers are far less likely to have their child be subject to child protection investigations
- Neglect is more hidden within affluent families as the ready availability of material and human resources in the family situation can deflect and mask the neglect.
- Whilst schools readily identify neglect linked to poverty, affluent neglect is far less detected and often occurs over much longer periods of time before concerns are raised.

4.6 Behavioural signs of abuse and neglect

If a child is being abused, their behaviour may change in a number of ways.

For example, they may:

- behave aggressively or be disruptive, act out, demand attention and require more discipline than other children;
- become angry or disinterested and/or show little creativity;
- seem frightened of certain adults;
- become sad, withdrawn or depressed; have trouble sleeping;
- become sexually active at a young age;
- exhibit inappropriate sexual knowledge for their age or sexualised behaviour in their play with other children;
- refuse to change for gym or participate in physical activities;
- develop eating disorders;
- self-harm;
- refuse to attend College or run away from home;
- lack confidence or have low self-esteem; or
- use drugs or alcohol.

Possible signs of affluent neglect include:

- The child indicates their parents/guardians work long hours or are away from home regularly.
- When discussing activities you would expect a parent to undertake with their child secondary caregivers are named: e.g. maids/nannies, drivers.
- The child may have expensive accessories and items (phones/bags etc) but lack basic items (appropriate lunches, the correct equipment) and are regularly unorganised at school arriving with necessary items.
- Communication with the parents/guardians is very limited and often through a third party e.g. maids/nannies, drivers, personal assistants. This may be seen in PTC attendance, signing of letters sent home, email communication.
- The parent can be overly concerned with the achievement of the child and take a highly inappropriate interest in their achievement.
- The child reports they feel under incredible pressure from the family to succeed.

4.7 Children with Special Educational Needs and/or Disabilities

Children with special educational needs (SEN) and/or disabilities are statistically more vulnerable to child abuse, including child on child abuse. Additional barriers can exist when recognising abuse and neglect in this group of children.

These include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- that children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these challenges.

The Proprietor ensures that staff have the skills, knowledge and understanding to keep looked after children safe and the information they need in relation to a child's looked after legal status, for example:

- whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order;
- contact arrangements with birth parents or those with parental responsibility;
- information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

The DSL maintains these details, including contact details of the child's social worker.

The DSL maintains details of the local authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

4.8 Signs of abuse or neglect manifested by the parents or other responsible adult

- unrealistic expectations of the child i.e. demand a level of academic or physical performance of which they are not capable;
- offers conflicting or unconvincing explanation of any injuries to the child;
- appears indifferent to or overtly rejects the child;
- denies existence of or blames the child for the child's problems at home or at College;
- sees and describes the child as entirely worthless, burdensome or in another negative light;
- refuses offers of help for the child's problems; or
- is isolated physically/emotionally.

4.9 Grooming

Grooming is the process by which an individual prepares a child, significant adults and the environment for abuse of this child. Children and young people can be groomed online or in the real world, by a stranger or by someone they know. Groomers may be male or female. They could be any age. Many children and young people do not understand that they have been groomed, or that what has happened is abuse. The signs of grooming are not always obvious. Groomers will also go to great lengths not to be identified.

Children may:

- be very secretive, including about what they are doing online;
- have older boyfriends or girlfriends;
- go to unusual places to meet friends;
- have new things such as clothes or mobile phones that they can't or won't explain;
- have access to drugs and alcohol;
- go missing from home or College;
- display behavioural changes;
- have sexual health issues; or
- present as suicidal, self/harming, feeling depressed, unworthy.

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age. See the NSPCC website for further information about grooming,

4.10 Signs of grooming and/or online abuse

A child may be experiencing abuse online if they:

- spend lots, much more, or much less time online, texting, gaming or using social media;
- are withdrawn, upset or outraged after using the internet or texting;
- are secretive about who they're talking to and what they're doing online or on their mobile phone; and/or
- have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

4.11 Signs of grooming manifested by sex offenders

It is important to remember that not all sex offenders will exhibit the signs listed below and if an individual exhibits some or all of these signs, it does not mean that they are a sex offender:

- Overly affectionate behaviour with a child
- Affording special attention or preferential treatment to a child
- Excessive time spent alone with a child outside of the classroom/College
- Frequently spending time with a child in private or isolated areas
- Transporting a child to or from the College
- Making friends with a child's parents and visiting their home
- Acting as a particular child's confidante
- Giving small gifts, money, toys, cards, letters to a child

- Using texts, telephone calls, e-mails or social networking sites to inappropriately communicate with a child
- Flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a child

4.12 Modus operandi of institutional grooming

- Target vulnerable victim: Perpetrators target victims who are vulnerable, isolated, insecure and/or have greater emotional needs.
- Gain victim's trust: Offenders may allow a child to do something (e.g. eat ice cream, stay up late, view pornography) which is not normally permitted by the child's parents or the College in order to foster secrecy.
- Gain the trust of others: Institutional offenders are often popular with children and parents, successfully grooming not only the victim but also other members of the victim's family and the community at large.
- Filling a need/becoming more important to the child: This can involve giving gifts, rewards, additional help or advice, favouritism, special attention and/or opportunities for special trips or outings.
- Isolating the child: The perpetrator may encourage dependency and subtly undermine the victim's other relationships with friends or family members.
- Sexualising the relationship: This can involve playful touches, tickling and hugs. It may involve adult jokes and innuendo or talking as if adults, for example about marital problems or conflicts.
- Maintaining control and secrecy: Offenders may use their professional position to make a child believe that they have no choice but to submit to the offender.

4.13 Signs of grooming for radicalisation

There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are a number of signs that together increase their risk of being groomed in this way. Signs of vulnerability include:

- Underachievement
- Being in possession of extremist literature
- Poverty
- Social exclusion
- Traumatic events
- Global or national events
- Religious conversion
- Change in behaviour
- Extremist influences
- Conflict with family over lifestyle
- Confused identity
- Victim or witness to race or hate crimes
- Rejection by peers, family, social groups

4.14 Specific safeguarding issues

Annex A of Keeping Children Safe in Education contains further guidance on a range of specific safeguarding issues. This section should be read by all staff that work directly with children.

Any person that has a concern about a child within the College must follow the procedures outlined within this document.

