

1. PURPOSE

1.1 The purpose of this Policy is to ensure that:

- (a) Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- (a) All colleagues are aware of their statutory responsibilities with respect to safeguarding
- (b) Colleagues are properly trained in recognising and reporting safeguarding issues

2. SCOPE

2.1 Safeguarding and child protection is everyone's responsibility. Therefore, this Policy applies to all Indie Education (**Indie**) employees (including full time, part time, permanent, fixed term and casual), contractors, volunteers, members of the governing Board of Trustees, and any other associated persons or entities. The information and requirements within are also consistent with the procedures of our Safeguarding Partners and are applicable to extended Indie college sites, as well as, any off-site activities where learners are involved.

3. DEFINITIONS

3.1 In this Policy, the following definitions apply unless the context otherwise requires:

- (a) **Colleague or Colleagues** – used widely to include anyone working in or on behalf of Indie Education as an employee, contractor, volunteer, member of the Board of Trustees, and any other associated person or entity.
- (b) **Child or Children** – includes anyone under the age of 18, referred to throughout policy documents outside of this one, as learners.
- (c) **Headteacher** – refers to the most senior leader of the institution, typically responsible for the overall management and direction of the college. In all instances, unless stated otherwise, the CEO will act in the capacity of Headteacher across all Indie college sites.
- (d) **Safeguarding Partners** – are required to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs. They are identified in *Keeping Children Safe in Education* (and defined in the *Children Act 2004*, as amended by *Chapter 2 of the Children and Social Work Act 2017*).
 - Indie's Safeguarding Partners are:
 - a. The Local Authority (LA),
 - b. Integrated Care Boards (ICB) - previously known as Clinical Commissioning Groups
 - c. Chief Officer of Police within the LA area.
- (e) **Governing Body or Board of Trustees** – a group of individuals who are responsible for the governance of an organisation.
- (f) **Safeguarding the Welfare of Children** means:

- i. Providing help and support to meet the needs of children as soon as problems emerge
 - ii. Protecting children from maltreatment whether that is within or outside the home, including online
 - iii. Preventing impairment of children's mental and physical health or development
 - iv. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - v. Taking action to enable all children to have the best outcomes
- (g) **Child Protection** – refers to activities that are undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.
- (h) **Abuse** – is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix A explains the different types of abuse.
- (i) **Neglect** – is a form of abuse and 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. Appendix A defines neglect in more detail.
- (j) **Sharing of Nudes and Semi-Nudes** (sexting or youth-produced sexual imagery) – is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.
- (k) **Victim** – is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- (l) **Perpetrator or Alleged Perpetrator** – are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.
- (m) **Regulated Activity** means a person who will be:
- i. Responsible, on a regular basis in a college for teaching, training, instructing, caring for or supervising children; or
 - ii. Carrying out paid, or unsupervised unpaid, work regularly in a college where that work provides an opportunity for contact with children; or
 - iii. Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

4. EQUALITY STATEMENT

- 4.1 Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.
- 4.2 We give special consideration to children who:
- (a) Have special educational needs and/or disabilities (SEND) or health conditions
 - (b) Are young carers
 - (c) May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
 - (d) Have English as an additional language (EAL)
 - (e) Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
 - (f) Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
 - (g) Are asylum seekers
 - (h) Are at risk due to either their own or a family member's mental health needs
 - (i) Are looked after or previously looked after
 - (j) Are missing or absent from education for prolonged periods and/or repeat occasions
 - (k) Whose parent/carers has expressed an intention to remove them from college to be home educated

5. ROLES AND RESPONSIBILITIES

- 5.1 The college plays a crucial role in preventative education. This is in the context of a whole-college approach to preparing learners for life in modern Britain, and a culture of zero tolerance of sexism, misogyny or misandry, homophobia, biphobia, transphobia and sexual violence or harassment. This will be underpinned by our:
- (a) Behaviour policy
 - (b) Pastoral support system
 - (c) Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - i. Healthy and respectful r
 - i. patronships
 - ii. Boundaries and consent
 - ii. Stereotyping, prejudice and equality
 - iii. Body confidence and self-esteem

- iii. How to recognise an abusive relationship (including coercive and controlling behaviour)
- iv. The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
- v. What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.2 Colleagues

5.2.1 Indie Education ensures learners are supervised at all times through appropriate deployment of colleagues, including during lessons, breaks, and off-site activities. Supervision levels reflect learner needs and allow for safe emergency response.

5.2.2 All colleagues will:

- (a) Read and understand *Part 1 and Annex B of the Department for Education's Statutory Safeguarding Guidance, Keeping Children Safe in Education*, and review this guidance annually.
- (b) Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- (c) Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- (d) Provide a safe space for learners who are LGBTQ+ to speak out and share their concerns

5.2.3 All colleagues must be aware of:

- (a) How our safeguarding systems encompass various elements, including this Policy, our Code of Conduct, the roles and identities of the Designated Safeguarding Lead (DSL) and Deputies, the Behaviour Policy, the Online Safety Policy, and our response to children who go missing from education.
- (b) The Early Help Assessment Process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- (c) The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- (d) What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- (e) The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is

frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

- (f) New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- (b) The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- (c) The fact that children can be at risk of harm inside and outside of their home, at college and online
- (d) The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- (e) That a child and their family may be experiencing multiple needs at the same time
- (g) What to look for to identify children who need help or protection
 - Appendix D of this policy outlines in more detail how colleagues are supported to do this.

5.3 Designated Safeguarding Lead (DSL)

5.3.1 The DSL will:

- (a) Take lead responsibility for child protection and wider safeguarding in the college, including online safety, as well as, filtering and monitoring processes on college devices and college networks to keep learners safe online.
- (b) Be available, during the term, at college hours for colleagues to discuss any safeguarding concerns.
- (c) Be contactable out of college hours by email and phone, where necessary. If the DSL and deputy are not available, Ryan Seal will act as cover (for example, during out-of-hours/out-of-term activities).
- (d) Be given the time, funding, training, resources and support to:
 - i. Provide advice and support to other colleagues on child welfare and child protection matters
 - ii. Take part in strategy discussions, as well as inter-agency meetings and/or support other colleagues to do so
 - iii. Contribute to the assessment of children
 - iv. Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support colleagues who make such referrals directly
 - v. Have a good understanding of harmful sexual behaviour
 - vi. Have a good understanding of the filtering and monitoring systems and processes in

place at our college

- vii. Make sure that colleagues have appropriate Prevent training and induction
- viii. Keep the college leaders informed of any issues
- ix. Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- x. Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care workers to prepare the college's policies
- xi. Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- xii. Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
 - ◆ Please note that a full list of DSL responsibilities are set out in their job description.

5.3.2 The key responsible persons are:

- (a) Sara Elverson Marsh, acting as the primary DSL.
- (b) Shaun Denigan, acting as Deputy DSL where the DSL is absent or unavailable.
- (c) Ryan Seal, acting on behalf of the DSL and Deputy DSL where both are unavailable (for example, during out-of-hours/out-of-term activities).

5.4 **Board of Trustees**

5.4.1 Trustees will:

- (a) Facilitate a whole-organisation approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- (b) Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the CEO to account for its implementation
- (c) Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our college's local multi-agency safeguarding arrangements
- (d) Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full board of Trustees. This is our chair of Trustees, Harry Fowler and will always be a different person from the DSL
- (e) Ensure all colleagues undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- (f) Read the Keeping Children Safe in Education document in its entirety.
- (g) Seek assurance that the other body has appropriate safeguarding and child protection

policies/procedures in place, and inspect them if needed

- (h) Make sure there are arrangements for the body to liaise with the college about safeguarding arrangements, where appropriate
- (i) Make sure that safeguarding requirements are a condition of using the college premises, and that any agreement to use the premises would be terminated if the other body fails to comply
- (j) Ensure that the college has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 - ii. Making sure that the leadership team and colleagues are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - iii. Reviewing the DfE's filtering and monitoring standards, and discussing with colleagues responsible for IT and service level IT providers what needs to be done to support the college in meeting these standards
- (f) Make sure that:
 - i. The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - ii. Online safety is a running and interrelated theme within the whole-organisation, Indie approach to safeguarding and related policies
 - iii. The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
 - i. The college has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about colleagues. Appendix C of this policy covers this procedure.
 - iv. That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
 - v. Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the college roll):

5.4.2 Note that the Chair of Trustees will act as 'case manager' in the event that an allegation of abuse is made against the CEO, where appropriate (see Appendix C).

5.5 The CEO

5.5.1 The CEO is responsible for the implementation of this policy, including:

- (a) Ensuring that all colleagues:
 - i. Are informed of our systems that support safeguarding, including this policy, as part of their induction
 - ii. Understand and follow the procedures included in this policy, particularly those
- (b) Ensure our curriculum helps to educate learners about appropriate behaviour and consent

- (c) Ensure learners are able to easily and confidently report abuse using our reporting systems
- (d) Ensure colleagues reassure victims that they are being taken seriously
 - i. Be alert to reports of sexual violence and/or harassment that may point to environmental or concerning referrals of cases of suspected abuse and neglect
- (e) Communicating this policy to parents/carers when their child joins the college and via the college website
- (f) Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- (g) Acting as the 'case manager' in the event of an allegation of abuse made against another colleague, where appropriate (see Appendix C)
- (h) Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

5.6 **Virtual School Headteachers**

- (a) Virtual School Headteachers have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of learners with a social worker.
- (b) They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

6. **CONFIDENTIALITY**

6.1 Indie Education recognises that timely and appropriate information sharing is essential to effective safeguarding and promoting the welfare of children. We are committed to a culture of openness and professional curiosity, ensuring that all colleagues understand when and how information can be shared.

6.2 We follow the principles outlined in:

- (a) Working Together to Safeguard Children (2018, updated 2023)
- (b) Keeping Children Safe in Education (2024)
- (c) The Data Protection Act (2018) and UK GDPR
- (d) The Government's Information Sharing Guidance for Safeguarding Practitioners

6.3 Our key principles are as follows:

- (a) Information will be shared on a 'need to know' basis only, and where it is necessary to protect a child or prevent harm.
- (b) Fears about sharing information must not stand in the way of the need to safeguard and promote the welfare of children.
- (c) The DPA 2018 and UK GDPR do not prevent the sharing of safeguarding information. In fact, the DPA includes provisions for processing 'special category data' without consent where necessary to protect children or individuals at risk.

- (d) Where it is not possible, appropriate, or safe to gain consent (for example, if doing so may place a child at risk), information may still be shared under the lawful basis of safeguarding.

- 6.4 All colleagues are trained to:
- (a) Never promise a child complete confidentiality. Instead, they explain that information will be shared on a need-to-know basis to help keep them safe.
 - (b) Always refer safeguarding concerns to the Designated Safeguarding Lead (DSL) or Deputy DSL, who will make informed decisions about sharing information with:
 - i. Local authority children's social care
 - ii. The police
 - iii. Health professionals
 - iv. The three safeguarding partners (local authority, health, and police)
- 6.5 **Where a child discloses sexual violence or harassment**
- (a) The DSL will balance the victim's wishes with the need to protect others and the legal basis for sharing information.
 - (b) Parents/carers will normally be informed, unless doing so places the child at greater risk.
 - (c) Where a crime is reported (e.g., rape or sexual assault), this will be referred to the police.
 - (d) Anonymity and privacy of all learners involved will be protected wherever possible, especially where criminal proceedings are ongoing.
 - (e) If any colleague of Indie Education is in doubt about sharing information, they must seek advice from the DSL or deputy.
- 6.6 Confidentiality is also addressed in this policy with respect to record-keeping and allegations of abuse against colleagues in Appendix C.