Annex A of KCSIE contains guidance on the following issues:

- Children and the court system
- Children missing from education
- Children with family members in prison
- Child sexual exploitation
- Child criminal exploitation: county lines
- Domestic abuse
- Homelessness
- So-called 'honour-based' violence
- Preventing radicalisation (see separate Preventing Extremism and Radicalisation Policy)
- child on child abuse
- Sexual violence and sexual harassment between children in Colleges and colleges

Staff should be particularly aware of the safeguarding issues set out below.

4.15 Children missing or absent from education

Children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. College attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this policy if any absence of a pupil from the College gives rise to a concern about [• his / her] welfare.

Where reasonably possible the College will hold more than one emergency contact for each pupil.

The College shall inform the local Spanish authority of any pupil whose attendance falls below 80% in line with local laws.

This will assist the local authority to:

- fulfil its duty to identify children of compulsory College age who are missing from education; and
- follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

The College shall inform the local authority of any pupil who:

- fails to attend College regularly; or
- has been absent without the College's permission for a continuous period of ten College days or more, at such intervals as are agreed between the College and the local authority (or in default of such agreement, at intervals determined by the Secretary of State)

4.16 Child sexual exploitation

Child sexual exploitation is a form of 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:

- in exchange for something the victim needs or wants; and / or
- 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. Some of the following signs may be indicators of child sexual abuse, including children who:

- appear with unexplained gifts or new possessions;
- associate with other young people involved in exploitation;
- have older boyfriends or girlfriends;

- suffer from sexually transmitted infections or become pregnant;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss College or education or do not take part in education.

4.17 Female genital mutilation

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 of the [Multi-agency statutory guidance on FGM \(HM Government, April 2016\)](#) (pages 59-61 focus on the role of Colleges).

All staff must be aware of the requirement for teachers to report where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. The report should be made to the DSL. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance [Mandatory reporting of female genital mutilation - procedural information \(December 2016\)](#) for further details about the duty.

4.18 Forced marriage

Forced marriage is a crime in Spain, England and Wales. This can occur when an individual (male or female) is forced to marry without their full consent, when they do not have the capacity to consent (i.e. they have learning needs) or where they are coerced to marry either through psychological/emotional threats or other means. More information can be found in KSCIE (2023).

Staff should speak to the DSL if they have any concerns. As best practice pages 32-36 of the [Multi-agency guidelines: handling case of forced marriage](#) are used to support the role of Colleges in detecting and reporting forced marriage. Any suspicion will be reported to the local Spanish Social Services. The UK Forced Marriage Unit can be contacted on 020 7008 0151 or fm@fco.gov.uk for advice and information.

4.19 Child criminal exploitation - County Lines

A geographically widespread form of harm that is a typical feature of county lines criminal activity is the criminal exploitation of children and young people. This is usually through engaging them into gangs and using them to carry money or drugs from urban areas to suburban and rural areas, market and seaside towns. Staff should be aware of the signs of criminal exploitation such as children missing education. More information can be found in KCSIE (2023).

5 Child on child abuse

All staff should be alert to the risk of child on child abuse and understand their role in preventing, identifying and responding to it. Staff should know that children are capable of abusing their peers. They should never dismiss abusive behaviour as a normal part of growing up, 'banter' or 'just having a laugh', and should not develop high thresholds before taking action. Abuse is abuse and child on child abuse should be taken as seriously as abuse by adults.

5.1 What is child on child abuse?

For these purposes, child on child abuse is any form of abuse perpetrated by a child towards another child. It can take many different forms, including, but not limited to: bullying (including cyber-bullying); physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; harmful sexual behaviour (see below); sexting (also known as youth produced sexual imagery); and initiation / hazing type violence and rituals.

These categories of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others. Youth produced sexual imagery can but does not always constitute abusive behaviour. All incidents involving youth produced sexual imagery should be responded to with reference to the College's policy and in accordance with this policy (see below).

5.2 What role does gender play?

Child on child abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

5.3 When does behaviour become abusive?

It can be difficult to distinguish between abusive behaviour, which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse, such as low level bullying (where the [College's Preventing and Tackling Policy](#) should be followed) or age appropriate sexual experimentation.

Factors which may indicate that behaviour is abusive include:

- a) where it is repeated over time and/or where the perpetrator intended to cause serious harm:
- b) where there is an element of coercion or pre planning and
- c) where there is an imbalance of power, for example, as a result of age, size, social status or wealth.

This list is not exhaustive and staff should always use their professional judgement and discuss any concerns with the DSL.

5.4 How can I identify victims of child on child abuse?

Identifying child on child abuse can be achieved by being alert to children's well-being and to general signs of abuse. Signs that a child may be suffering from child on child abuse overlap with those relating to other types of abuse – see indicators of abuse, earlier in this document. Signs can include:

- a) failing to attend College, disengaging from classes or struggling to carry out College related tasks to the standard you would ordinarily expect.
- b) physical injuries.
- c) having difficulties with mental health and/or emotional wellbeing.
- d) becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much.
- e) drugs and/or alcohol use.
- f) changes in appearance and/or starting to act in a way that is not appropriate for the child's age.

This list is not exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

5.5 Are some children particularly vulnerable to abusing or being abused by their peers?

Any child can be affected by child on child abuse and staff should be alert to signs of such abuse amongst all children. Research suggests that:

- a) child on child abuse is more prevalent amongst children aged 10 and older, although it also affects younger children, including by way of harmful sexual behaviour.
- b) children who are particularly vulnerable to abuse or to abusing others include those who have (i) witnessed or experienced abuse or violence themselves; (ii) suffered from the loss of a close family member or friend; or (iii) experienced considerable disruption in their lives.
- c) children with SEN/D are particularly vulnerable to both abuse and child on child abuse.

5.6 How prevalent is child on child abuse?

Recent research suggests that child on child abuse is one of the most common forms of abuse affecting children in the UK. For example, more than four in ten teenage Collegiate girls aged between 13 and 17 in England have experienced sexual coercion (Barter et al 2015). Two thirds of contact sexual abuse experienced by children aged 17 or under was perpetrated by someone who was also aged 17 or under (Radford et al 2011) and over a third of young boys in England admitted to watching porn and having negative attitudes towards women (University of Bristol and University of Central Lancashire, 2015).

5.7 What should I do if I suspect either that a child may be being abused, or that a child may be abusing others?

If a member of staff thinks for whatever reason that a child may be at risk of abuse from another child or young person, or that a child may be abusing others, the member of staff should report their concern to the DSL without delay in accordance with this policy. If a child is suffering or is likely to suffer from harm, it is important that a referral to Children's Social Care and/or the police is made immediately.

5.8 How will the DSL respond to concerns of child on child abuse?

The DSL will discuss the behaviour with the member of staff and will, where necessary, take any immediate steps to ensure the safety of the victim(s) or any other child. Where the DSL considers or suspects that the behaviour might constitute abuse, Children's Social Care will be contacted immediately and, in any event, within 24 hours of the DSL becoming aware of it. The DSL will discuss the incident with Children's Social Care and agree on a course of action, which may include (a) taking any steps to ensure the safety and wellbeing of any children affected; (b) further investigation; (c) referral to other agencies such as the police (where a crime may have been committed).

If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 of KCSIE and take into account the local response of the police and Children's Social Care to these issues.

Any response should be decided in conjunction with Children's Social Care and other relevant agencies and should:

- investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other children;
- consider that the abuse may indicate wider safeguarding concerns for any of the children involved
- treat all children (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves;
- take into account the complexity of child on child abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited, they are not consenting
- take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it, attitudes underlying it and the support that may be needed if the perpetrator is at risk.

Factors to consider include: the risk the perpetrator(s) poses and will continue to pose to other children, their own unmet needs, the severity of the abuse and the causes of it. Disciplinary action may be appropriate, including (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of his or her behaviour; (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and (c) to ensure the safety and wellbeing of the victim and other children in the College. A pupil against whom an

allegation of abuse has been made may be suspended from the College as a neutral measure during the investigation. The College will carry out risk assessments and take all appropriate action to ensure the safety and welfare and continued education of all pupils including the pupil or pupils accused of abuse.

All those involved in such allegations will be treated as being at risk and in need of support. The College will provide on-going support including by (a) ensuring their immediate safety; (b) responding promptly and appropriately to the abuse; (c) assessing and addressing any unmet needs; (d) following the procedures set out in this Safeguarding Policy (including where the child is in need of early help or statutory intervention); (e) monitoring the child's well-being closely and ensuring that s/he receives on-going support from all relevant staff members within the College; (f) engaging with the child's parents and any external agencies to ensure that the child's needs are met in the long-term consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring.

This may include, for example: gender and equalities work, work around College safety, security and supervision, awareness raising for staff, students and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

5.9 How does the College raise awareness of, and reduce the risk, of child on child abuse?

Staff are trained on the nature, prevalence and effect of child on child abuse, how to prevent, identify and respond to it. The College actively seeks to prevent all forms of child on child abuse by educating students and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the College community, and responding to all cases of child on child abuse and any cases of bullying (no matter how trivial) promptly and appropriately.

The College has robust anti-bullying procedures in place. Children are educated about the nature and prevalence of child on child abuse via PSHE, they are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator. They are regularly informed about the College's approach to such issues, including its zero tolerance policy towards all forms of bullying and child on child abuse.

Risk assessments are carried out and kept under review. Appropriate action is taken to protect pupils identified as being at risk including risks arising from behaviour on residentials and the particular vulnerabilities of those with a special educational need or disability.

6 Sexual Violence and Sexual Harassment between Children

Child on child abuse can include two specific forms, known as Sexual Violence and Sexual Harassment. Any response to these should fall within, and be consistent with, the College's wider approach to peer-on-peer abuse (see above).

Sexual Violence includes sexual offences which fall under the Sexual Offences Act 2003 in the UK and the Spanish Criminal Code 2023. Sexual Harassment refers to 'unwanted conduct of a sexual nature'. This can occur online (including, but not limited to non-consensual sharing of images, making sexual comments on social media) and offline (including but not limited to making sexual comments, sexual taunting or 'jokes', and physical contact, for example, brushing against someone deliberately or interfering with their clothes).

Sexual Violence and Sexual Harassment can:

- occur between any two children, or a group of children against one individual or group
- be perpetrated by a child of any age against a child of any age
- be perpetrated by a child of any sexual orientation against a child of any sexual orientation
- include behaviours that exist on an often progressive continuum and may overlap
- be online and offline (physical or verbal)

Children with Special Educational Needs (SEN) are more vulnerable, and there may be barriers in recognising abuse in this group of children. In addition, children who are perceived by their peers to be LGBT or identify themselves as LGBT may be more vulnerable.

Keeping Children Safe in Education (2023) provides best practice information about what sexual violence and sexual harassment is, how to minimise the risk of it occurring, and what to do when incidents occur, or are alleged to have occurred. The DfE advice highlights best practice and cross-references other advice, statutory guidance and the legal framework.

The College will apply the principles set out in it when considering their approach to sexual violence and sexual harassment between children. The above guidance

- stresses the importance of making it clear that sexual violence and sexual harassment are not acceptable, will never be tolerated, and are not an inevitable part of growing up
- highlights the risks of tolerating or dismissing any forms of sexual violence or sexual harassment, and encourages early intervention to avoid potential escalation;
- advises on how to embed training and education on these issues within a strong pastoral system, and a planned taught programme across the whole curriculum
- encourages forums that enable children to talk about issues openly
- includes a list of possible topics that any taught programme could cover - including consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships;
- advises on how to manage a disclosure, either from the child who has suffered abuse or from other children;
- provides guidance on when to carry out a risk and needs assessment for children affected by sexual violence or sexual harassment;
- provides guidance on initial considerations which Colleges should take into account when faced with a concern or allegation of sexual violence or sexual harassment - including the age and developmental stages of the children, and any power imbalance between them;
- provides guidance on difficult scenarios which Colleges might encounter, for example: - how to handle an incident between two pupils which is alleged to have taken place away from College premises

Contextual safeguarding

Safeguarding incidents and / or behaviours can be associated with factors outside the College and / or can occur between children outside the College.

All staff, including the DSL, should consider the context within which such incidents and / or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and / or welfare.

Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.

7 Stages of child protection

The College can use a range of arrangements depending on the information available. The College will always work cooperatively with external agencies, including the local authority and the police.

7.1 Early Help

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. The College understands that providing early help is more effective in promoting the welfare of children than reacting later.