7. EARLY HELP ASSESSMENT

- 7.1 At Indie Education, we recognise that early identification of emerging needs is essential to safeguarding and promoting the welfare of learners. Early help means providing support as soon as a problem emerges, at any point in a child's life, to prevent issues from escalating.
- 7.2 If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Colleagues may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.
- 7.3 We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.
- 7.4 The DSL will keep the case under constant review and the college will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

- 7.5 At Indie Education, we recognise that early identification of emerging needs is essential to safeguarding and promoting the welfare of learners. Early help means providing support as soon as a problem emerges, at any point in a child's life, to prevent issues from escalating.
- 7.6 We follow the Leicester Safeguarding Children Partnership Board (LSCPb) framework for early help. Where appropriate, we work collaboratively with families and other agencies to deliver an effective, coordinated early help response.
- 7.7 **When Early Help is Considered**
- 7.7.1 Early help may be offered to learners and families where concerns are identified such as:
- (a) Persistent absence or poor punctuality
 - (b) Mental health concerns
 - (c) Parental substance misuse, domestic abuse, or mental health issues
 - (d) Challenging behaviour
 - (e) Poor home conditions or neglect
 - (a) Concerns about identity, self-esteem, or peer relationships
- 7.8 **Early Help Process**
- 7.8.1 **Identification** – All colleagues are trained to be alert to signs that a learner or family may benefit from early help. Concerns should be reported to the DSL or Deputy DSL without delay.
- 7.8.2 **Initial Discussion** – The DSL will gather relevant information and assess whether an Early Help Assessment is appropriate. If so, consent will be sought from the learner (where appropriate) and their family.
- 7.8.3 **Completing the Assessment** – The DSL or a designated colleague will complete the Leicester City Early Help Assessment (EHA) in line with LSCPb guidance. This may involve speaking with the learner, parents/carers, and relevant professionals.
- 7.8.4 **Team Around the Family (TAF)** – If multiple services are involved, a TAF meeting will be arranged to coordinate support, agree an action plan, and assign a lead professional. Progress is regularly reviewed, and escalation will occur if concerns persist or increase.
- 7.8.5 **Accessing-Support** – Support may include referrals to:
- (a) Family support services
 - (b) Mental health or wellbeing support
 - (c) Parenting programmes
 - (d) Youth services or mentoring
 - (e) Housing or financial advice
- 7.8.6 **Escalation** – If the situation does not improve or risk increases, the DSL will make a referral to Leicester City's Children's Social Care via the Duty and Advice Service (details below).

- Duty and Advice Service – Leicester City Council
 - Phone: 0116 454 1004
 - Email (Duty and Advice Service): duty&advice@leicester.gov.uk
 - More information: <https://www.lcitylscb.org>

7.8.7 **Referral**

- (a) If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.
- (b) If you make a referral directly you must tell the DSL as soon as possible (see section .
- (c) The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome.
- (d) The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.
- (e) If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.
- (b) At Indie Education, all colleagues understand their responsibility to refer concerns about a child's welfare or safety promptly and to escalate concerns where appropriate action is not being taken to safeguard the child. We follow the Leicester Safeguarding Children Partnership Board's (LSCPB) multi-agency thresholds guidance and referral procedures.

8. **MENTAL HEALTH AND WELLBEING**

- 8.1 Mental health problems can, in some cases, be an indicator that a child has experienced or is at risk of experiencing abuse, neglect, or exploitation.
- 8.2 At Indie Education, we are committed to supporting the emotional wellbeing and mental health of all learners, and we recognise that early identification and intervention is essential.
- 8.3 All colleagues:
 - (a) Receive training to help them recognise signs of possible mental health difficulties, including changes in behaviour, emotional presentation, or social interactions.
 - (b) Are encouraged to share any concerns—however minor—with the DSL, to ensure that patterns or emerging issues are identified early.
- 8.4 Common signs may include:
 - (a) Withdrawal, low mood, anxiety or unusual tiredness
 - (b) Changes in appetite, self-care or appearance
 - (c) Decline in academic performance
 - (d) Reluctance to attend college or participate in activities
 - (e) Expressions of hopelessness or distress, including verbal disclosures

- 8.5 If a mental health concern coincides with or contributes to a safeguarding concern, colleagues must follow the safeguarding procedures set out in section 10 (referral to the DSL and potentially children's social care or the police).
- 8.6 Where a mental health concern is not immediately a safeguarding issue, colleagues must speak to the DSL. The DSL will consider the most appropriate support route, which may include:
- (a) Monitoring and in-college support from pastoral colleagues or designated wellbeing leads
 - (b) Involvement of the college counsellor or mental health champion (if available)
 - (c) Contacting the learner's GP or health visitor, with parental/carers consent
 - (d) Making a referral to external support services, such as:
 - i. CAMHS (Child and Adolescent Mental Health Services) via the local Leicester City CAMHS pathway
 - ii. Early Help services, where family or home factors are involved
 - iii. Voluntary organisations and targeted mental health charities (e.g. Young Minds, The Mix)
- 8.7 The DSL holds overall responsibility for ensuring the learner's mental health needs are understood within the safeguarding context. The DSL or designated lead will:
- (a) Maintain clear records of any concerns, decisions, and actions taken
 - (b) Lead or support Team Around the Child (TAC) or Team Around the Family (TAF) meetings where appropriate
 - (c) Ensure parents/carers are involved unless doing so would place the learner at risk

9. RECOGNISING ABUSE

- 9.1 All colleagues are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:
- (a) Is disabled
 - (b) Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
 - (c) Is a young carer
 - (d) Is bereaved
 - (e) Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
 - (f) Is frequently missing/goes missing from education, care or home
 - (g) Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
 - (h) Is at risk of being radicalised or exploited
 - (i) Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online

- (j) Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- (k) Is misusing drugs or alcohol
- (l) Is suffering from mental ill health
- (m) Has returned home to their family from care
- (n) Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- (o) Is a privately fostered child
- (p) Has a parent or carer in custody or is affected by parental offending
- (q) Is missing education, or persistently absent from college, or not in receipt of full-time education
- (r) Has experienced multiple suspensions and is at risk of, or has been permanently excluded

9.2 Colleagues must follow the procedures set out below in the event of a safeguarding issue.

9.3 Please note that, for this section and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)"

10. CONCERNS AND TAKING ACTION

10.1 Concerns for a child who is suffering, likely to suffer harm, or in immediate danger

10.1.1 Where there is concern that a child is experiencing or is at risk of significant harm (including abuse or neglect), or considered to be in immediate danger:

- (a) Make a referral to local authority children's social care and/or the police immediately, by calling 999, if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. Anyone can make a referral.
- (b) In Leicester City, referrals to children's social care should be made through the Leicester City Council's Children's Duty and Advice Service:
 - Phone (Immediate risk): 0116 454 1004
 - Out of Hours (Emergency Duty Team): 0116 255 1606
 - Email (Non-urgent enquiries): duty&advice@leicester.gov.uk
- (c) You may be asked to complete a Multi-Agency Referral Form (MARF) following a telephone discussion, particularly where a referral is being made from a professional or education setting.
- (d) Tell the DSL as soon as possible if you make a referral directly.
 - i. Please note that all referrals must be documented and logged securely on the college's safeguarding recording system.
 - ii. All referrals should follow the local safeguarding partnership's guidance as outlined by the Leicester Safeguarding Children Partnership Board (LSCPB).

- ii. Further guidance on how to report child abuse to your local council can be found here:
<https://www.gov.uk/report-child-abuse-to-local-council>

10.1.2 If at any stage:

- (a) Safeguarding concerns are not being taken seriously,
- (b) A referral has not led to appropriate action,
- (c) A child remains at risk despite previous intervention, they have a duty to escalate the matter.
 - i. Escalation may include:
 - a. Raising the issue with the CEO or Trustee designated lead for safeguarding.
 - b. Challenging decisions with children's social care using the LSCPB's Escalation and Resolution Policy.
 - c. Contacting the Local Authority Designated Officer (LADO) if concerns relate to colleagues or adults in positions of trust.
 - d. Making a referral directly to children's social care or the police if they believe a child is in immediate danger.

10.1.3 All colleagues are empowered to challenge professionally and persistently, following the principle of 'respectful uncertainty', to ensure that safeguarding remains the highest priority.

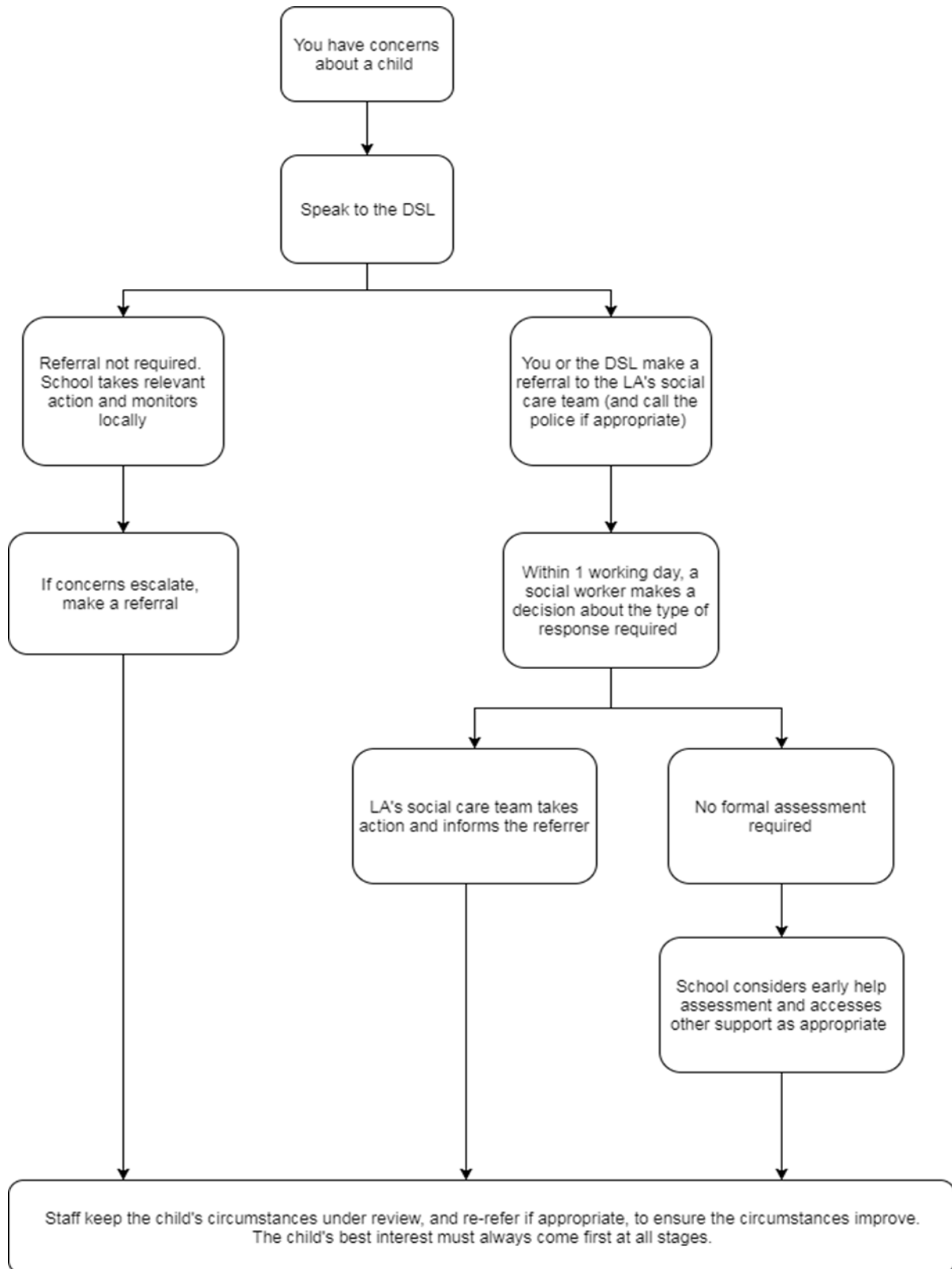
- More details on the escalation process can be found in the LSCPB Escalation Policy here:
[LSCPB Escalation Policy](#)

10.2 **Concerns for a child not suffering, likely to suffer harm, or in immediate danger**

- (c) Speak to the DSL first to agree on a course of action.
- (a) If in exceptional circumstances the DSL is not available, speak to a member of the senior leadership team and/or take advice from local authority children's social care.
 - You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.
- (d) If appropriate, make a referral to local authority children's social care directly.
- (e) Share details of any actions you take with the DSL as soon as practically possible.
 - See Figure 1 on the next page, which illustrates the procedure to follow.

Figure 1: Procedure for Concerns About a Child

Note – If the DSL is unavailable, this should not delay action. See section 10.1.1 (a) for what to do.