If early help is appropriate, the DSL or DDSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to Children's Social Care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse. Any child may benefit from early help, but all College staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is a privately fostered child.

7.2 Children in Need

A Child in Need is defined under the UK Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. A child who is deemed to be a Child in Need will have been assessed using best practice guidance from the UK.

7.3 Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation. Should an investigation occur, then the College's involvement and any action may be determined on the advice given by the investigating agency.

7.4 What to do if you have a concern about a child

This section should be read alongside Keeping Children Safe in Education (2023) – Part One and Annex A. If staff have any concern about a pupil's welfare, action should be taken immediately.

- **If in doubt or you have any concerns about the safety and welfare of a child report a concern on the MyConcern system.**
- **Discuss the content of the concern with the DSL, Executive Headteacher or Deputy DSL.**
- **If the concern involved an allegation against staff, this must be reported directly to the Executive Headteacher and in accordance with the procedures set out in section 18 below.**

Maintain confidentiality

Safeguarding and promoting the welfare of children is everyone's responsibility (KCSIE 2023). All staff should know what to do when a child discloses abuse to them, they have concerns about a child's welfare, or when children or staff raise concerns about a pupil to them.

If a child tells a member of staff that they know about or have been a victim of abuse or neglect the member of staff should:

- Listen carefully and allow the child to speak freely and remain calm. Do not interrupt the child or be afraid of silences.
- Provide reassuring nods and words such as, "I am so sorry this has happened", "You are doing the right thing in talking to me". Avoid saying things like, "I wish you had told me about this earlier" or "I cannot believe what I am hearing".
- Questioning of the child about what they are saying should not be extensive as partner agencies will lead any investigation. Limit questioning to the minimum necessary for clarification using What, When, How and Where but avoid leading questions such as, "Has this happened to your siblings?" Do not use questions beginning with Why as this can apportion feelings of guilt within a child.
- If the child discloses abuse, then it is appropriate to ask whether any other adults were present and observed the abuse and whether the abuse has happened before
- At an appropriate time tell the child that the matter will be referred in confidence. Do not promise confidentiality.
- Tell the child what will happen next. The child may want to accompany you to see the DSL, otherwise let the child know that someone will come to see them before the end of the day.

Receiving a report of harmful sexual behaviour

Additional guidance about how to manage a report of harmful sexual behaviour is provided in Part 5 KCSIE. This includes the following advice:

- Only record the facts as the child presents them.
- **Where the report includes an online element, do not view or forward illegal images of a child. See paragraph the UK Council for Child Internet Safety's advice note [Sexting in Colleges and colleges: responding to incidents and safeguarding young people \(August 2016\)](#) for advice about what to do when viewing an image is unavoidable.**
- Manage reports with another member of staff present (preferably the DSL, Executive Headteacher or DDSL), if possible.
- Inform the DSL as soon as practically possible if the DSL is not involved in the initial report.

Use of reasonable force

There are circumstances when it would be appropriate for staff to use reasonable force to safeguard pupils. 'Reasonable' in these circumstances means using no more force than is needed.

Staff should refer to the [College's behaviour policy](#) and the [staff code of conduct](#) for more detailed guidance about the use of reasonable force.

7.4.1 Recording

Staff should Report the concern on MyConcern, using a body map if needed. Staff should use the specific words that the child used (e.g. if referring to parents of their body), indicating these by using “speech marks/inverted commas”.

If a disclosure of abuse has been made by the child, immediately discuss the concerns verbally with the DSL, Deputy DSL or Executive Headteacher prior to writing up the record. The DSL or Executive Headteacher should always be available to discuss safeguarding concerns and may be contacted on their mobile phones in relation to any safeguarding concerns out of College hours.

If in exceptional circumstances the DSL is not available then this should not delay appropriate action being taken and staff should speak to the Executive Headteacher, DDSL or, failing that, a member of the SLT. All documents should be kept in a secure location with restricted access.

Where a child is suffering, or is likely to suffer from harm, a referral to children's social care and/or police should be made immediately. Staff should be aware of the process for making referrals direct to children's social care and / or the police in these circumstances. See below for details on making a referral.

Any action should be shared with the DSL, Executive Headteacher, DDSL, or a member of the senior leadership team, as soon as is practically possible.

Action by the DSL:

On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the best practice procedures and referral threshold document. Such action may include:

- managing any support for the pupil internally via the College's own pastoral support processes, seeking advice from children's social care where required;
- an early help assessments; or
- a referral for statutory services.

The views of the child will be taken into account when considering the appropriate course of action but will not be determinative.

Where the concern relates to the welfare of a pupil who is aged 18 or over, the DSL will consider whether it is necessary to refer such concerns to the police rather than, or in addition to, children's social care.

If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving.

Managing support for pupils internally

The College has a framework for the identification, assessment, management and review of risk to pupil welfare so that appropriate action can be taken to reduce the risks identified.

7.4.2 Making referrals to statutory agencies

If a child is thought to be at risk of harm

When a child is thought to be at risk of harm or is likely to be at risk of harm (see above), then a referral should be made immediately to Children's Social Care or the police if a criminal act is thought to have occurred. Whilst it is the role of the DSL, any member of staff can make a referral to Children's Social Care or the police. The College does not require parental consent for referrals to be made to statutory agencies. Consent to do this must not be obtained from the parents if to gain consent would put the child's safety at risk or to do so could jeopardise any investigation by partner agencies (WTSC 2018).

If a child has unmet needs

When a child is not considered at risk of harm, but still has unmet needs that could mean that they are a Child in Need (see above), a referral should be made to Children's Social Care via the local authority process. The

College does not require parental consent for referrals to be made to statutory agencies in these circumstances, however, it is best practice that these concerns should be discussed with the parents and any subsequent referral made transparently with the parent's knowledge.

Staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:

- personal details of the child including the child's developmental needs;
- detailed information about the concern;
- information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.

If the referral is made by telephone, this should be followed up in writing. If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.

Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure that the concerns have been addressed and that the child's situation improves.

Confidentiality

Staff should never guarantee confidentiality to pupils or adults wishing to tell them about something serious as this may ultimately not be in the best interests of the child. They should guarantee that they will not tell anyone who does not have a clear need to know and that they will pass on information in confidence only to the people who must be told in order to ensure their safety.

8 Whistleblowing

All adults have a responsibility to report any concerns about poor or unsafe practice, including in relation to the care and protection of a pupil or pupils. If a member of staff believes that best practice in this area is not being adhered to or that practice may put a pupil or pupils at risk, they should:

Report any concern to the Executive Headteacher

If the concern relates to the Headteacher, they should report the concern to Elena Benito, Managing Director Spain

Please see the 'key people and contacts' page in this document for the contact details of the above people within King's Group

Concerns raised under this [Whistleblowing Policy](#) are distinct from concerns or allegations about an adult's suitability to work with or have access to children. Staff may follow the College's whistleblowing policy to raise concerns about poor or unsafe safeguarding practices at the College or potential failures by the College or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously.

No member of staff will suffer a detriment or be disciplined for raising a genuine concern about unsafe practice, provided that they do so in good faith and follow the whistleblowing procedures.

Where an adult feels unable to raise a concern about poor safeguarding practice within King's College Alicante or where they feel that their concern is not being addressed, they can raise their concern externally using either of the routes below:

- Guidance can be found at - <https://www.gov.uk/whistleblowing>
- For UK specific support the NSPCC whistleblowing helpline is available for adults who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0044 800 028 0285 – lines are available from 9:00am to 9:00pm CET, Monday to Friday, or email: help@nspcc.org.uk

9 The role of the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) is the senior member of staff responsible for leading safeguarding in the College (including online safety). The DSL must be a member of the College leadership team. The DSL takes the lead responsibility for safeguarding and child protection in the College and their job description explicitly reflects this.

The name and contact details of the DSL are set out in section 2.

9.1 Deputy DSL

The role of the Deputy DSL is to support the DSL in their safeguarding role and to carry out the activities of the DSL if the DSL is unavailable. Whilst the activities of the DSL can be delegated to DDSLs, the ultimate lead responsibility for child protection must remain with the DSL, and this lead responsibility must not be delegated. The Deputy DSLs are trained to the same level as the DSL and the duties of the Deputy DSLs are reflected explicitly in their job descriptions. It is also recommended that a number of staff, such as the College nurse, are DSL level trained.

The name and contacts details of the Deputy DSLs and others trained to DSL level are set out in section 2.

9.2 Inter-agency working

The DSL and Deputy DSLs liaise with the local authority and work in partnership with other agencies in the best interests of children in the College.

9.3 Support for DSL

The DSL is given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

There are 4 key elements to the DSL role. They will:

- Manage referrals
- Work with others
- Train
- Raise awareness

9.4 Manage referrals

The DSL is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme in the UK where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or has 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.

9.5 Work with others

The DSL is expected to:

- liaise with the Headteacher to inform him or her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (in relation to allegations against adults) and the Designated Officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, College nurses, IT technicians, and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and

- act as a source of support, advice and expertise for all staff.

9.6 Training

The DSL (and any deputies) have undertaken training to provide them with the knowledge and skills required to carry out their role, including inter-agency working. This training must be updated at least every two years. The DSL will undertake additional Prevent awareness training to the government Prevent training that all College staff undertake.

Note: The Executive Headteacher and Deputy DSLs are trained to the same level as the DSL.

In addition to the formal training set out above, the DSLs knowledge and skills will be refreshed via informal updates (for example e-bulletins, meeting other designated safeguarding leads, participating in Kings Group Safeguarding meetings or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and 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 statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- 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 or college's child protection policy and procedures, especially new and part time 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;
- understand the importance of information sharing, both within the College, and with the LSCB, other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the College or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of 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 College or college;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the College or college may put in place to protect them.

9.7 Raise awareness

The DSL should:

- ensure the College's safeguarding and child protection policies are known, understood and used appropriately;
- ensure the College's safeguarding and child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the proprietor regarding this;
- ensure the safeguarding and child protection policy is available publicly and parents are aware of the fact that referrals to children's social care or the police about suspected abuse or neglect may be made and the role of the College in this; and
- link with the local LSCB to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

9.8 Safeguarding Files

When a child leaves the College, it is the responsibility of the DSL to ensure that a copy of their safeguarding records are transferred securely and confidentially to the new College. The transfers will be carried out through MyConcern, after the Isams rollover and will be separate to the transfer of the main pupil file. Before transferring, the DSL will arrange a telephone call with the DSL or Headteacher in the receiving College.

The DSL will obtain confirmation of receipt. Receiving Colleges should ensure key staff, such as DSLs and SENCOs, are aware as required.

In addition to the Safeguarding File, the DSL should also consider if it would be appropriate to share any information with the new College in advance of a child leaving. For example, information that would allow the new College to continue supporting victims of abuse and have that support in place for when the child arrives. This should be done with the parent's consent unless to do so would place a child or parent at heightened risk.

On receiving a child protection file, the DSL will ensure that key staff are aware as required, including the SENCO / named person with oversight for SEN.

9.9 Availability

During term time the DSL (or a deputy) will always be available (during College hours) for staff in the College to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) will normally be available in person, the Executive Headteacher will define what "available" means and whether in exceptional circumstances availability via phone and/or Skype or other such media is acceptable. It is the responsibility of the DSL to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

10 Responsibilities of the proprietor

Inspired Education Group is the proprietor of the College. As proprietor, Inspired will comply with all duties under legislation and will always take into account statutory guidance, ensuring that all policies, procedures and training are effective and comply with the law at the time.

It is the responsibility of the proprietor to:

- Ensure that all staff read a least Part One of Keeping Children Safe in Education
- Staff working with children will also read KCSIE Annex A
- Ensure that all staff follow the requirements of this Safeguarding and Child Protection Policy and Procedure
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities, as set out in Part One of Keeping Children Safe in Education
- Designate a senior board member to take leadership responsibility for safeguarding arrangements, this is Elena Benito King's Group CEO.
- Ensure that all safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency procedures set up by the LCSB
- Ensure that appropriate policies and procedures are in place in order for appropriate action to be taken in a timely manner to safeguarding and promote children's welfare
- Ensure that each College works in line with local inter-agency procedures
- Ensure that the Safeguarding Policy is updated annually and made available via the College website
- Provide a Staff Code of Conduct and Acceptable Use Policy
- Ensure that all responsibilities regarding Children Missing from Education are followed
- Instruct Colleges to hold more than one contact number for each child, where possible
- Ensure that Colleges report to their local authority the removal of a child from the College roll in line with statutory and local authority guidance
- Ensure that all staff undergo safeguarding and child protection training (including online safety) at induction
- Recognise the expertise staff build by undertaking safeguarding training and managing concerns on a daily basis
- Ensure that appropriate filters and monitoring systems are in place to keep children safe online
- Ensure that children are taught about safeguarding, including online safety

The proprietor ensures that an annual review of safeguarding arrangements is conducted. This includes a written report which is presented to the King's Group Board. See 'Monitoring and review' section below for further information.