10.3 If a child discloses a safeguarding issue

- (a) Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- (b) Stay calm and do not show that you are shocked or upset
- (c) Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- (d) Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- (e) Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- (f) Sign and date the write-up and pass it on to the DSL.
 - Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process
- (g) Bear in mind that some children may:
 - i. Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
 - ii. Not recognise their experiences as harmful
 - iii. Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers
 - i. None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

11. FGM AND CHILDREN AT RISK

- 11.1 *Keeping Children Safe in Education* explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
- 11.2 FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
- 11.3 Possible indicators that a learner has already been subjected to FGM, and factors that suggest a learner may be at risk, are set out in section 23 of Appendix D.
- 11.4 Our safeguarding response aligns with the multi-agency statutory guidance on FGM, and any concerns must be acted on immediately.
- 11.5 Further local safeguarding guidance on FGM is available on the Leicester Safeguarding Children Partnership Board website: <https://www.lcitylscb.org>
- 11.6 **Any teacher** who:
 - (a) Is informed by a girl under 18 that an act of FGM has been carried out on her, or

- (b) Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18, and
- (c) Has no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, must:
 - i. Report the concern to the police, personally – by calling 101 – as soon as possible.
 - ii. Inform the DSL immediately after calling (unless explicitly told not to), so the DSL can make a referral to Leicester City Council's Duty and Advice Service via the details below:
 - ◆ Phone (for immediate safeguarding referrals): 0116 454 1004
 - ◆ Out of Hours Emergency Duty Team: 0116 255 1606
 - ◆ Email (non-urgent concerns): duty&advice@leicester.gov.uk
- Note that this is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. However, the duty does not apply in cases where a learner is at risk of FGM or FGM is suspected but is not known to have been carried out.
- N.B: Colleagues should not examine learners.

11.7 Any colleague who:

- (a) Discovers that an act of FGM appears to have been carried out on a learner under 18, or
- (b) Suspects a learner is at risk of FGM or suspects that FGM has been carried out or discovers that a learner aged 18 or over appears to have been a victim of FGM, must:
 - i. Speak to the Designated Safeguarding Lead (DSL) immediately.
 - a. The DSL will decide whether a referral to children's social care is required and follow local safeguarding procedures.
 - b. If the child is at immediate risk of harm, the DSL will contact the police directly on 999.

12. DEALING WITH EXTREMISM

- 12.1 For concerns relating to extremism, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the Police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.
- 12.2 The DfE also has a dedicated telephone helpline, 020 7340 7264, which college colleagues and trustees can call to raise concerns about extremism with respect to a learner. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.
- 12.3 In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
 - (a) Think someone is in immediate danger
 - (b) Think someone may be planning to travel to join an extremist group
 - (c) See or hear something that may be terrorist-related

13. CONCERNS ABOUT A COLLEAGUE

- 13.1 If you have concerns about a colleague, or an allegation is made about a colleague (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the CEO as soon as possible. If the concerns/allegations are about the CEO, speak to the chair of trustees. The CEO or chair of trustees will then follow the procedures set out in Appendix C, if appropriate.
- 13.2 Where you believe there is a conflict of interest in reporting a concern or allegation about a colleague (including a supply teacher, volunteer or contractor) to the CEO, report it directly to the local authority designated officer (LADO).
- 13.3 If you receive an allegation relating to an incident where an individual or organisation was using the college premises for running an activity for children, follow our college safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

14. ALLEGATIONS OF ABUSE MADE AGAINST OTHER LEARNERS

- 14.1 We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for learners.
- 14.2 We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.
- 14.3 Most cases of learners hurting other learners will be dealt with under our college’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
- (a) Is serious, and potentially a criminal offence
 - (b) Could put learners in the college at risk
 - (c) Is violent
 - (d) Involves learners being forced to use drugs or alcohol
 - (e) Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)
 - See Appendix D for more information about child-on-child abuse.

14.4 DEALING WITH ALLEGATIONS OF CHILD-ON-CHILD ABUSE

- 14.4.1 If a learner makes an allegation of abuse against another learner:
- (a) You must record the allegation and tell the DSL, but do not investigate it
 - (b) The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
 - (c) The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any

others affected) with a named person they can talk to if needed. This will include considering college transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

- (d) The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
 - (e) If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.
- 14.4.2 At Indie Education, all allegations of child-on-child abuse are recorded and responded to with the same seriousness as any other safeguarding concern. The DSL is responsible for coordinating the response and ensuring that each case is managed appropriately and sensitively.
- 14.5 **RECORDING AND REPORTING**
- 14.5.1 All concerns, disclosures, or allegations relating to child-on-child abuse must be recorded promptly and factually on the college's safeguarding system.
- 14.5.2 Colleagues must not investigate the concern themselves, but should pass the information directly to the DSL, including details of what was seen, heard, or disclosed.
- 14.5.3 The DSL will decide on the appropriate next steps and whether the threshold for referral to external agencies has been met.
- 14.6 **INVESTIGATION AND RISK ASSESSMENT**
- 14.6.1 Where appropriate, and following advice from the local authority or police, the DSL may carry out an internal investigation (e.g. where the behaviour does not meet the criminal threshold but still raises safeguarding concerns).
- 14.6.2 A risk assessment will be completed for all children involved to ensure their safety and wellbeing in college. This will include consideration of college transport, shared lessons, supervised spaces, and any social dynamics that could place children at further risk.
- 14.6.3 If required, separate timetables or break/lunch arrangements may be put in place temporarily while support is being provided or an investigation is ongoing.
- 14.7 **SUPPORT FOR VICTIMS**
- 14.7.1 Victims will be offered a named adult to speak with and will be involved in decisions about their support plan wherever appropriate.
- 14.7.2 They will be offered ongoing pastoral support, regular check-ins, and access to external support (e.g. CAMHS, counselling, sexual violence services).
- 14.7.3 Their views will be considered when deciding how to manage contact with the alleged perpetrator and their peer group.

14.8 SUPPORT FOR ALLEGED PERPETRATORS

- 14.8.1 The alleged perpetrator(s) will also be offered pastoral support and may be referred for additional services, especially if there are concerns that their behaviour stems from their own experiences of abuse or trauma.
- 14.8.2 Support will be provided alongside any disciplinary processes, and their voice will be considered when planning ongoing arrangements in college.
- 14.8.3 Where relevant, educational interventions such as restorative sessions or behaviour mentoring may be used to support change and reduce risk.

14.9 SUPPORT FOR OTHER LEARNERS AFFECTED

- 14.9.1 Witnesses or learners indirectly affected will also be supported, recognising that exposure to incidents of abuse can be distressing.
- 14.9.2 Colleagues will be vigilant for signs of secondary trauma, peer conflict, or social isolation following an incident.
- 14.9.3 All actions, including decisions, risk assessments, conversations with parents/carers, and referrals to external services, will be documented securely. The DSL will regularly review each case to ensure the effectiveness of support and safeguarding arrangements.

14.10 MINIMISING THE RISK OF CHILD-ON-CHILD ABUSE

- 14.10.1 We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.
- 14.10.2 To achieve this, we will:
 - (a) Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
 - (b) Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female learners, and initiation or hazing type violence with respect to boys
 - (c) systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
 - (d) Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
 - (e) Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
 - (f) Ensure colleagues are trained to understand:

- i. How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- ii. That even if there are no reports of child-on-child abuse in college, it does not mean it is not happening – colleagues should maintain an attitude of “it could happen here”
- iii. That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - a. Children can show signs or act in ways they hope adults will notice and react to
 - b. A friend may make a report
 - c. A colleague may overhear a conversation
 - d. A child’s behaviour might indicate that something is wrong
 - e. That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - f. That a learner harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
 - g. The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - h. That they should speak to the DSL if they have any concerns
 - i. That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

14.11 DISCIPLINING ALLEGED PERPETRATORS

14.11.1 The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

14.11.2 Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our college from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- (a) Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children’s social care to determine this
- (b) There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

14.12 SHARING OF NUDES AND SEMI-NUDES (‘SEXTING’)

14.12.1 This section follows the guidance set out by the UK Council for Internet Safety (**UKCIS**) and *Keeping Children Safe in Education (2024)*. It applies to all colleagues and leaders at Indie Education.

14.12.2 **Responding to the Incident**

- (a) If you become aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images or videos (sometimes referred to as 'sexting' or 'youth-produced sexual imagery'), including computer-generated or pseudo-images, you must report it to the Designated Safeguarding Lead (DSL) immediately.
- (b) You must not:
 - i. View, copy, print, share, store or save the imagery yourself, or ask a learner to share or download it
 - ii. Delete the imagery or ask the learner to delete it
 - iii. Ask the learner(s) involved to explain or disclose information about the imagery
 - iv. Share any details with colleagues, other learners, or parents/carers without DSL direction
 - v. Blame or shame any young people involved
- (c) You should calmly explain that you are required to report the incident and reassure the learner(s) that they will be supported by the DSL and other appropriate adults.

14.12.3 **Initial Review by the DSL**

- (a) After being informed, the DSL will convene an initial review meeting with relevant safeguarding or senior leadership colleagues. This meeting will determine:
 - i. Whether there is an immediate risk to any learner
 - ii. Whether a referral should be made to the police and/or children's social care
 - iii. If it is necessary to view the image (this will be avoided unless absolutely essential to safeguard)
 - iv. The nature and scope of the incident, including any known sharing on social media or online platforms
 - v. Whether immediate steps should be taken to delete/remove images from devices or online accounts
 - vi. Any known history, vulnerabilities, or SEND that could affect how learners are supported
 - vii. Whether another setting or professional needs to be contacted
 - viii. Whether and when parents/carers will be informed
- (b) Mandatory referrals will be made if:
 - i. An adult is involved or posing as a child
 - ii. There is evidence of coercion, exploitation, blackmail, or grooming
 - iii. A child lacks the capacity to consent (e.g. due to SEND)
 - iv. The content is violent or inappropriate for the child's age
 - v. A child under 13 is depicted in any sexual context
 - vi. There is any indication the learner is at immediate risk of harm (e.g. suicidal ideation or

self-harm)

- If none of the above apply, the DSL may decide to handle the incident internally, with or without external agency involvement. The rationale for this decision will be clearly documented.

14.12.4 **Further Review and Intervention**

- (a) Where external referrals are not made at the initial stage, the DSL will conduct a further review, including interviews with those involved where appropriate, update the risk assessment and support plans, and refer to children's social care or police immediately if new safeguarding concerns emerge.

14.12.5 **Informing Parents and Carers**

- (a) The DSL will normally inform the parents or carers of all children involved at the earliest appropriate stage, unless there is a compelling reason to believe that doing so would place a child at greater risk. This decision will be documented.

14.12.6 **Referrals to Police**

- (a) If a police referral is required, this will be made by the DSL using the following local arrangements:
 - i. Non-urgent incidents: contact via 101
 - ii. Urgent incidents or immediate danger: contact 999
- (b) Where available, the DSL may liaise with the local Colleges Link Officer or neighbourhood policing team for advice.

14.12.7 **Recording and Review**

- (a) All incidents of sharing nudes or semi-nudes, and the decisions made in response, will be recorded in line with the procedures in section 14 of this policy. This includes the time, date and nature of the concern; who was involved; actions taken and by whom; and the rationale for any decisions not to refer externally. Records will be stored securely and separately from the main learner file, accessible only to designated safeguarding colleagues.

14.12.8 **Curriculum Coverage**

- (a) At Indie Education, learners are taught about the sharing of nudes and semi-nudes through both our Relationships and Sex Education (**RSE**) and Computing programmes.
- (b) Teaching includes:
 - iv. What is meant by the sharing of nudes and semi-nudes
 - v. Where and how this type of imagery is typically encountered
 - vi. The legal consequences and safeguarding risks involved
 - vii. The emotional, social and reputational consequences of sharing such content
 - i. The distinction between consensual image sharing and abusive/exploitative behaviours
- (c) Learners are also taught how to respond to pressure or requests to share images, what to do

if they receive an inappropriate image, and how and where to seek help and report concerns safely.

- (d) This education is age-appropriate, regularly revisited, and delivered using best practice principles, including a safeguarding-first approach, promoting a safe and open classroom culture, avoiding scare tactics or victim-blaming language, and supporting positive dialogue and understanding.
- (e) Our approach empowers young people to navigate online pressures safely and respectfully. This policy is also shared with learners through PSHE/RSE sessions and assemblies to ensure they understand the college's procedures and support routes in the event of an incident.