Members of the proprietorial team working in a governance and oversight role (e.g. GDE) will undertake DSL level training, induction and training

11 Induction

At the point of induction, all staff will be provided with, will read and will be trained in:

- Keeping Children Safe in Education 2023 – Part One and Annex A
- The Safeguarding and Child Protection Policy and Procedure, including whistleblowing
- Staff Code of Conduct and Acceptable Use of IT Policy (including staff/pupil relationships and communications)
- Digital Safety Policy (including use of social media)
- Missing Child Policy
- Behaviour Policy
- Whistleblowing policy
- Safeguarding training in accordance with best practice procedures including guidance on managing a report of peer-on-peer harmful sexual behaviour.

At the point of induction, new staff will be informed of the names, role and contact details of the Designated Safeguarding Lead and Deputies.

12 Training

12.1 Staff employed in College

All staff including the Executive Headteacher will receive a copy of this policy and Part 1 and where appropriate, Annex A of KCSIE, and will be required to confirm that they have read and understand these.

All staff employed in College should receive annual safeguarding and child protection training, usually at the commencement of the academic year. Staff should also receive safeguarding and child protection updates regularly throughout the year, provided by the DSL, in order to provide them with relevant skills and knowledge to safeguard children effectively, for example, learning about the topics in Annex A (KSCIE 2023).

Staff development training will also include training on online safety, searching pupils for prohibited and banned items, and Prevent duty training assessed as appropriate for them by the College.

Additionally, the College will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, harmful sexual behaviour, child sexual exploitation, female genital mutilation, cyberbullying and mental health and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

The College has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant knowledge, skills and experience to safeguard children effectively, including questionnaires, staff meetings, and professional development reviews. This includes information on how staff can report concerns occurring out of hours/out of term time.

12.2 Third-party contractors

It is good practice for those employed as third-party contractors who work regularly in College with opportunity for contact with pupils to have basic safeguarding training at a level appropriate to their role.

If the College your receives an allegation relating to an incident where an individual or organisation was using the College's school premises for running an activity for children, all local College safeguarding practices will be followed.

12.3 Teaching about safeguarding

The College is committed to proactively teaching children about safeguarding, including online safety, as part of our approach to offering a broad and balanced curriculum. Through ongoing work with the children, we aim to build resilience so that every child knows that we are a 'telling College' and that speaking up about any concern is valued and actively promoted. This includes raising a concern about themselves or about another.

Pupils are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through PSHE education appropriate to their age and stage of development.

The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities. The College has appropriate filters and monitoring systems in place (see the [• online safety policy]) and is mindful that this should not lead to unnecessary restrictions on learning.

Safeguarding is also taught in the following way:

Relationships education in Primary:

Our approach to this is to teach children about healthy relationships in a variety of ways. It is explicitly taught as part of our Personal, Social, Personal and Health Education (PSHE) and also through day to day conversations, assemblies and in other lessons.

Sex and Relationships education (SRE) is taught in Secondary:

Our approach to this is through our Personal, Social, Health and Economic Education curriculum. We actively promote the view that children should feel able to raise any concerns that they may have. This includes when they have a concern about a friend or peer. We take the following measures to ensure that children know how to raise a concern: through assemblies, advisory and form classes, through discussion in lessons and through references in student surveys.

13 Online safety

All staff should be aware of the risks posed to children by technology and the internet and should understand their role in preventing, identifying and responding to harm caused by its use.

All staff should be familiar with the College's E- Safety Policy, which sets out the College's approach to online safety in further detail, as well as the College's Youth Produced Sexual Imagery Policy.

13.1 Youth produced sexual imagery/'Sexting'

Whilst many professionals refer to the issue as 'sexting', there is no clear definition of 'sexting'. According to research, many professionals consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the internet.

Yet, recent NSPCC research has revealed that when children are asked 'What does sexting mean to you?' they are more likely to interpret sexting as 'writing and sharing explicit messages with people they know. Similarly, a recent ChildLine survey has revealed that many parents think of sexting as flirty or sexual text messages, rather than images.

This policy only covers the sharing of sexual imagery by children. Possessing, creating, sharing and distributing sexual photos and videos of under-18s is illegal, and therefore causes the greatest complexity for Colleges (amongst other agencies) when responding. It also presents a range of risks which need careful management. On this basis, this policy introduces the phrase 'youth produced sexual imagery' and uses this instead of 'sexting'.

This is to ensure clarity about the issues this advice addresses.

13.2 What is youth produced sexual imagery?

'Youth produced sexual imagery' best describes the practice because:

- 'Youth produced' includes children sharing images that they, or another child, have created of themselves.
- 'Sexual' is clearer than 'indecent'. A judgement of whether something is 'decent' is both a value judgement and dependent on context.
- 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the policy).

13.3 What types of incidents are covered by this policy?

Yes:

- A child creates and shares sexual imagery of themselves with a peer (also under the age of 18)
- A child shares sexual imagery created by another child with a peer (also under the age of 18) or an adult
- A child is in possession of sexual imagery created by another child

No:

- The sharing of sexual imagery of children by adults as this constitutes child sexual abuse and the College should always inform the police
- Children sharing adult pornography or exchanging sexual texts which do not contain imagery
- Sexual imagery downloaded from the internet by a child
- Sexual imagery downloaded from the internet by a child and shared with a peer (also under the age of 18) or an adult

13.4 Disclosure

All members of staff (including non-teaching staff) should be aware of how to recognise and refer any disclosure of incidents involving youth produced sexual imagery. This will be covered within staff training. Disclosure about youth produced sexual imagery can happen in a variety of ways. The child affected may inform a class teacher, the DSL in College, or any member of the College staff. They may report through an existing reporting structure, or a friend or parent may inform someone in College or colleague, or inform the police directly. Any direct disclosure by a child should be taken very seriously. A child who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in College is a last resort and they may have already tried to resolve the issue themselves.