14.13 REPORTING SYSTEMS

14.13.1 Our Reporting Systems Include:

- (a) **Trusted Adults:** All learners are regularly reminded that they can speak to any colleague they trust if they are worried or upset. All colleagues understand their duty to listen, reassure, and respond appropriately.
- (b) **Designated Safeguarding Lead (DSL):** The DSL and Deputy DSL are introduced to learners through assemblies and induction. Learners are told they can approach them directly about any concerns.
- (c) **Anonymous Reporting Box:** We provide a safe, accessible 'worry box' in a discreet location within the college. Learners can post concerns or questions anonymously, which are checked daily by the DSL team.
- (d) **One-to-One Check-ins:** Learners who are vulnerable or have additional needs are offered regular pastoral check-ins with a designated adult.

14.13.2 Where there is a safeguarding concern, we will take the young person's wishes and feelings into account when determining what action to take and what support to provide. We are committed to ensuring that learners feel safe, listened to, and confident in reporting concerns without fear of being judged, dismissed, or punished.

14.13.3 To achieve this, we will:

- (a) Put clear and accessible systems in place for learners to report abuse or concerns
- (b) Promote these systems consistently across the college
- (c) Ensure learners know who they can speak to and feel comfortable doing so
- (d) Reassure learners that disclosures will be taken seriously and handled sensitively

14.13.4 *Raising Awareness of Reporting Processes*

- (a) **Curriculum Integration:** Our Relationships and Sex Education (RSE) and PSHE programmes include discussions about recognising abuse, healthy relationships, and how to seek help. Learners are explicitly taught how and when to report concerns.
- (b) **Visual Reminders:** Posters and visual prompts around the college (e.g. in classrooms,

corridors, toilets) remind learners who their safeguarding team is and how to raise a concern.

- (c) **Learner Voice:** Through learner council meetings and anonymous surveys, we gather feedback on how safe learners feel and whether they know how to report concerns. We use this feedback to improve our systems.

14.13.5 *Creating a Safe Environment for Disclosure*

- (a) Learners are reassured that their concerns will be treated seriously and with respect.
- (b) They are told they will be listened to, believed, and supported.
- (c) We do not promise confidentiality but explain that we will only share information with those who need to know to help keep them safe.
- (d) Colleagues are trained to respond non-judgementally and to avoid asking leading questions.
- (e) Where appropriate, follow-up support and regular check-ins are offered after a disclosure.
- (f) By embedding a culture of openness and trust, we aim to ensure all learners at Indie Education feel safe to speak up and know that action will be taken to support and protect them.

15. ONLINE SAFETY AND THE USE OF MOBILE TECHNOLOGY

15.1 At Indie Education, we recognise the importance of safeguarding learners from harmful and inappropriate online material. Technology is a central part of modern life, and we are committed to ensuring that all members of our college community are supported to use it safely and responsibly. This includes managing risks associated with mobile and smart technology, such as mobile phones and wearable devices.

15.2 We aim to:

- (a) Have robust processes in place, including filtering and monitoring systems to ensure the online safety of learners, colleagues, volunteers and trustees. Indie Education use Senso. Cloud Remote Monitoring and Management to safeguard our online devices. Educate and protect the college community in the safe and responsible use of technology.
- (b) Set clear expectations for the use of mobile phones and smart technology in college
- (c) Identify and respond promptly to any online safety concerns, in line with our safeguarding procedures

15.3 Our approach to online safety is informed by the four key categories of risk:

- (a) **Content:** Being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- (b) **Contact:** Harmful interaction with others online, including grooming, exploitation, bullying, or coercion
- (c) **Conduct:** Behaviour that increases risk or causes harm, including cyberbullying, sharing explicit images, and unsafe online conduct

- (d) Commerce: Risks such as online scams, phishing, gambling, or other financial exploitation

15.4 To address these risks and support safe practice, Indie Education will:

- (a) Educate learners through our Relationships and Sex Education (**RSE**), PSHE and Computing curricula. This includes:
 - (b) Understanding the safe use of the internet and social media
 - (c) Knowing how to keep personal information private
 - (d) Recognising and reporting harmful or inappropriate behaviour
 - (e) Encouraging peer support and reporting as a bystander, not just a victim
- (f) Train all colleagues on online safety during induction and through annual safeguarding updates. Training includes cyberbullying, online exploitation, digital consent, and the risks of online radicalisation. Colleagues are also trained on their roles regarding filtering, monitoring, and reporting.
- (g) Work with parents and carers to raise awareness of online safety. This includes information shared via the college website, regular newsletters, and discussions during parent meetings. Parents are informed of procedures for raising online safety concerns.
- (h) Set clear expectations for the use of mobile phones and personal devices:
 - i. Colleagues may bring personal mobile phones to college but are expected to use them only during non-contact time and never in the presence of learners
 - ii. Colleagues must not use personal phones or devices to take photographs or recordings of learners
 - iii. Learners must follow the college's mobile phone policy, which includes guidance on appropriate use, restrictions during the college day, and expectations for respect and privacy
 - iv. Require all members of the college community (learners, parents, colleagues, trustees, volunteers) to sign an acceptable use agreement outlining responsible use of technology and the internet, both in college and when accessing college systems remotely.
 - v. Explain sanctions clearly in cases where learners breach acceptable use or mobile phone policies. These may include confiscation, restricted access, or further safeguarding action depending on the nature and severity of the breach.
 - vi. Remind all colleagues, learners and parents that designated colleagues have the power to search and, if necessary, confiscate devices where there is reasonable suspicion of inappropriate or harmful content, in line with DfE guidance.
 - vii. Maintain robust filtering and monitoring systems to limit learners' exposure to online risks via college devices or while using the college network. Our filtering and monitoring systems are reviewed regularly to ensure they are effective, age-appropriate and meet statutory requirements.

- viii. Carry out an annual online safety risk assessment, informed by emerging risks and local safeguarding data. This forms part of our wider safeguarding audit process.
- ix. Review this policy annually and provide regular safeguarding updates to all colleagues, including online safety as a core safeguarding issue.
- x. This section summarises our approach to online safety and mobile phone use. Further details can be found in our Online Safety Policy and Mobile Phone Policy, available on our college website

15.5 ARTIFICIAL INTELLIGENCE (AI)

- 15.5.1 At Indie Education, we recognise the increasing presence of generative artificial intelligence (AI) tools such as ChatGPT and Google Bard. AI technologies may have positive uses in supporting learning and college operations; however, they also pose safeguarding risks.
- 15.5.2 We are alert to the potential misuse of AI in:
 - (a) Creating and sharing harmful content
 - (b) Facilitating bullying, harassment or grooming
 - (c) Producing manipulated images, audio or video ('deepfakes')
 - (d) The use of AI to access, create or distribute harmful content or to harass or exploit learners will be treated seriously and in line with this policy, our online safety expectations, and our behaviour and anti-bullying policies.
- 15.5.3 Colleagues are advised to conduct risk assessments before introducing new AI tools into the classroom or wider college systems. Where AI tools are used, their impact on safeguarding and data privacy will be closely monitored, and appropriate boundaries and controls will be implemented.

16. NOTIFYING PARENTS OR CARERS

- 16.1 Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.
- 16.2 Other colleagues will only talk to parents or carers about any such concerns following consultation with the DSL.
- 16.3 If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.
- 16.4 In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.
- 16.5 The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):
 - (a) Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and

how the report will be progressed

- (b) Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

17. LEARNERS WITH SPECIAL EDUCATIONAL NEEDS, DISABILITIES OR HEALTH ISSUES

17.1 We recognise that learners with special educational needs and disabilities (SEND), or those with certain health conditions, can face additional safeguarding challenges. Research consistently shows that children with disabilities are more likely to be abused or neglected than their peers, and they may experience different or additional barriers when it comes to recognising or reporting abuse.

17.2 These barriers can include:

- (a) Assumptions that signs of possible abuse (such as changes in behaviour, mood or presentation) are related to the learner's condition, without further exploration
- (b) Increased vulnerability to isolation or bullying (including prejudice-based bullying)
- (c) Disproportionate impact from harmful behaviours such as bullying, without always displaying obvious signs
- (d) Communication barriers that may hinder a learner's ability to express concerns or describe their experiences
- (e) Limited understanding of social norms, boundaries, or the difference between appropriate and inappropriate behaviour
- (f) Difficulty distinguishing between fact and fiction, particularly in online environments, which can lead to risk-taking or harmful behaviours being replicated in college

17.3 We are committed to providing a safe and supportive environment for all our learners, and we take proactive steps to ensure that safeguarding practices are inclusive and responsive to the needs of learners with SEND or health conditions.

17.4 Extra Pastoral Support for Learners with SEND Includes:

- (a) A named key adult for regular check-ins and pastoral conversations
- (b) A tailored support plan coordinated by the SENCO and reviewed in collaboration with the DSL
- (c) Individualised risk assessments where required (e.g. for intimate care, known vulnerabilities, or behaviour)
- (d) Close and consistent home–college communication with parents/carers
- (e) Opportunities for trusted 1:1 conversation in quiet, low-stimulation spaces
- (f) Use of visual aids, communication cards or social stories to support understanding and expression

- (g) Access to therapeutic support where needed, such as ELSA (Emotional Literacy Support Assistant), external counselling, or referral to CAMHS

17.5 SUPPORTING COMMUNICATION AND EXPRESSION

- (a) Colleagues are trained to use alternative communication methods, including symbols, visuals, or communication aids
- (b) Time is given for learners with processing difficulties to express themselves without pressure
- (c) Concerns may be explored through drawing, role-play or play-based observation where verbal expression is limited
- (d) DSLs and site leads/SENCo's work closely together to identify safeguarding risks and create appropriate plans and responses
 - i. Any safeguarding concern involving a learner with SEND will always include close liaison between the DSL (or deputy) and the Site lead/SENCO to ensure the child's needs, voice, and vulnerabilities are fully understood and considered in any decision-making.
 - ii. We are committed to a child-centred approach in all safeguarding work and ensure that the needs of learners with SEND are never overlooked or minimised.

18. LEARNERS WITH A SOCIAL WORKER

- 18.1 Learners may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.
- 18.2 The DSL and all colleagues will work with and support social workers to help protect vulnerable children.
- 18.3 Where we are aware that a learner has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the learner's safety, welfare and educational outcomes. For example, it will inform decisions about:
 - (a) Responding to unauthorised absence or missing education where there are known safeguarding risks
 - (b) The provision of pastoral and/or academic support

19. LOOKED-AFTER AND PREVIOUSLY LOOKED-AFTER CHILDREN

- 19.1 We will ensure that colleagues have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:
 - (a) Appropriate colleagues have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
 - (b) The DSL has details of children's social workers and relevant virtual college heads
 - (c) We have appointed an appropriately trained teacher, name/role, to take the lead on

promoting the educational achievement of looked-after and previously looked-after children.

viii. As part of their role, they will:

- a. Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- b. Work with virtual college heads to promote the educational achievement of looked-after and previously looked-after children

20. LEARNERS WHO ARE LESBIAN, GAY, BISEXUAL OR GENDER QUESTIONING

20.1 We recognise that learners who are, or are perceived to be, lesbian, gay, bisexual, or gender questioning (LGBTQ+) can face particular safeguarding vulnerabilities. These learners may be more likely to experience bullying, discrimination, isolation or poor mental health and may not always have a trusted adult at home or in college to confide in.

20.2 In line with *Keeping Children Safe in Education (2024)* and best practice, we are committed to creating a safe and inclusive college environment where all learners feel valued, respected and supported, regardless of their gender identity or sexual orientation.