13.5 Handling incidents

All incidents involving youth produced sexual imagery should be responded to in line with this policy. When an incident involving youth produced sexual imagery comes to a member of staff's attention:

- The incident should be referred to the DSL as soon as possible
- The DSL should hold an initial review meeting with appropriate College staff

Members of staff should not view sexual imagery which is reported to them, or copy, print or share the images under any circumstances. In referring any incident of sexting, members of staff should describe the content of the images as reported to them.

Where viewing an image is unavoidable:

- viewing should take place on College premises wherever possible;
- the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);
- a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;
- full details of the viewing must be recorded in the College's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;
- any member of staff who views an indecent image should be given appropriate support.

If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.

The DSL will follow the procedures and guidance set out in 'Sexting in Colleges and colleges: responding to incidents and safeguarding young people'

- There should be interviews with the children involved (if appropriate)
- Parents of each child should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at greater risk of harm and jeopardise any police/social care investigation
- At any point in the process, if there is a concern a child has been harmed or is at risk of harm, a referral should be made to Children's Social Care and/or the police immediately

The [Youth Produced Sexual Imagery Policy](#) sets out further information about the procedures that will be followed should an incident of sexting take place.

14 Host families

(please refer to Annex E KCSIE)

15 Use of mobile technology

The College's policy on the use of mobile technology, including phones and cameras, in the College, is as follows:

- the College's acceptable use policy for pupils sets out the expectations on pupils. In the EYFS setting, pupils are not permitted to bring mobile phones or any mobile device with a camera facility onto the premises;
- all staff (including staff in the EYFS setting) should use mobile devices and cameras in accordance with the guidance set out in the staff code of conduct;
- parents of all pupils (including parents of pupils in the EYFS setting) may bring mobile devices onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

The College's approach to online safety is set out in the College's [Online Safety Policy](#).

16 Low level concerns

The safety and wellbeing of children in our College is dependent on the vigilance of all our staff and their prompt communication to the Executive Headteacher of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children. All references in this section to "adult" should be interpreted as meaning any adult (defined above) and any visitor, unless otherwise stated. The College is committed to its duty of care to pupils and will always act, including if alerted to the possibility of abuse arising from situations or persons outside the College setting.

The notification and prompt handling of all concerns about adults is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

We are a 'telling' organisation. If you are concerned about the behaviour or actions of any adult...speak to the Executive Headteacher

16.1 Code of Conduct

All staff must behave responsibly and professionally in all dealings with children and specifically with pupils for whom they have a duty of care. All staff must follow the procedures set out in our 'Staff Code of Conduct including Acceptable Use Policy'. Staff should always avoid behaviour which might be misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence for a person aged 18 or over and in a position of trust to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. A position of trust could arise even if the member of staff does not teach the child.

16.2 Our low-level concern policy

The overarching aim of the College's Low-Level Concern Policy is to facilitate a culture in which the clear values and expected behaviours which are set out in our Code of Conduct are lived, constantly monitored, and reinforced by all staff. In particular, the intention of this policy is to:

- maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines;
- ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Code of Conduct; and
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

16.3 What is a low-level concern?

A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that an adult may have acted in a manner inconsistent with the College's Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour particularly towards or around children.

16.4 Low-Level Concerns about self (self-reporting)

From time to time an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the College sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

16.5 Low-level concerns about an adult

From time to time an individual may notice behaviour or actions in others which leave them concerned. These are behaviour or actions which fall short of a formal allegation of abuse. These tend to be behaviours which indicate that our Code of Conduct has not been met. Any such concerns can be dealt with as a Low-Level Concern.

16.6 What should I do if I have one?

Where a low-level concern exists it should be reported to the Executive Headteacher as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident).

16.7 How will my low-level concern be handled?

The DSL will discuss all low level concerns s/he receives with the Executive Headteacher as soon as possible and in any event within 24 hours of becoming aware of it. The Executive Headteacher will, in the first instance, satisfy him/herself that it is a low-level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure (outlined later in this document). The circumstances in which a low-level concern might be reclassified as an allegation are where:

- a) the threshold is met for an allegation
- b) there is a pattern of low-level concerns which collectively amount to an allegation or
- c) there is other information which when taken into account leads to an allegation.

Where the Executive Headteacher is in any doubt whatsoever, advice will be sought from the DSL, if necessary on a no-names basis. Having established that the concern is low-level or Executive Headteacher (at the Executive Headteacher's discretion) will discuss it with the individual who has raised it and will take any other

steps to investigate it as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc.

16.8 What records will be kept?

Where a low-level concern has been communicated, a confidential record will be kept in a central file which logs all low-level concerns. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- a) the concern (or group of concerns) has been reclassified as an allegation as above; or
- b) the concern (or group of concerns) is sufficiently serious to result in formal action under the College's grievance, capability or disciplinary procedure.

17 Allegations of abuse made against teachers and other staff

The purpose of this section of the policy is to outline how allegations against adults will be handled. Allegations will always be dealt with in accordance with statutory guidance provided in Keeping Children Safe in Education.

17.1 What is an allegation?

Allegations represent situations that might indicate a person would pose a risk of harm to children if they continue to work in regular or close contact with children in their present position, or in any capacity. This procedure applies to all adults in the College if it is alleged that they have:

- 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; or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.

An allegation may be triggered by one specific incident or by a pattern of behaviour by the adult, or low-level concerns which when considered collectively amount to an allegation.

17.2 What should I do if I have an allegation?

Allegations about staff or volunteers, including the DSL, should be reported to the Executive Headteacher immediately. The adult to whom the concern or allegation relates should not be informed. If the allegation is about the Executive Headteacher, it must be referred to Inspired's Managing Director of Spain immediately, without informing the Executive Headteacher.

17.3 Duties as an employer and an employee

This policy relates to members of staff and volunteers who are currently working in any College, regardless of whether the College is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

King's Group has a duty of care to all employees. King's Group will provide effective support for anyone facing an allegation in accordance with Part 4 of Keeping Children Safe in Education and the College's employment procedures. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time, supports the person who is the subject of the allegation.

17.4 Dealing with an allegation

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority Children's Social Care services. In these cases, local arrangements will be followed to resolve cases without delay. Some rare allegations will be so serious they require immediate intervention by Children's Social Care services and/or the police.

The Executive Headteacher or Managing Director, Spain, ("Case Manager") will not undertake any investigation before first speaking to the Safeguarding Governor. The Executive Headteacher (or Managing Director Spain, where there is an allegation against the Executive Headteacher) will inform the Safeguarding Governor

immediately and in any event within one working day of all allegations that come to the College's attention and appear to meet the criteria set out above. Where appropriate, the case manager will also consult the DSL.

After notifying the Safeguarding Governor and, where appropriate, DSL, the Executive Headteacher must notify the Managing Director, Spain, of the allegation and the action taken.

Disclosure of information

The Case Manager will inform the accused person of the allegation as soon as possible after the Safeguarding Governor has been consulted.

The parents or carers of the child / children involved will be informed of the allegation as soon as possible if they do not already know of it. They may also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

Where a strategy discussion is needed, or police or Children's Social Care services need to be involved, the case manager (College) will not inform the accused person until those agencies have been consulted, and have agreed what information can be disclosed to the accused.

The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

Where it is clear that an investigation by the police or Children's Social Care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the Safeguarding Governor will discuss the next steps with the case manager. In those circumstances, the options open to the College depend on the nature and circumstances of the allegation and the evidence and information available and action may be taken in accordance with the College's employment procedures.

17.5 Further action to be taken by the College

King's Group has a duty of care to their employees. King's Group will act to manage and minimise the stress inherent in the allegations process. Providing effective support for the accused individual is vital to fulfilling this duty. Action will be taken in accordance with Part 4 of KCSIE and the College's employment procedures.

Where a member of boarding staff is suspended pending an investigation of a child protection nature, arrangements for alternative accommodation away from children will be made for the member of staff.

17.6 Oversight and monitoring

The Executive Headteacher has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the local authorities the subject. The Executive Headteacher will provide advice and guidance to the case manager, in addition to liaising with the police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

17.7 Outcome of an allegation

The following definitions will be used when determining the outcome of allegation investigations:

- Substantiated: there is sufficient evidence to prove the allegation;
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

17.8.Ceasing to use staff

If the College ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services because they are unsuitable to work with children, a settlement agreement will not be used and King's Group will promptly refer the case to the DBS for consideration of whether inclusion on the barred lists is required if the criteria for referral are met. The College may also need to consider a referral to the DBS if a member of staff is suspended, or deployed to another area of work that is not regulated activity.

If a member of staff tenders his or her resignation, or ceases to provide his or her services at a time when child protection concerns exist in relation to that person, those concerns will still be followed up by the College in accordance with this policy and a referral to the DBS will be made promptly if the criteria for referral are met.

In the case of a member of teaching staff at a College, separate consideration will be given as to whether the matter should be referred to the Teaching Regulation Agency (TRA) where a teacher has been dismissed, or would have been dismissed had he / she not resigned, because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence. An interim referral to the TRA may also be considered and made if appropriate.

17.9 Malicious or unsubstantiated allegations

If an allegation is determined to be unsubstantiated or malicious, the DSL will refer the matter to the Children's Social Care services to determine whether the child concerned is in need of services, or may have been abused by someone else.

If an allegation is shown to be deliberately invented or malicious, the Executive Headteacher and Managing Director, Spain, will consider whether any disciplinary action is appropriate against the pupil who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she were not a pupil.

Where a parent has made a deliberately invented or malicious allegation the Executive Headteacher will consider whether to require that parent to withdraw their child or children from the College on the basis that they have treated the College or a member of staff unreasonably.

17.10 Learning lessons

At the conclusion of a case in which an allegation is substantiated, the DSL will review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the College or college's procedures or practice to help prevent similar events in the future, with a report being presented to the proprietor without delay.

17.11 Record keeping

Details of allegations that are found to have been malicious will be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The College will retain all safeguarding records and relevant personnel records for as long as reasonably required. The Information Commissioner has published guidance on employment records in its Employment Practices Code and supplementary guidance, which also provides some practical advice on record retention.

17.12 References

Cases in which an allegation was proven to be false, unsubstantiated or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference. See KCSIE 2023 for further information on references.

18 Risk assessment

Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

The format of risk assessment may vary and may be included as part of the College's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the College's approach to promoting pupil welfare will be systematic and pupil focused.

The Executive Headteacher has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.

Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

19 Monitoring and review

The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the Executive Headteacher as necessary and seeking contributions from staff. The DSL will update the Executive Leadership Team regularly on the operation of the College's safeguarding arrangements.

Any safeguarding incidents at the College will be followed by a review of these procedures by the DSL and a report made to the Executive Headteacher. Where an incident involves a member of staff, the Safeguarding Governor will be asked to assist in this review to determine whether any improvements can be made to the College's procedures. Any deficiencies or weaknesses in regard to safeguarding arrangements at any time will be remedied without delay.

The Governing Body will undertake an annual review of this policy and the College's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working.

The DSL will work with the Safeguarding Governor, preparing a termly written report commissioned by the Inspired Board. The written report should address how the College ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the College and how these have been handled; and the contribution the College is making to multi-agency working in individual cases or local discussions on safeguarding matters. The Inspired Board should also consider independent corroboration, such as:

- inspection of records or feedback from external agencies including the Designated Officer(s);
- reports of BSO inspections;
- the outcome of any relevant parental complaints; and
- press reports.

The Inspired Board will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy its final approval. Detailed minutes recording the review by the Inspired Board will be made.

20 Record keeping

20.1 General practices

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The records created in accordance with this policy may contain personal data. The College has a number of privacy notices which explain how the College will use personal data for the benefit of pupils and parents. The privacy notices are published on the College's website. In addition, staff must ensure that they follow the College's data protection policies and procedures when handling personal data created in connection with this policy.

All records created in accordance with this policy are managed in accordance with the College's policies that apply to the retention and destruction of records.

20.2 Sharing of information

As part of our admissions policy all families provide written consent that their child's previous school will be contacted as part of safeguarding checks.

Sharing of safeguarding information with future schools for leavers requires the written consent of the parents of the child. The exception to this rule is, in line with GDPR regulations, that if the sharing of information is in order to prevent or protect the child from abuse. If the sharing of information is to prevent abuse, parental consent is not required.