20.3 Key principles include:

- (a) LGBTQ+ learners may be targeted by other children due to actual or perceived differences
- (b) Bullying related to gender identity, sexuality or perceived LGBTQ+ status is not tolerated and is addressed in line with our Behaviour and Anti-Bullying Policy
- (c) LGBTQ+ learners are statistically more likely to experience mental health challenges, including anxiety, low mood and self-harm
- (d) Any safeguarding or wellbeing concerns should be reported to the Designated Safeguarding Lead (DSL)

20.4 Pastoral Support for LGBTQ+ Learners Includes:

- (a) Access to a named pastoral colleague who learners can approach for confidential support
- (b) Regular check-ins for LGBTQ+ learners identified as needing emotional or social support
- (c) Colleague training to ensure all colleagues understand how to respond sensitively and supportively to disclosures or questions related to gender or sexual identity
- (d) Signposting to external services and support networks where appropriate, such as Stonewall, Mermaids, and Young Minds
- (e) Whole-college education on inclusion, respect and diversity delivered through the PSHE curriculum, assemblies and themed weeks

20.5 SUPPORTING GENDER QUESTIONING LEARNERS

20.5.1 We recognise that supporting gender questioning learners requires careful, individualised

consideration. We take a **cautious and measured approach**, in line with national guidance. This includes:

- (a) Working in partnership with parents/carers wherever it is safe to do so, and involving them early
- (b) Encouraging families to seek clinical advice and support, particularly when supporting pre-pubertal children
- (c) Considering the learner's broader needs, including any mental health, emotional, or neurodevelopmental concerns (e.g. ASD or ADHD)
- (d) Being mindful of the ongoing national review of guidance on gender questioning children and adjusting our practice accordingly
- (e) Avoiding making assumptions or placing learners under pressure to define their identity
- (f) Creating space for open dialogue and emotional support while decisions around social transition or support are explored

20.6 OUR CULTURE OF SAFETY AND TRUST

20.6.1 We are committed to reducing barriers to disclosure by ensuring that:

- (a) Learners know who they can talk to and trust that they will be listened to without judgement
- (b) Confidentiality is respected where appropriate, and learners are never "outed" without careful consideration of safeguarding implications
- (c) Colleagues model respectful, inclusive language and challenge homophobic, biphobia or transphobic language or behaviour
- (d) LGBTQ+ inclusion is embedded in our curriculum and wider college ethos
- (e) LGBTQ+ learners at Indie Education feel safe, seen, and supported, and that all colleagues are equipped to promote equality and challenge discrimination in all forms.

21. SAFEGUARDING COMPLAINTS AND CONCERNS

21.1 At Indie Education, we recognise that safeguarding-related complaints may extend beyond allegations against colleagues. These may include concerns about the behaviour or wellbeing of learners, the safety or suitability of the college premises, or the application of college policies and procedures that impact learner welfare.

21.2 All safeguarding-related complaints of this nature will be taken seriously and handled in line with our safeguarding procedures and/or complaints policy, depending on the nature and level of risk involved.

21.3 Examples may include:

- (a) Concerns about unsafe supervision or poor colleagues-to-learner ratios
- (b) Issues relating to site security, physical safety or hygiene
- (c) Complaints regarding bullying, discriminatory behaviour or peer conflict that may have

safeguarding implications

- (d) Concerns about inadequate access arrangements, intimate care or inclusion practices

21.4 When such complaints are raised:

- (a) They will be recorded and referred to the Designated Safeguarding Lead (DSL) for initial review
- (b) The DSL will assess whether the concern meets the threshold for a safeguarding response or should be managed through other routes (e.g. behaviour policy, SEN procedures, or the formal complaints process)
- (c) Where necessary, concerns will be escalated to the CEO or external safeguarding partners (e.g. local authority children's social care or the Local Authority Designated Officer)
- (d) All actions and decisions will be recorded securely and followed up in a timely manner

21.5 We encourage learners, parents and colleagues to raise concerns early and without fear. Creating a culture of openness, vigilance and accountability is central to our safeguarding approach.

21.6 For complaints not involving safeguarding concerns, our general complaints procedure should be followed. This is available on request or via the college website.

21.7 **COMPLAINTS AGAINST COLLEAGUES**

21.7.1 Complaints against colleagues that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against colleagues (see Appendix C).

22. **WHISTLEBLOWING**

22.1 Indie Education is committed to the highest standards of integrity and accountability. We expect all members of our college community to raise concerns where they believe that the safety or wellbeing of learners may be at risk or that safeguarding practices are not being followed appropriately.

22.2 Our separate Whistleblower Policy outlines the procedures for reporting concerns about malpractice or wrongdoing, including those related to safeguarding. This includes concerns about:

- (a) Unsafe or poor safeguarding practices
- (b) Failure to follow statutory safeguarding guidance
- (c) Inappropriate behaviour by another colleague
- (d) Mismanagement or cover-up of safeguarding incidents
- (e) Conduct which places children or young people at risk of harm

22.3 **HOW TO RAISE A CONCERN**

22.3.1 Colleagues can raise concerns:

- (a) Directly with the CEO
- (b) If the concern involves the CEO, directly with the chair of trustees

- (c) With the Designated Safeguarding Lead (DSL) if the concern is linked to child protection practices
- (d) Anonymously through a written note if necessary, although this may limit the ability to follow up

22.3.2 If colleagues feel unable to raise concerns internally or believe their concern has not been addressed, they can contact:

- (a) The Local Authority Designated Officer (LADO):
 - Email: lado-allegations-referrals@leicester.gov.uk
 - Phone: 0116 454 2440
- (b) The NSPCC Whistleblowing Advice Line (available for colleagues who do not feel able to raise concerns about child protection failures internally):
 - Email: help@nspcc.org.uk
 - Phone: 0800 028 0285 or

22.4 HOW THE COLLEGE WILL RESPOND

22.4.1 All concerns raised under the whistle-blowing procedure will be taken seriously. The CEO (or Chair of trustees, where appropriate) will:

- (a) Acknowledge receipt of the concern
- (b) Carry out an initial assessment to determine the appropriate action
- (c) Ensure the matter is investigated thoroughly, fairly and confidentially
- (d) Take appropriate safeguarding or disciplinary action if required

22.5 PROTECTION FOR WHISTLEBLOWERS

22.5.1 In accordance with the Public Interest Disclosure Act 1998, colleagues who raise concerns in good faith will not face discrimination, harassment or victimisation as a result. Any attempt to deter someone from raising a concern, or to victimise them for doing so, will be treated as a serious disciplinary matter.

22.5.2 We are committed to ensuring a culture of transparency and accountability in which all colleagues feel empowered and supported to speak up in the best interests of children.

23. RECORD-KEEPING

23.1 We will hold records in line with our records retention schedule, following guidance from the Independent Colleges Inspectorate (ISI), the Information and Records Management Society (IRMS), and statutory safeguarding guidance including *Keeping Children Safe in Education (KCSIE 2025)*.

23.2 OUR APPROACH TO RECORD-KEEPING

- (a) All safeguarding records at Indie Education are stored electronically using monitoring system, our secure, cloud-based child protection management system.

- (b) Our internal monitoring system allows authorised colleagues to log concerns, upload supporting evidence, track actions, and link incidents to wider safeguarding issues.
- (c) Access to our monitoring system is strictly limited to the DSL, Deputy DSLs, and other designated safeguarding leads on a need-to-know basis. All users have individual, password-protected logins and are subject to strict data handling expectations.
- (d) Safeguarding records are held separately from the main learner file and not accessible to teaching or administrative colleagues unless appropriate.

23.2.2 ***What We Record***

- (a) All safeguarding concerns, discussions, decisions and the rationale for those decisions are recorded in writing on our monitoring system. This includes:
 - (b) A clear and comprehensive summary of the concern
 - (c) Details of how the concern was followed up and resolved
 - (d) A record of any actions taken, decisions made, and outcomes
 - (e) The reason for any referral or decision not to refer to an external agency (e.g. children's social care, the Prevent duty, CAMHS)
 - (f) Where colleagues are unsure whether a concern meets the threshold for logging, they are instructed to consult with the DSL immediately.

23.2.3 ***Security and Confidentiality***

- (a) Records are encrypted and stored securely, with strict access controls.
- (b) Safeguarding records are treated as confidential and are only accessible to those who have a legitimate safeguarding role.
- (c) Any printed safeguarding documents (e.g. reports for case meetings) are kept in a locked cabinet in the DSL's office and are securely destroyed once no longer required.

23.2.4 ***Retention of Records***

- (a) Safeguarding records are retained in accordance with our records retention policy.
- (b) In most cases, this means that child protection records are retained until the learner's 25th birthday, in line with ISI and IRMS guidance.
- (c) Retention periods may be extended in cases of historic abuse, ongoing legal proceedings, or known future risks.

23.2.5 ***Transferring Safeguarding Records***

- (a) If a learner with safeguarding concerns moves to another college:
 - i. The DSL will ensure their child protection file is transferred securely, separate from the main learner file.
 - ii. This transfer will be completed within 5 days of an in-year transfer or within the first 5 days of a new term.
 - iii. If the case is complex or involves social care, the DSL will also speak to the receiving

college's DSL to provide context and agree support arrangements.

23.2.6 *Sharing Information with Other Agencies*

- (a) We share information with external agencies in accordance with Working Together to Safeguard Children (2018) and local safeguarding arrangements.
- (b) Information is shared on a 'need to know' basis, in the best interests of the child.
- (c) Parental consent will be sought where appropriate, but information may be shared without consent if there is reason to believe that seeking consent would place the child at risk.
- (d) Agencies we may share information with include:
 - i. Local authority children's social care
 - ii. Early Help services
 - iii. Police
 - iv. CAMHS or health professionals
 - v. Education Welfare Services
 - vi. Local Authority Designated Officer (LADO)
 - vii. Other colleges, where children transfer
- (e) Where safeguarding concerns require multi-agency intervention, we will contribute to meetings such as Child in Need, Child Protection Conferences, and Team Around the Family (TAF) meetings, and share records accordingly.
- (f) We are committed to maintaining high standards of confidentiality, security and professional responsibility in all safeguarding record-keeping and information sharing.
 - i. In addition:
 - a. Appendix B sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
 - b. Appendix C sets out our policy on record-keeping with respect to allegations of abuse made against colleagues

24. SAFEGUARDING TRAINING

24.1 Colleagues

- 24.1.1 All colleagues will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the college's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.
- 24.1.2 This training will be regularly updated and will:
 - (a) Be integrated, aligned and considered as part of the whole-organisation's safeguarding approach and wider colleagues training, and curriculum planning
 - (b) Be in line with advice from the 3 safeguarding partners

- (c) Include online safety, including an understanding of the expectations, roles and responsibilities for colleagues around filtering and monitoring
- (d) Have regard to the Teachers' Standards to support the expectation that all teachers:
 - i. Manage behaviour effectively to ensure a good and safe environment
 - ix. Have a clear understanding of the needs of all learners

24.1.3 All colleagues will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

24.1.4 Colleagues will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and colleagues meetings).

24.1.5 Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

24.1.6 Volunteers will receive appropriate training, if applicable.

24.2 The DSL and Deputies

24.2.1 The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

24.2.2 In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

24.2.3 They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

24.3 Trustees

24.3.1 All trustees receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- (a) Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- (b) Can be assured that safeguarding policies and procedures are effective and support the college to deliver a robust whole-organisation approach to safeguarding

24.3.2 As the chair of trustees may be required to act as the 'case manager' in the event that an allegation of abuse is made against the CEO, they receive training in managing allegations for this purpose.

24.4 Recruitment

24.4.1 At least one person conducting any interview for any post at the college will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

- See Appendix B of this policy for more information about our safer recruitment procedures.

25. RELATED DOCUMENTS

25.1 Policies And Procedures

- (a) Behaviour Policy
- (b) Anti-bullying Policy
- (c) Code of Conduct
- (d) Complaints Policy
- (e) Health and Safety Policy
- (f) Online Safety Policy
- (g) Social Media Policy
- (h) Equality Strategy and Accessibility Policy
- (i) Relationships and Sex Education Policy
- (j) Curriculum Policy
- (k) Privacy Notices

25.2 Legislation and Statutory Guidance

25.2.1 We comply with the following legislation and guidance as well as the arrangements agreed and published by our three local safeguarding partners

- (a) Keeping Children Safe in Education (2024)
- (b) Working Together to Safeguard Children (2023)
- (c) Maintained Colleges Governance Guide
- (d) Academy Trust Governance Guide
- (e) Schedule, Part 1 of The Non-Maintained Special Colleges (England) Regulations 2015
 - Places a duty on non-maintained special colleges to safeguard and promote the welfare of learners at the college
- (f) The Children Act 1989 and 2004 Amendment
 - Provides a framework for the care and protection of children
 - *Section 5B(11) of the Female Genital Mutilation Act 2003*, as inserted by Section 74 of the *Serious Crime Act 2015*
 - Places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- (g) Multi-Agency Statutory Guidance on Female Genital Mutilation
 - Sets out responsibilities for safeguarding and supporting girls affected by FGM
- (h) The Rehabilitation of Offenders Act 1974
 - Outlines when people with criminal convictions can work with children

- (i) Schedule 4 of the Safeguarding Vulnerable Groups Act 2006
 - Defines what 'regulated activity' is in relation to children
- (j) Prevent Duty Guidance for Specified Authorities in England and Wales
 - Explains our college and other colleges' duties under the *Counter-Terrorism and Security Act 2015* with respect to protecting people from the risk of radicalisation and extremism
- (k) The Human Rights Act 1998
 - Explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the *European Convention on Human Rights (ECHR)*
- (l) The Equality Act 2010
 - Makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race), emphasising the importance of supporting learners with regard to these characteristics.
 - Allows our college to take positive action to deal with particular disadvantages affecting learners (where we can show it's proportionate), such as, making reasonable adjustments for disabled learners.
 - ♦ For example, taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- (m) The Public Sector Equality Duty (PSED)
 - States that we must have due regard to eliminating unlawful discrimination, harassment and victimisation.
 - The PSED helps us to focus on key issues of concern and how to improve learner outcomes.
 - ♦ Some learners may be more at risk of harm from issues such as sexual violence; homophobic, biphobia or transphobic bullying; or racial discrimination.

26. POLICY REVIEW

- 26.1 In accordance with Indie's policy review protocol, this Policy will be reviewed annually. If there are material changes to circumstances before the 12-month review period, this Policy will be reviewed immediately to ensure its contents remain effective and up to date.

27. AUTHORISATION

- 27.1 This document has been authorised by the Chief Executive Officer.

APPENDIX A: IDENTIFYING TYPES OF ABUSE

1. OVERVIEW

- 1.1 Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

1.2 PHYSICAL ABUSE

- 1.2.1 Physical abuse 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.

1.3 EMOTIONAL ABUSE

- 1.3.1 Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- 1.3.2 Emotional abuse may involve:

- (a) Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- (b) Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- (c) Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- (d) Seeing or hearing the ill-treatment of another
- (e) Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

1.4 SEXUAL ABUSE

- 1.4.1 Sexual abuse involves forcing or enticing a child or learner 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.

- 1.4.2 The activities may involve:

- (a) 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
- (b) Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)
- (c) Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual

abuse, as can other children.

1.5 NEGLECT

1.5.1 Neglect is the persistent failure to meet a child's basic physical, psychological and/or emotional needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

1.5.2 Once a child is born, neglect may involve a parent or carer failing to:

- (a) Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- (b) Protect a child from physical and emotional harm or danger
- (c) Ensure adequate supervision (including the use of inadequate care-givers)
- (d) Ensure access to appropriate medical care or treatment

APPENDIX B: SAFER RECRUITMENT AND DBS CHECKS

1. RECRUITMENT AND SELECTION PROCESS

1.1 To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of colleagues to work with children have received appropriate safer recruitment training. We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

1.2 ADVERTISING

1.2.1 When advertising roles, we will make clear:

- (a) Our college's commitment to safeguarding and promoting the welfare of children
- (b) That safeguarding checks will be undertaken
- (c) The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- (d) Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020.
- (e) If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

1.3 APPLICATION FORMS

1.3.1 Our application forms will:

- (a) Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- (b) Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

1.4 SHORTLISTING

1.4.1 Our shortlisting process will involve at least 2 people and will:

- (a) Consider any inconsistencies and look for gaps in employment and reasons given for them
- (b) Explore all potential concerns

1.4.2 Once we have shortlisted candidates, we will ask shortlisted candidates to complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at the interview stage.

1.4.3 The information we may ask for includes:

- (a) If they have a criminal history
- (b) Whether they are included on the barred list

- (c) Whether they are prohibited from teaching
- (d) Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- (e) Any relevant overseas information
- (f) If they are known to the policy and children's local authority social care
- (g) If they have been disqualified from providing childcare a declaration confirming the information they have provided is true

1.4.4 We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

1.5 REFERENCES AND EMPLOYMENT HISTORY

1.5.1 We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

1.5.2 When seeking references we will:

- (a) Not accept open references
- (b) Liaise directly with referees and verify any information contained within references with the referees
- (c) Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is college based, we will ask for the reference to be confirmed by the CEO as accurate in respect to disciplinary investigations
- (d) Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- (e) Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- (f) Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- (g) Resolve any concerns before any appointment is confirmed

1.6 INTERVIEW AND SELECTION

1.6.1 When interviewing candidates, we will:

- (a) Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- (b) Explore any potential areas of concern to determine the candidate's suitability to work with children
- (c) Record all information considered and decisions made

1.7 PRE-APPOINTMENT AND VETTING CHECKS

1.7.1 We will record all information on the checks carried out in the college's Single Central Record

(SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

1.7.2 **New Colleagues**

- (a) All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks.
- (b) When appointing new colleagues, we will:
 - i. Verify their identity
 - ii. Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below).
 - iii. Obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service.
 - iv. Not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.
 - v. Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
 - vi. Verify their mental and physical fitness to carry out their work responsibilities
 - vii. Verify their right to work in the UK. We will keep a copy of this verification for the duration of the colleagues' employment and for 2 years afterwards
 - viii. Verify their professional qualifications, as appropriate
 - ix. Ensure they are not subject to a prohibition order if they are employed to be a teacher
 - x. Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including:
 - a. Criminal record checks for overseas applicants seeking teaching and non-teaching positions
 - b. Obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable for a teaching position
 - xi. Check that candidates taking up a management position are not subject to a prohibition from management (Section 128) direction made by the secretary of state
 - ◆ Note that management positions include, but are not limited to, headteacher, principals, and deputy/assistant headteachers.

1.7.3 **Existing Colleagues**

- (a) In certain circumstances we will carry out all the relevant checks on existing colleagues as if the individual was a new colleague. These circumstances are when:

- i. There are concerns about an existing colleague's suitability to work with children; or
 - ii. An individual moves from a post that is not regulated activity to one that is; or
 - iii. There has been a break in service of 12 weeks or more.
- (b) We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- i. We believe the individual has engaged in relevant conduct; or
 - ii. We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
 - iii. We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
 - iv. The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

1.7.4 ***Agency and Third-Party Colleagues***

- (a) We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

1.7.5 ***Contractors***

- (a) Indie will ensure that any contractor, or any colleague of the contractor, who is to work at the college has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract.
- (b) This will be:
- i. An enhanced DBS check with barred list information for contractors engaging in regulated activity
 - ii. An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- (c) Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- (d) Additionally, We will:
- i. Obtain the DBS check for self-employed contractors.
 - ii. Not keep copies of such checks for longer than 6 months.
 - iii. Check the identity of all contractors and their colleagues on arrival at the college.

1.7.6 ***Trainee/Learner Teachers***

- (a) Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.
- (b) Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

1.7.7 ***Volunteers***

- (a) We will:
 - i. Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
 - ii. Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
 - iii. Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

1.7.8 ***Trustees***

- (a) All trustees will have the following checks:
 - i. An enhanced DBS check without barred list information
 - iii. A 'Section 128' check for checking prohibition on participation in management under Section 128 of the Education and Skills Act 2008).
 - ii. An identity check
 - iii. A right to work in the UK check
 - iv. Any other checks deemed necessary if they have lived or worked outside the UK
 - ◆ Note that the chair of trustees will have their DBS check countersigned by the secretary of state.

1.7.9 ***Colleagues Working in Alternative Provision Settings***

- (a) Where we place a learner with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

1.7.10 ***Adults Supervising Learners on Work Experience***

- (a) When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.
- (b) We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a learner under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

1.7.11 *Learners Staying with Host Families*

- (a) Where the college makes arrangements for learners to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will:
 - i. Request enhanced DBS checks with barred list information on those people where the college is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner colleges abroad to ensure that similar assurances are undertaken prior to the visit.

APPENDIX C: ALLEGATIONS AGAINST COLLEAGUES (AND LOW-LEVEL CONCERNS)

1. ALLEGATIONS THAT MAY MEET THE HARM THRESHOLD

- 1.1 An allegation may meet the harm threshold if a colleague has:
- (a) Behaved in a way that has harmed or may have harmed a child
 - (b) Possibly committed a criminal offence against or related to a child
 - (c) Behaved toward children in a way that indicates they may pose a risk of harm
 - (d) Behaved in a way that indicates they may not be suitable to work with children (including behaviour outside of the college)

- 1.2 If there is ever any doubt as to whether an allegation meets the harm threshold, Indie will promptly seek advice from the local authority designated officer (LADO).

1.3 KEY ROLES AND RESPONSIBILITIES

- 1.3.1 Indie will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.
- 1.3.2 A case manager will lead any investigation. This will be the CEO, or DCEO if asked or the chair of trustees where the CEO is the subject of the allegation. The case manager will be identified at the earliest opportunity.
- 1.3.3 If we receive an allegation of an incident happening while an individual or organisation was using the college premises to run activities for children we will follow our safeguarding policies and procedures and inform our LADO.

1.4 SUSPENSION OF INDIVIDUAL UNDER INVESTIGATION

- 1.4.1 Suspension of the individual under investigation is not the default action and will only be considered when there is a reason to suspect that a child or other children are at risk of harm, or if the case is so serious that dismissal might be warranted. In such situations, suspension will only be implemented after all other options have been thoroughly considered and deemed unreasonable.
- 1.4.2 Based on an assessment of risk, we will consider alternatives such as:
- (a) Redeployment within the college so that the individual does not have direct contact with the child or children concerned
 - (b) Providing an assistant to be present when the individual has contact with children
 - (c) Redeploying the individual to alternative work in the college so that they do not have unsupervised access to children
 - (d) Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
 - (e) Temporarily redeploying the individual to another role in a different location, for example to

an alternative college or other work for the local authority

- 1.4.3 If in doubt, the case manager will seek views from the college's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

1.5 OUTCOMES

- (a) **Substantiated** – there is sufficient evidence to prove the allegation
- (b) **Malicious** – there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- (c) **False** – there is sufficient evidence to disprove the allegation
- (d) **Unsubstantiated** – there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- (e) **Unfounded** – to reflect cases where there is no evidence or proper basis that supports the allegation being made

1.6 DEALING WITH ALLEGATIONS

- 1.6.1 In the event that an allegation meets the criteria set out in section 1, the case manager will take immediate action by:

- (a) Conducting basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before continuing.
 - i. Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation.
 - ii. If necessary, the DSL may make a referral to local authority children's social care
- (b) Discussing the allegation with the designated officer at the local authority to consider the nature, content and context of the allegation and agree on a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services.
 - i. Where the police and/or local authority for children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- (c) Considering whether it's necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police.
- (d) Seeking advice from the designated officer, police and/or local authority children's social care services, as appropriate

- (e) Considering, where appropriate (in the circumstances described above), whether suspension of the individual from contact with children at the college is justified or whether alternative arrangements such as those outlined above can be put in place.
 - i. If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer.
 - ii. The record will include information about the alternatives to suspension that have been considered, and why they were rejected.
 - iii. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the college and their contact details
- (f) Informing the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary).
- (g) Providing effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- (h) Informing the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable).
 - i. The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing.
 - ii. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- (i) Keeping the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the colleague)
- (j) Making a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

1.6.2 **Interim Prohibition Orders**

- (a) If the college is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- (b) Where the police are involved, wherever possible the college will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the college's disciplinary process, should this be required at a later point.

1.6.3 **No Further Action**

- (a) If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

1.6.4 **Further Action Required**

- (a) If it is decided that further action is required, take steps as agreed with the designated officer to initiate the appropriate action in college and/or liaise with the police and/or local authority children's social care services as appropriate

1.6.5 **Considerations for Supply Teachers and Contracted Colleagues**

- (a) If there are concerns or an allegation is made against someone not directly employed by the college, such as a supply teacher or contracted colleague provided by an agency, we will take the actions below in addition to our standard procedures.
 - i. We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
 - ii. The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the college, while the college carries out the investigation
 - iii. We will involve the agency fully, but the college will take the lead in collecting the necessary information and providing it to the LADO as required
 - iv. We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
- (b) When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

1.7 **TIMESCALES**

1.7.1 We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- (a) Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- (b) If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- (c) If a disciplinary hearing is required and can be held without further investigation, this should

be held within 15 working days

- However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

1.8 ACTIONS PER SCENARIO

1.8.1 *Following a Criminal Investigation or Prosecution*

- (a) The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority children's social care services.

1.8.2 *Case Conclusion Where the Allegation is Substantiated*

- (a) If the allegation is substantiated and the individual is dismissed or the college ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the college will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
- (b) If the individual concerned is a teacher, the college will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

1.8.3 *Individuals Returning to Work After Suspension*

- (a) If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.
- (b) The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the college.

1.9 UNSUBSTANTIATED OR MALICIOUS REPORTS

1.9.1 If a report or allegation is:

- (a) Determined to be unsubstantiated, unfounded, false or malicious
 - i. the DSL or LADO and case manager will consider the appropriate next steps. If they suspect that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate.
- (b) Shown to be deliberately invented, or fabricated with malicious intent
 - i. the college will consider whether disciplinary action is appropriate against the individual(s) who made it.

1.10 CONFIDENTIALITY AND INFORMATION SHARING

1.10.1 The college will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

1.10.2 The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

- (a) Who needs to know about the allegation and what information can be shared
- (b) How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- (c) What, if any, information can be reasonably given to the wider community to reduce speculation
- (d) How to manage press interest if, and when, it arises

1.11 RECORD KEEPING

- 1.11.1 The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.
- 1.11.2 The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).
- 1.11.3 For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:
 - (a) A clear and comprehensive summary of the allegation
 - (b) Details of how the allegation was followed up and resolved
 - (c) Notes of any action taken, decisions reached and the outcome
 - (d) A declaration on whether the information will be referred to in any future reference
 - i. In these cases, the college will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.
- 1.11.4 We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

1.12 REFERENCES

- 1.12.1 When providing employer references, we will:
 - (a) Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations that have all been found to be false, unfounded, unsubstantiated or malicious
 - (b) Include substantiated allegations, provided that the information is factual and does not include opinions

1.13 LEARNING LESSONS

- 1.13.1 After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the college's procedures or practice to help prevent similar events in the future.
- 1.13.2 This will include consideration of (as applicable):
 - (a) Issues arising from the decision to suspend the colleague

- (b) The duration of the suspension
- (c) Whether or not the suspension was justified
- (d) The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual
 - For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

1.14 **NON-RECENT ALLEGATIONS**

- (a) Abuse can be reported, no matter how long ago it happened.
- (b) We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.
- (c) Where an adult makes an allegation to the college that they were abused as a child, we will advise the individual to report the allegation to the police.

2. CONCERNS THAT DO NOT MEET THE HARM THRESHOLD

2.1 This section applies to all concerns (including allegations) about colleagues, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out above.

2.2 Concerns may arise through:

- (a) Suspicion
- (b) Complaint
- (c) Safeguarding concern or allegation from another colleague
- (d) Disclosure made by a child, parent or other adult within or outside the college
- (e) Pre-employment vetting checks

2.3 We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

2.4 **LOW-LEVEL CONCERNS**

2.4.1 The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the college may have acted in a way that:

- (a) Is inconsistent with the colleagues code of conduct, including inappropriate conduct outside of work, and
- (b) Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

2.4.2 Examples of such behaviour could include, but are not limited to:

- (a) Being overly friendly with children
- (b) Having favourites
- (c) Taking photographs of children on their mobile phone

- (d) Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- (e) Humiliating learners

2.4.3 **Sharing Low-Level Concerns**

- (a) We recognise the importance of creating a culture of openness, trust and transparency to encourage all colleagues to confidently and confidentially share low-level concerns. These may relate to the conduct of a colleague, visitor, volunteer or contractor and are shared so that they can be addressed promptly and proportionately, helping to prevent more serious safeguarding issues from arising.
- (b) We will create and maintain this culture by:
 - i. Ensuring all colleagues are clear on the standards of expected and appropriate behaviour, as outlined in our Code of Conduct
 - ii. Supporting colleagues to distinguish between appropriate, problematic and concerning behaviours in themselves and others
 - iii. Empowering colleagues to report low-level concerns in line with section 7.2 of this policy, including concerns about themselves (self-referral)
 - iv. Addressing unprofessional conduct early, in a constructive and supportive manner
 - v. Handling reports of low-level concerns with professional curiosity, discretion, and sensitivity
 - vi. Using patterns in low-level concerns to reflect on and improve our safeguarding culture and systems

2.4.4 **Creating an Open and Safe Culture**

- (a) The CEO and DSL (DCEO) play a central role in modelling and maintaining a safe culture in which low-level concerns are welcomed rather than feared.
- (b) To embed this:
 - i. Both CEO and DCEO promote a safeguarding-first ethos, regularly reminding colleagues that raising concerns — even if unsure — is the professional and responsible thing to do
 - ii. The DSL (DCEO) is available to confidentially receive and record any low-level concerns, and maintains an overview of patterns, repeat concerns, or safeguarding implications
 - iii. All low-level concerns are logged securely in a central, confidential record that is separate from personnel files, and are retained in line with our data protection responsibilities
 - iv. Regular colleagues briefings and training sessions revisit key safeguarding behaviours, reinforce our whistle-blowing and low-level concerns procedures, and provide space for professional reflection
 - v. Colleagues are encouraged to speak up early, with reassurance that concerns will be listened to, handled proportionately, and used to protect both learners and colleagues

- (c) Our aim is to foster a culture where all colleagues feel psychologically safe to raise any concern, big or small, in the knowledge that it will be taken seriously and handled professionally.

2.4.5 **Responding to Low-Level Concerns**

- (a) If a low-level concern is raised, the DCEO will take responsibility for ensuring that the matter is handled in a timely, proportionate and sensitive way, in line with our colleagues Code of Conduct and the principles set out in *Keeping Children Safe in Education (2024)*.
- (b) If the concern is raised via a third party, the DCEO will:
 - i. Speak directly to the person who raised the concern (unless it was submitted anonymously)
 - ii. Speak to the individual the concern relates to
 - iii. Speak with any witnesses or relevant colleagues where appropriate
 - iv. Review relevant documentation, including behaviour logs, safeguarding records, or previous low-level concerns
- (c) The DCEO will then:
 - i. Categorise the behaviour to determine whether it is in line with expectations, inappropriate but not harmful, or if it may indicate a more serious safeguarding or disciplinary concern
 - ii. Record the concern and the rationale for any decisions made, ensuring it is added to the college's confidential low-level concerns log
 - iii. Consult the CEO, where there may be safeguarding implications or patterns emerging across multiple concerns
 - iv. Where necessary, take informal action such as support, mentoring, reflective discussion, or further training
 - v. Where patterns of low-level concerns or repeated behaviours are identified, consider whether the matter requires escalation under the college's safeguarding, capability, or disciplinary procedures

2.5 **FEEDBACK AND CONFIDENTIALITY**

- 2.5.1 The DCEO may provide appropriate feedback to the individual who raised the concern, reinforcing the culture of openness and trust.
- 2.5.2 All concerns will be treated with discretion. Confidentiality will be respected unless the concern becomes a formal safeguarding or disciplinary matter, in which case relevant parties will be informed appropriately.
- 2.5.3 Individuals subject to a low-level concern will be given an opportunity to respond and, where appropriate, be supported through reflection or professional development.

2.6 GUIDANCE AND BEST PRACTICE

2.6.1 This approach is informed by guidance from Developing and Implementing a Low-Level Concerns Policy: A Guide for Organisations which Work with Children (Farrer & Co., 2022), as referenced in KCSIE.

2.6.2 Our aim is to ensure that low-level concerns are used proactively and positively to support colleagues, uphold high standards, and protect learners by addressing potential issues before they escalate.

2.7 RECORD KEEPING

2.7.1 All low-level concerns are to be recorded by the DCEO in a secure digital log, separate from personnel files.

2.7.2 Each entry includes the date, names of those involved (where appropriate), a summary of the concern, how it was responded to, and the outcome.

Records are reviewed regularly by the DCEO and CEO to identify any concerning patterns or organisational learning points. If a concern is reclassified as a safeguarding or conduct matter, it will be escalated immediately, and the appropriate procedures will be followed. All low-level concerns will be recorded in secure digital log. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

2.7.3 Records will be:

- (a) Kept confidential, held securely and comply with the Data Protection Act 2018 and the UK GDPR
- (b) Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- (c) Retained at least until the individual leaves employment at Indie Education.

2.7.4 Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

2.8 REFERENCES

2.8.1 We will not include low-level concerns in references unless:

- (a) The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- (b) The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance.

APPENDIX D: SPECIFIC SAFEGUARDING ISSUES

1. ADULT-INVOLVED NUDE/SEMI NUDE SHARING INCIDENTS

- 1.1 All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.
- 1.2 There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

2. SEXUALLY MOTIVATED INCIDENTS

- 2.1 In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or learner using online platforms.
- 2.2 To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or learner to encourage a response and build trust. The offender often grooms the child or learner on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made.
- 2.3 To encourage the child or learner to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.
- 2.4 Once a child or learner shares a nude or semi-nude, an offender may blackmail the child or learner into sending more images by threatening to release them online and/or send them to friends and family.
- 2.5 Potential signs of adult-involved grooming and coercion can include the child or learner being:
 - (a) Contacted by an online account that they do not know but appears to be another child or learner
 - (b) Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
 - (c) Moved from a public to a private/E2EE platform
 - (d) Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
 - (e) Offered something of value such as money or gaming credits
 - (f) Threatened or blackmailed into carrying out further sexual activity. This may follow the child or learner initially sharing the image or the offender sharing a digitally manipulated image of the child or learner to extort 'real' images

3. FINANCIALLY MOTIVATED INCIDENTS

- 3.1 Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or learner unless they pay money or do something else to benefit them.
- 3.2 Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (**OCGs**) overseas and are only motivated by profit. Adults are usually targeted by these groups too.
- 3.3 Offenders will often use a false identity, sometimes posing as a child or learner, or hack another learner's account to make initial contact. To financially blackmail the child or learner, they may:
- (a) Groom or coerce the child or learner into sending nudes or semi-nudes and financially blackmail them
 - (b) Use images that have been stolen from the child or learner taken through hacking their account
 - (c) Use digitally manipulated images, including AI-generated images, of the child or learner
- 3.4 The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.
- 3.5 Potential signs of adult-involved financially motivated sexual extortion can include the child or learner being:
- (a) Contacted by an online account that they do not know but appears to be another child or learner. They may be contacted by a hacked account of a child or learner
 - (b) Quickly engaged in sexually explicit communications which may include the offender sharing an image first
 - (c) Moved from a public to a private/E2EE platform
 - (d) Pressured into taking nudes or semi-nudes
 - (e) Told they have been hacked and they have access to their images, personal information and contacts
 - (f) Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or learner

4. CHILDREN WHO ARE ABSENT FROM EDUCATION

- 4.1 A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

- 4.2 There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:
- (a) Are at risk of harm or neglect
 - (b) Are at risk of forced marriage or FGM
 - (c) Come from Gypsy, Roma, or Traveller families
 - (d) Come from the families of service personnel
 - (e) Go missing or run away from home or care
 - (f) Are supervised by the youth justice system
 - (g) Cease to attend a college
 - (h) Come from new migrant families
- 4.3 We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the college without a new college being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.
- 4.4 Colleagues will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.
- 4.5 If an colleague suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

5. CHILD CRIMINAL EXPLOITATION

- 5.1 Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
- 5.2 The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.
- 5.3 The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines),

forced to shoplift or pickpocket, or to threaten other young people.

5.4 Indicators of CCE can include a child:

- (a) Appearing with unexplained gifts or new possessions
- (b) Associating with other young people involved in exploitation
- (c) Suffering from changes in emotional wellbeing
- (d) Misusing drugs and alcohol
- (e) Going missing for periods of time or regularly coming home late
- (f) Regularly missing college or education
- (g) Not taking part in education

5.5 If a colleague suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

6. CHILD SEXUAL EXPLOITATION

6.1 Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

6.2 The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

6.3 The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

6.4 CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

6.5 In addition to the CCE indicators above, indicators of CSE can include a child:

- (a) Having an older boyfriend or girlfriend
- (b) Suffering from sexually transmitted infections or becoming pregnant

6.6 If a colleague suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

7. CHILD-ON-CHILD ABUSE

- 7.1 Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of college. It can also take place both face-to-face and online, and can occur simultaneously between the 2.
- 7.2 Our college has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.
- 7.3 Child-on-child abuse is most likely to include, but may not be limited to:
- (a) Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
 - (b) Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
 - (c) Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
 - (d) Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
 - (e) Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
 - (f) Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - (g) Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - (h) Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - (i) Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- 7.4 Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.
- 7.5 If colleagues have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our college's approach to this type of abuse.
- 7.6 When considering instances of harmful sexual behaviour between children, we will consider their

ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

8. DOMESTIC ABUSE

- 8.1 Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- 8.2 Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.
- 8.3 Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.
- 8.4 Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.
- 8.5 Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.
- 8.6 If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in college (usually the designated safeguarding lead) before the child or children arrive at college the following day.
- 8.7 The DSL will provide support according to the child's needs and update records about their circumstances.

9. HOMELESSNESS

- 9.1 Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
- 9.2 The DSL deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).
- 9.3 Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.

10. HONOUR-BASED ABUSE

- 10.1 So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.
- 10.2 Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.
- 10.3 All forms of HBA are abuse and will be handled and escalated as such. All colleagues will be alert to the possibility of a child being at risk of HBA or already having suffered it. If colleagues have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

11. FEMALE GENITAL MUTILATION

- 11.1 The DSL will make sure that colleagues have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.
- 11.2 Section 11.6 and 11.7 of this policy sets out the procedures to be followed if an colleague discovers that an act of FGM appears to have been carried out or suspects that a learner is at risk of FGM.
- 11.3 Indicators that FGM has already occurred include:
 - (a) A learner confiding in a professional that FGM has taken place
 - (b) A mother/family member disclosing that FGM has been carried out
 - (c) A family/learner already being known to social services in relation to other safeguarding issues
 - (d) A girl:
 - i. Having difficulty walking, sitting or standing, or looking uncomfortable
 - ii. Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - iii. Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - iv. Having frequent urinary, menstrual or stomach problems
 - v. Avoiding physical exercise or missing PE
 - vi. Being repeatedly absent from college, or absent for a prolonged period
 - vii. Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - viii. Being reluctant to undergo any medical examinations
 - ix. Asking for help, but not being explicit about the problem
 - x. Talking about pain or discomfort between her legs
- 11.4 Potential signs that a learner may be at risk of FGM include:
 - (a) The girl's family having a history of practising FGM (this is the biggest risk factor to consider)

- (b) FGM being known to be practised in the girl's community or country of origin
- (c) A parent or family member expressing concern that FGM may be carried out
- (d) A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- (e) A girl:
 - i. Having a mother, older sibling or cousin who has undergone FGM
 - ii. Having limited level of integration within UK society
 - iii. Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - iv. Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
 - v. Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - vi. Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - vii. Being unexpectedly absent from college
 - viii. Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

11.5 The above indicators and risk factors are not intended to be exhaustive.

12. FORCED MARRIAGE

- 12.1 Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.
- 12.2 It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.
- 12.3 Colleagues will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.
- 12.4 If an colleague suspects that a learner is being forced into marriage, they will speak to the learner about their concerns in a secure and private place. They will then report this to the DSL.
- 12.5 The DSL will:
 - (a) Speak to the learner about the concerns in a secure and private place
 - (b) Activate the local safeguarding procedures and refer the case to the local authority's

designated officer

- (c) Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmf@fco.gov.uk
- (d) Refer the learner to an education welfare officer, pastoral tutor, learning mentor, or college counsellor, as appropriate

13. PREVENTING RADICALISATION

- 13.1 **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- 13.2 **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
 - (a) Negate or destroy the fundamental rights and freedoms of others; or
 - (b) Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
 - (c) Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- 13.3 **Terrorism** is an action that:
 - (a) Endangers or causes serious violence to a person/people;
 - (b) Causes serious damage to property; or
 - (c) Seriously interferes or disrupts an electronic system
- 13.4 The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- 13.5 Colleges have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that colleagues have access to appropriate training to equip them to identify children at risk.
- 13.6 We will assess the risk of children in our college from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.
- 13.7 We will ensure that suitable internet filtering is in place, and equip our learners to stay safe online at college and at home.
- 13.8 There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.
- 13.9 Colleagues will be alert to changes in learners' behaviour.
- 13.10 The government website Educate Against Hate and charity NSPCC say that signs that a learner is being radicalised can include:
 - (a) Refusal to engage with, or becoming abusive to, peers who are different from themselves

- (b) Becoming susceptible to conspiracy theories and feelings of persecution
 - (c) Changes in friendship groups and appearance
 - (d) Rejecting activities they used to enjoy
 - (e) Converting to a new religion
 - (f) Isolating themselves from family and friends
 - (g) Talking as if from a scripted speech
 - (h) An unwillingness or inability to discuss their views
 - (i) A sudden disrespectful attitude towards others
 - (j) Increased levels of anger
 - (k) Increased secretiveness, especially around internet use
 - (l) Expressions of sympathy for extremist ideologies and groups, or justification of their actions
 - (m) Accessing extremist material online, including on Facebook or Twitter
 - (n) Possessing extremist literature
 - (o) Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations
- 13.11 Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – colleagues should have confidence in their instincts and seek advice if something feels wrong.
- 13.12 If colleagues are concerned about a learner, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.
- 13.13 Colleagues should **always** take action if they are worried.
- 13.14 Further information on the college's measures to prevent radicalisation are set out in other college policies and procedures, including:
- (a) **Curriculum Policy** – which outlines how we promote learners' spiritual, moral, social and cultural (SMSC) development, British values, and critical thinking
 - (b) **PSHE and RSE Policy** – where we teach learners how to recognise manipulation, develop resilience, and understand respectful relationships and diverse beliefs
 - (c) **Behaviour Policy** – which sets out expectations for respectful conduct and the procedures for addressing discriminatory, extremist or prejudiced behaviour
 - (d) **Online Safety and Acceptable Use Policy** – which explains how we educate learners about safe internet use, how we monitor online activity, and the actions we take to address online radicalisation risks
 - (e) **Colleagues Code of Conduct** – which reinforces the professional duty to report concerns about learners at risk of radicalisation and outlines appropriate colleagues behaviour

- (f) **Visiting Speakers Policy** – which details how we vet external visitors and prevent the delivery of extremist views to learners
- (g) **Prevent Risk Assessment and Action Plan** – which outlines the college's local risk context, the strategies in place to mitigate that risk, and training requirements for colleagues
 - These policies work together to ensure a whole-college approach to preventing radicalisation and supporting learners to stay safe, both online and in the wider community.

14. SEXUAL VIOLENCE AND HARASSMENT BETWEEN CHILDREN

14.1 Sexual violence and sexual harassment can occur:

- (a) Between two children of any age and sex
- (b) Through a group of children sexually assaulting or sexually harassing a single child or group of children
- (c) Online and face to face (both physically and verbally)

14.2 Sexual violence and sexual harassment exist on a continuum and may overlap.

14.3 Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same college.

14.4 If a victim reports an incident, it is essential that colleagues make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

14.5 When supporting victims, colleagues will:

- (a) Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- (b) Regularly review decisions and actions, and update policies with lessons learnt
- (c) Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- (d) Consider if there are wider cultural issues within the college that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra colleagues training could minimise the risk of it happening again
- (e) Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

14.6 Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

14.7 Colleagues should be aware of the importance of:

- (a) Challenging inappropriate behaviours
- (b) Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- (c) Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

14.8 If colleagues have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our college's approach to this type of abuse.

15. SERIOUS VIOLENCE

15.1 Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- (a) Increased absence from college
- (b) Change in friendships or relationships with older individuals or groups
- (c) Significant decline in performance
- (d) Signs of self-harm or a significant change in wellbeing
- (e) Signs of assault or unexplained injuries
- (f) Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

15.2 Risk factors which increase the likelihood of involvement in serious violence include:

- (a) Being male
- (b) Having been frequently absent or permanently excluded from college
- (c) Having experienced child maltreatment
- (d) Having been involved in offending, such as theft or robbery

15.3 Colleagues will be aware of these indicators and risk factors. If an colleague has a concern about a learner being involved in, or at risk of, serious violence, they will report this to the DSL.

16. CHECKING THE IDENTITY AND SUITABILITY OF VISITORS

16.1 All visitors will be required to verify their identity to the satisfaction of colleagues and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

16.2 If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

16.3 Visitors are expected to sign the visitors' book and wear a visitor's badge.

16.4 Visitors to the college who are visiting for a professional purpose, such as educational

psychologists and college improvement officers, will be asked to show photo ID and:

- (a) Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- (b) The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

16.5 All other visitors, including visiting speakers, will be accompanied by an colleague at all times. We will not invite into the college any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using college facilities is not seeking to disseminate extremist views or radicalise learners or colleagues.

17. NON-COLLECTION OF CHILDREN

17.1 At Indie Education, the safety and welfare of all learners remains our responsibility until they have been safely collected at the end of the college day or session. We follow the procedures below in the event that a child is not collected on time:

17.2 INITIAL CHECKS

- 17.2.1 The colleague responsible will check for any messages from parents/carers (e.g. via phone, email or the college office) explaining the delay.
- 17.2.2 Attempts will be made to contact the parent/carer using all available contact details, including emergency contacts if necessary.

17.3 SUPERVISION

- 17.3.1 The child will be supervised by a designated colleague in a safe, appropriate space, such as the college office or a designated waiting area.
- 17.3.2 The child will be reassured and kept calm. Colleagues will not discuss the situation with the child beyond providing comfort and assurance.

17.4 ESCALATION

- 17.4.1 If the parent/carer or emergency contact cannot be reached within 30–45 minutes, the CEO or DSL will be informed.
- 17.4.2 If, after one hour, the child remains uncollected and no contact can be made with a responsible adult, the DSL may contact **Children's Social Care** for advice or support in line with local safeguarding procedures.

17.5 RECORDING

- 17.5.1 A record of the incident will be made, including:
 - (a) Time of expected and actual collection
 - (b) Communications with parents/carers and emergency contacts
 - (c) Actions taken by colleagues and any decisions made

- 17.5.2 Repeated incidents of late collection will be monitored and may result in a formal conversation with the family and/or a referral to Early Help or Children's Services if appropriate.

17.6 **LATE COLLECTION CHARGES (IF APPLICABLE)**

- 17.6.1 Where applicable (e.g. for wraparound care or clubs), late collection charges may be issued in line with the college's wraparound care terms and conditions.
- 17.6.2 This procedure ensures that all children are kept safe and appropriately cared for in the event of late collection. If you would like more detail, please refer to our **Late or Non-Collection of Children Procedure**, available on request.

18. **MISSING LEARNERS**

- 18.1 Our procedures are designed to ensure that if a learner goes missing during the college day or during an off-site activity, they are located quickly and returned to safe and effective supervision as soon as possible.

- 18.2 If a child is found to be missing, we will take the following actions:

18.3 **IMMEDIATE SEARCH AND ALERT**

- 18.3.1 The colleague who notices a learner is missing will **immediately inform the DSL or a senior colleague**.
- 18.3.2 A **register or headcount** will be taken to confirm who is missing.
- 18.3.3 Colleagues will carry out a **systematic search of the college site**, including toilets, classrooms, playgrounds, entrances, exits, and any known "hiding spots".
- 18.3.4 Off-site locations (e.g. trips or visits) will follow the **risk assessment and emergency plan** agreed in advance of the visit.

18.4 **ESCALATION IF THE LEARNER IS NOT FOUND**

- 18.4.1 If the learner is not found within 10–15 minutes, the CEO (or DSL) will:
- (a) Contact the learner's **parent/carer** to inform them and check if the learner has made contact with home
 - (b) **Inform the police** if there is reason to believe the child has left the premises or may be at risk of harm
 - (c) Notify **children's social care** if the child is subject to a child protection plan, looked after, or known to be vulnerable

18.5 **SUPERVISION AND SUPPORT**

- (a) While the search and communication efforts are underway, senior colleagues will ensure that:
- i. Remaining learners are safely supervised and reassured
 - ii. Any siblings or close friends of the missing child are supported appropriately

18.6 ONCE THE LEARNER IS FOUND

- 18.6.1 The child will be returned to supervision and their welfare will be assessed
- 18.6.2 A senior colleague will speak with the learner to establish why they went missing and if they are at risk of harm
- 18.6.3 Parents/carers will be informed of the outcome and any support put in place
 - (a) If appropriate, a referral will be made to the DSL for further safeguarding follow-up

18.7 RECORDING THE INCIDENT

- 18.7.1 A full written record of the incident will be completed, including:
 - (a) The time the learner was found to be missing
 - (b) Actions taken by colleagues
 - (c) Communications with parents, police or other agencies
 - (d) Outcomes and any lessons learned
- 18.7.2 The record will be stored securely on our monitoring system and reviewed by the DSL and/or CEO to inform future risk assessments or college procedures
- 18.7.3 Repeated or serious incidents of learners going missing will result in a review of the child's needs and a risk assessment being put in place. If the incident occurs off-site (e.g. on a trip or visit), the group leader must follow the same principles while working in line with the visit's risk management plan and immediately inform the CEO or DSL.